

# Interim Finding Report for Reasonable Assurance

On the adequacy of the offsite  
Radiological Emergency Response Planning  
Victoria County Station (VCS) Nuclear Power Plant  
Victoria, Texas

2010-01-26



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

## TABLE OF CONTENTS

<b><i>Executive Summary</i></b>	<b>2</b>
<b>I. INTRODUCTION</b>	<b>3</b>
A. General Characteristics of the Victoria County Station	3
B. Emergency Response Organizations	4
C. Plans	5
D. Basis for Findings	6
E. Evaluation Format	6
<b>II. REVIEW AND EVALUATION OF OFFSITE EMERGENCY PREPAREDNESS PLANS AND PROCEDURES FOR THE VICTORIA COUNTY STATION AGAINST THE PLANNING STANDARDS OF NUREG-0654/FEMA REP-1, REV.1</b>	<b>7</b>
A. Assignment of Responsibility (Organizational Control):	7
B. Onsite Emergency Organization	20
C. Emergency Response Support and Resources	20
D. Emergency Classification System	27
E. Notification Methods and Procedures	30
F. Emergency Communications	39
G. Public Education and Information	48
H. Emergency Facilities and Equipment	58
I. Accident Assessment	69
J. Protective Response	74
K. Radiological Exposure Control	99
L. Medical and Public Health Support	108
M. Recovery and Reentry Planning and Post-Accident Operations	112
N. Exercises and Drills	115
O. Radiological Emergency Response Training	132
P. Responsibility for the Planning Effort	144
<b>III. Post COL Reasonable Assurance Tracking</b>	<b>156</b>
<b>IV. Criterion Rating Summary</b>	<b>159</b>
A. Rating Summary for the State of Texas Emergency Management Plan, Annex D, Radiological Emergency Management Plan, Rev 06/05, August 18, 2005	159
B. Emergency Management Plan for Victoria County, Version 2, May 2009	160
C. Emergency Management Plan for Goliad County, Version 2, May 2009	161
D. Emergency Management Plan for Refugio County, Version 2, September 2009	162
<b>V. ACRONYMS KEY AND ABBREVIATIONS</b>	<b>163</b>

## ***Executive Summary***

On September 3, 2008 Exelon Nuclear Texas Holdings, LLC submitted a Combined License (COL) Application to the U.S. Nuclear Regulatory Commission to construct and operate Victoria County Station Nuclear Power Plant facility Units 1 and 2 located in Victoria County, Texas. The review of the materials provided with the COL Application resulted in the findings for the sixteen Planning Standards one was found to be not applicable and fifteen were found to be adequate. Nine of those fifteen adequate Planning Standards have items being tracked on the Post COL Reasonable Assurance Tracking.

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 Goliad, Refugio, and Victoria Counties (May 2009)

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.

Select criteria are not able to be evaluated in the planning phase. They are placed on the Post COL Reasonable assurance Tracking Section of the report to be reviewed and evaluated prior to the interim finding Report for Reasonable Assurance on the Adequacy of Offsite Radiological Emergency Response Preparedness.

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 – See Post COL Reasonable Assurance Tracking Form
- Planning Standard B: N/A
- Planning Standard C: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard D: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard E: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard F: Adequate
- Planning Standard G: Adequate
- Planning Standard H: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard I: Adequate
- Planning Standard J: Adequate - See Post COL Reasonable Assurance Tracking Form
- Planning Standard K: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard L: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard M: Adequate
- Planning Standard N: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard O: Adequate – See Post COL Reasonable Assurance Tracking Form
- Planning Standard P: Adequate – See Post COL Reasonable Assurance Tracking Form

Adequacy of the VCS COL Application Emergency Plan review for OROs is also dependent on:

- Satisfactory resolution of all Post COL Reasonable Assurance Tracking Form items in Section III of this report.
- Satisfactory demonstration of plan implementation during a joint exercise with the licensee and state and local governments and utilizing VCS Unit 1 and 2 facilities.

## **I. INTRODUCTION**

### **A. General Characteristics of the Victoria County Station**

The VCS site is approximately 13.3 miles south of the city of Victoria and located in the southern part of Victoria County, Texas. The city of Victoria is the county seat and is also the nearest population center with a population of 60,603 based on the 2000 census. There are three counties that are part of

the 10-mile EPZ for the VCS site which include Victoria County, Refugio County, and Goliad County.

The proposed VCS site is comprised of approximately 11,500 acres of land. The site boundary is the same as the property boundary. The northwest corner of the site boundary lies closely adjacent to U.S. Highway 77. The southeast site boundary runs parallel to the Union Pacific railway. The northeast site boundary winds through Linn Lake and along a portion of the lower Guadalupe River to the southeast corner of the VCS site. Situated to the east is the unincorporated town of Bloomington with a population of 2562. Bloomington is the largest community within 10 miles of the proposed VCS site. Other communities within 10 miles are Dernal, Inari, and McFaddin. Among them, McFaddin is the nearest town and is approximately 4.3 miles southeast of the VCS power block area. Population estimates for the proposed 10-mile Emergency Planning Zone (EPZ) are 6428 and are projected to increase to near 7000 by 2010.

There are 10 active and two abandoned natural gas transmission pipelines, one gasoline pipeline, three active and one abandoned natural gas gathering pipelines, and six major natural gas and oil fields with active extraction wells. In addition, there are six industrial facilities in the 10-mile EPZ which include Air Liquide America Corporation, INVISTA-DuPont, Equistar Chemicals, ConAgra International Fertilizer, Inergy Propane, LLC, and Tennessee Gas Pipeline Station 9.

Major transportation routes in the EPZ include the Victoria Barge Canal (5.05 miles to nearest point of approach), U.S. Highway 77, and the Union Pacific Railway.

The EPZ is divided into 13 planning zones 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 off-site 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 Victoria County Station (VCS).

The Department of State Health Services (DSHS) directs the technical response to an accident at VCS, fulfilling technical functions such as accident assessment, radiological monitoring, and development of off-site 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's five tabs address the types of radiological emergencies; they 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. Specific instructions required for implementing given procedures with respect to an individual facility or accident type 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 Victoria County, Version 2, May 2005 including annexes
- Emergency Management Plan for Goliad County, Version 2, May 2005 including annexes
- Emergency Management Plan for Refugio County, Version 2, September 2005 including annexes
- Currently developed State and County 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 353 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 VICTORIA COUNTY STATION AGAINST THE PLANNING STANDARDS OF NUREG-0654/FEMA REP-1, REV.1**

(Evaluation elements applicable only to utilities are not evaluated)

- 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. Response organizations are identified.

Victoria County: Plans are adequate. All response organizations for the county are identified.

Goliad County: Plans are adequate. All response organizations for the county are identified.

Refugio County: Plans are adequate. All response organizations for the county 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.

Victoria County:

Basic Plan Section V.F

Annex W Section III

Annex W Section V



Goliad County:  
Basic Plan Section V.F  
Annex W Section III  
Annex W Section V

Refugio County:  
Basic Plan Section V.F  
Annex W Section III  
Annex W Section V

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. The Concept of Operations for all responding entities is delineated.

Victoria County: Plans are adequate. The Concept of Operations for all responding entities is delineated.

Goliad County: Plans are adequate. The Concept of Operations for all responding entities is delineated.

Refugio 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

Victoria County:  
Basic Plan Section V  
Basic Plan Section VI  
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

Goliad County:  
Basic Plan Section V  
Basic Plan Section VI  
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 8 Section III  
Annex W Tab 9 Section IV

Refugio County:  
Basic Plan Section V  
Basic Plan Section VI  
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**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

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

### **Criterion Statement**

State of Texas: Plans are adequate. The diagram illustrates the correlation of plan elements.

Victoria County: Plans are adequate. Attachment 3 illustrates the structure of the Victoria County emergency organization with the County Judge in charge of the emergency response.

Goliad County: Plans are adequate. Attachment 3 illustrates the structure of the Goliad County emergency organization with the County Judge in charge of the emergency response.

Refugio County: Plans are adequate. Attachment 3 illustrates the structure of the Refugio County emergency organization with the County Judge in charge of the emergency response.

### **Plan Reference**

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

Victoria County:  
Basic Plan Attachment 3

Goliad County:  
Basic Plan

Refugio County:  
Basic Plan Attachment 3

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. 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.

Victoria County: Plans are adequate. The plan specifies who coordinates response activities under the authority of the County Judge/Mayor and the Emergency Management Coordinator.

Goliad County: Plans are adequate. The plan specifies who coordinates response activities under the authority of the County Judge/Mayor and the Emergency Management Coordinator.

Refugio County: Plans are adequate. The plan specifies who coordinates response activities under the authority of the County Judge/Mayor and the Emergency Management Coordinator.

### **Plan Reference**

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

Victoria County:  
Basic Plan Section VI.A and B  
Annex W Section V  
Basic Plan, Section VII.C  
Goliad County:  
Basic Plan Section VI.A and B  
Annex W Section V  
Basic Plan, Section VII.C

Refugio County:  
Basic Plan Section VI.A and B  
Annex W Section V  
Basic Plan, Section VII.C

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. 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.

Victoria County: Plans are adequate. The responsibility for Coordination of the emergency communications and emergency communication facilities rests with the Victoria County 911 Center. The Judge/Mayor is the overall authority for the EOC and its emergency communication center. The Sheriff is responsible for maintaining a 24-hour communication capability and ensuring interoperability. The location of the 24-hour communication center is identified.

Goliad County: Plans are adequate. The responsibility for Coordination of the emergency communications and emergency communication facilities rests with the Victoria County 911 Center. The Judge/Mayor is the overall authority for the EOC and its emergency communication center. The Sheriff is responsible for maintaining a 24-hour communication capability and ensuring interoperability. The location of the 24-hour communication center is identified.

Refugio County: Plans are adequate. The responsibility for Coordination of the emergency communications and emergency communication facilities rests with the Victoria County 911 Center. The Judge/Mayor is the overall authority for the EOC and its emergency communication

center. The Sheriff is responsible for maintaining a 24-hour communication capability and ensuring interoperability. The location of the 24-hour communication center is identified.

### **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 VII

Victoria County:

Annex W Section IV

Annex W Section V.B

Annex W Appendix 2 Section I.A

Annex W, Tab 1, Section VI.B

Goliad County:

Annex W Section IV

Annex W Section V.B

Annex W Tab 2 Section I.A

Annex W, Tab 1, Section VI.B

Refugio County:

Annex W Section IV

Annex W Section V.B

Annex W Tab 2 Section I.A

Annex W, Tab 1, Section VI.B

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. Annex D, Tab 1, Chapter 2, Section VII. C. cites specific VCS 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.

Victoria County: Plans are adequate. All functions are specified and key individuals identified by title. A matrix of the responsibilities by functional area that identifies organizations responsible for primary and support roles is present in the plan.

Goliad County: Plans are adequate. All functions are specified and key individuals identified by title. A matrix of the responsibilities by functional area that identifies organizations responsible for primary and support roles is present in the plan.

Refugio County: Plans are adequate. All functions are specified and key individuals identified by title. A matrix of the responsibilities by functional area that identifies organizations responsible for primary and support roles is present in the plan.

### **Plan Reference**

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

Victoria County:  
Basic Plan Section V  
Annex W Section V

Goliad County:  
Basic Plan Section V  
Annex W Section V

Refugio County:  
Basic Plan Section V  
Annex W Section V

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. 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.

Victoria County: Plans are adequate. The Basic Plan, Section I cites the Federal, State, and local Acts, Executive Order, Codes, Presidential Directives, Plans, Court Orders, City Ordinances, Resolutions and Letters of Agreement that govern the organization and operational concepts of the Victoria County emergency plan. The plan identifies the individual with the authority to declare an emergency and make disaster declarations.

Goliad County: Plans are adequate. The Basic Plan, Section I cites the Federal, State, and local Acts, Executive Order, Codes, Presidential Directives, Plans, Court Orders, City Ordinances, Resolutions and Letters of Agreement that govern the organization and operational concepts of the Goliad County emergency plan. The plan identifies the individual with the authority to declare an emergency and make disaster declarations.

Refugio County: Plans are adequate. The Basic Plan, Section I cites the Federal, State, and local Acts, Executive Order, Codes, Presidential Directives, Plans, Court Orders, City Ordinances, Resolutions and Letters of Agreement that govern the organization and operational concepts of the Refugio County emergency plan. The plan identifies the individual with the authority to declare an emergency and make disaster declarations.



### **Plan Reference**

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

Victoria County:  
Basic Plan Section I  
Annex W Section I  
Basic Plan, Section V.G

Goliad County:  
Basic Plan Section I  
Annex W Section I  
Basic Plan, Section V.G

Refugio County:  
Basic Plan Section I  
Annex W Section I  
Basic Plan, Section V.G

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. 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.

Victoria County: Plans are adequate. A description of the current letters of agreement with each of the participating organizations is present in the Basic Plan Attachment 6.

Goliad County: *The plan only provides a list of verbal agreements. In order to meet the standards of NUREG 0654, written agreements must be described in the plans.*

Refugio County: Plans are adequate. A description of the current letters of agreement with each of the participating organizations is present in the Basic Plan Attachment 6.

## **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)

Victoria County:

Basic Plan Attachment 6

Goliad County:

Tab 1 Annex D Texas Emergency Management Plan

Basic Plan, Attachment 6

Refugio County:

Basic Plan Attachment 6

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio 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. 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.

Victoria County: Plans are adequate. In Annex W, Section IV, A., each emergency organization assigned with emergency response duties is responsible for providing extended 24-hour operations. The County Judge is responsible for directing the emergency operation. Each department, agency or group is responsible for providing essential emergency service throughout a protracted 24-hour operation. The City of Victoria Sheriff's Office Dispatch is specifically tasked with staffing for 24-hour communications capability in Annex W, Attachment 2, Section I. Annex W Section IV designates that each department, agency or group shall provide essential emergency service throughout a protracted 24-hour operation.

Goliad County: Plans are adequate. In Annex W, Section IV, A., each emergency organization assigned with emergency response duties is responsible for providing extended 24-hour operations. The County Judge is responsible for directing the emergency operation. Each department, agency or group is responsible for providing essential emergency service throughout a protracted 24-hour operation. The City of Victoria Sheriff's Office Dispatch is specifically tasked with staffing for 24-hour communications capability in Annex W, Attachment 2, Section I. Annex W Section IV designates that each department, agency or group shall provide essential emergency service throughout a protracted 24-hour operation.

Refugio County: Plans are adequate. In Annex W, Section IV, A., each emergency organization assigned with emergency response duties is responsible for providing extended 24-hour operations. The County Judge is responsible for directing the emergency operation. Each department, agency or group is responsible for providing essential emergency service throughout a protracted 24-hour operation. The City of Victoria Sheriff's Office Dispatch is specifically tasked with staffing for 24-hour communications capability in Annex W, Attachment 2, Section I. Annex W Section IV designates that each department, agency or group shall provide essential emergency service throughout a protracted 24-hour operation.

### **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

Victoria County:

Annex W Section IV A.

Annex W Appendix 2 Section I

Goliad County:

Annex W Section IV.A

Annex W Tab 2 Section I

Refugio County:

Annex W Section IV.A

Annex W Tab 2 Section I

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Plan Reference**

State of Texas:

Texas Emergency Management Plan, 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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Plan Reference**

State of Texas:

Annex D, Section IV. B.2  
Annex D, Section IV. B.6  
Annex D, Tab 1, Section VI.B.6  
Annex D, Tab 1, Chapter 2, Section III.D.1

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: Plans are adequate. Annex W identifies telephone, radio, EAS and volunteer (Amateur Radio Club) capabilities. Annex W, Section VIII., Subsection G.6, and Section IX., Subsection G.2.d provide a reference to existing Annex M for guidance and procedures for obtaining resources during emergency situations.

Goliad County: Plans are adequate. Annex W identifies telephone, radio, EAS and volunteer (Amateur Radio Club) capabilities. Annex W, Section VIII., Subsection G.6, and Section IX., Subsection G.2.d provide a reference to existing Annex M for guidance and procedures for obtaining resources during emergency situations. The Goliad County Plan, Annex W revisions also include reference to the Texas Regional Response Network (TRRN) system statewide database described in the Goliad County Plan, Annex M, Appendix 3.

Refugio County: Plans are adequate. Annex W identifies telephone, radio, EAS and volunteer (Amateur Radio Club) capabilities. Annex W, Section VIII., Subsection G.6, and Section IX., Subsection G.2.d provide a reference to existing Annex M for guidance and procedures for obtaining resources during emergency situations.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Section VI.B.6 (last sentence)  
Annex D, Tab 1, Chapter 2, Section III (III.C.1. for Federal Liaison support)

Victoria County:  
Annex W, Appendix 2, Section III

Goliad County:  
Annex W, Tab 2, Section III

Refugio County:  
Annex W, Tab 2 Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 VCS activities, relaying information to other RCP response teams and keeping VCS informed of RCP activities.



Victoria County: Plans are adequate. The County Judge/City Mayor may dispatch a county representative to the EOF to coordinate activities with Federal and utility response personnel.

Goliad County: Plans are adequate. The County Judge may dispatch a county representative to the EOF to coordinate activities with Federal and utility response personnel.

Refugio County: Plans are adequate. The County Judge 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

Victoria County:

Annex W, Appendix 9, Section IV.C.7

Goliad County:

Annex W, Tab 9, Section IV.C.7

Refugio County:

Annex W, Tab 9, Section IV.C.7

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. General capabilities and availability of primary and backup laboratories are described in state plans.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Plan Reference**

State of Texas:

Annex D, Section IV.G.1

Annex D, Tab 1, Section VII.G

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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: The plan outlines the primary responsibilities of the local governments, State, DSHS, GDEM, law enforcement and volunteer groups to assist the county in matters relating to VCS incidents. The VCS letters of agreement (LOAs) are contained in the VCS NRC COL Application (the county and state certification letters are a self standing file in Part 5 of the application; and the VCS LOAs with Victoria County are contained in Appendix 2 to the Radiological Emergency Plan Annex for VCS. The county LOAs (i.e., mutual aid agreements) are listed in Attachment 6 of each county's Basic Plan. The location of a copy of each LOA is listed on Attachment 6 (with the exception of Goliad County as the mutual aid agreements are verbal).

Goliad County: The plan outlines the primary responsibilities of the local governments, State, DSHS, GDEM, law enforcement and volunteer groups to assist the county in matters relating to VCS incidents. The VCS letters of agreement (LOAs) are contained in the VCS NRC COL Application (the county and state certification letters are a self standing file in Part 5 of the application; and the VCS LOAs with Victoria County are contained in Appendix 2 to the Radiological Emergency Plan Annex for VCS. The county LOAs (i.e., mutual aid agreements) are listed in Attachment 6 of each county's Basic Plan. The location of a copy of each LOA is listed on Attachment 6 (with the exception of Goliad County as the mutual aid agreements are verbal). *Written letters of agreement are required to meet the intent of this criterion, but are not available.*

Refugio County: Plans are adequate. The plan outlines the primary responsibilities of the local governments, State, DSHS, GDEM, law enforcement and volunteer groups to assist the county in matters relating to VCS incidents. The VCS letters of agreement (LOAs) are contained in the VCS NRC COL Application (the county and state certification letters are a self standing file in Part 5 of the application; and the VCS LOAs with Victoria County are contained in Appendix 2 to the Radiological Emergency Plan Annex for VCS. The county LOAs (i.e., mutual aid agreements) are listed in Attachment 6 of each county's Basic Plan. The location of a copy of each LOA is listed on Attachment 6 (with the exception of Goliad County as the mutual aid agreements are verbal).

### **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

Victoria County:  
Annex W, Section III  
Annex W Section III.A.17

Goliad County:  
Annex W, Section III  
Annex W Section III.A.17

Refugio County:  
Annex W, Section III  
Annex W Section III.A.17

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio 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.

Victoria 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 Emergency Classification Level (ECL).

Goliad County: Plans are adequate. The county plan utilizes the classification system that is consistent with both the applicant and the State. The plan includes general actions to be taken at the county for each Emergency Classification Level (ECL).

Refugio County: Plans are adequate. The county plan utilizes the classification system that is consistent with both the applicant and the State. The plan includes general actions to be taken at the county for each Emergency Classification Level (ECL).

### **Plan Reference**

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

Victoria County: Annex W, Section VI

Goliad County: Annex W, Section VI

Refugio County: Annex W, Section VI

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

- D.4. 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.

Victoria County: Plans are adequate. The Basic Plan states that all departments and agencies tasked in the plan are expected to develop and maintain standard operating procedures. Annex W includes specific reference to individual procedures to be implemented, as appropriate, in the event of an emergency. Annex W, Section IX., Subsection I includes the requirement for applicable emergency action procedures, and Attachment 3 specifies the emergency actions to be taken at each ECL.

Goliad County: Plans are adequate. The Basic Plan states that all departments and agencies tasked in the plan are expected to develop and maintain standard operating procedures. Annex W includes specific reference to individual procedures to be implemented, as appropriate, in the event of an emergency. Annex W, Section IX., Subsection I includes the requirement for applicable emergency action procedures, and Attachment 3 specifies the emergency actions to be taken at each ECL.

Refugio County: Plans are adequate. The Basic Plan states that all departments and agencies tasked in the plan are expected to develop and maintain standard operating procedures. Annex W includes specific reference to individual procedures to be implemented, as appropriate, in the event of an emergency. Annex W, Section IX., Subsection I includes the requirement for applicable emergency action procedures, and Attachment 3 specifies the emergency actions to be taken at each ECL.

### **Plan Reference**

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

Victoria County:  
Basic Plan Section V.B.6; Annex W Section IX.I

Goliad County:  
Basic Plan Section V.B.6; Annex W Section IX.I

Refugio County:  
Basic Plan Section V.B.6; Annex W Section IX.I

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 Texas Department of State Health Services (DSHS) Radiation Control Program (RCP) at the State level and the local jurisdiction would be receiving the follow-up notifications from the licensee.

Victoria County: Plans are adequate. The Basic Plan states that the responsibility for receipt of notification messages, alerting and disseminating warning information from VCS is assigned to the County Sheriff or City of Victoria Police Chief. Annex W, Appendix 1, Section IV is consistent with the NUREG-0654 recommended responses for each ECL. Annex W, Section V.B states that the Victoria County Sheriff and City of Victoria 911 Center maintain 24-hour communications capability; receives and authenticates notification messages from VCS, and develops primary and alternate communications systems to interlink with VCS, State, local and other emergency response organizations.

Goliad County: Plans are adequate. The Basic Plan the primary responsibility receipt, alerting and disseminating warning information from VCS is assigned to the County Sheriff. Annex W, Tab 1, Section IV is consistent with the NUREG-0654 recommended responses for each ECL. Annex W, Section V.B states that the Goliad County Sheriff's office maintains 24-hour communications capability; receives and authenticates notification messages from VCS, and develops primary and alternate communications systems to interlink with VCS, State, local and other emergency response organizations.

Refugio County: Plans are adequate. The Basic Plan the primary responsibility receipt, alerting and disseminating warning information from VCS is assigned to the County Sheriff. Annex W, Tab 1, Section IV is consistent with the NUREG-0654 recommended responses for each ECL. Annex W, Section V.B states that the Refugio County Sheriff's office maintains 24-hour communications capability; receives and authenticates notification messages from VCS, and develops primary and alternate communications systems to interlink with VCS, State, local and other emergency response organizations.

### **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

Victoria County: Basic Plan Section VI.B.5.b; Annex W Section V.B;  
Annex W Appendix 1 Section IV



Goliad County: Basic Plan Section VI.B.5.b; Annex W Section V.B;  
Annex W Tab 1 Section IV

Refugio County: Basic Plan Section VI.B.5.b; Annex W Section V.B;  
Annex W Tab 1 Section IV

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 VCS (VCS). 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.

Victoria County: Plans are adequate. The Concept of Operations section describes the method by which the county will initiate their notification process by each ECL. The notification sources lists the means by which the notification will be accomplished (TLETS, landline and ringdown telephones, radios or telecopier). The senior elected officials of the county are responsible for initiating the notification to the public and first responders.

Goliad County: Plans are adequate. The Concept of Operations section describes the method by which the county will initiate their notification process by each ECL. The notification sources lists the means by which the notification will be accomplished (TLETS, landline and ringdown telephones, radios or telecopier). The senior elected officials of the county are responsible for initiating the notification to the public and first responders.

Refugio County: Plans are adequate. The Concept of Operations section describes the method by which the county will initiate their notification process by each ECL. The notification sources lists the means by which the notification will be accomplished (TLETS, landline and ringdown telephones, radios or telecopier). The senior elected officials of the county are 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

Victoria County: Annex W Appendix 1 Section IV

Goliad County: Annex W Tab 1 Section IV

Refugio County: Annex W Tab 1 Section IV

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 VCS, State, county, and Federal public information representatives.

These representatives coordinate information, issue news bulletins, and participate jointly in news briefings.

Victoria County: Plans are adequate. The Victoria County Sheriff's Office/City of Victoria 911 Center 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 (siren activation, alert radio activation, FIRST CALL Interactive Network, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over the local EAS radio stations, KXIX-FM (primary), KVIC-FM, KLUB-FM and KVNN-AM.

Goliad County: Plans are adequate. The Goliad 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 (siren activation, alert radio activation, Connect-CITY, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over the local EAS radio stations, KXIX-FM (primary), KVIC-FM, KLUB-FM and KVNN-AM.

Refugio County: Plans are adequate. The Refugio 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 (siren activation, alert radio activation, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over the local EAS radio stations, KZFM-FM (primary) and KNCN-FM.

### **Plan Reference**

State of Texas:

Annex D, Tab 1, section VII.B.4

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

Victoria County: Annex W Section V.C, Appendix 1 Section IV.E.3, and Appendix 5 All

Goliad County: Annex W Section V.C, Tab 1 Section IV.E.3, and Tab 5 All

Refugio County: Annex W Section V.C, Tab 1 Section IV.E.3, and Tab 5  
All

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan states that the Victoria County Judge or City Mayor is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens are continuously monitored by a computer and the control point is at the Victoria County Sheriff's Office or city of Victoria 911 Center. The EAS is broadcast over four local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

Goliad County: Plans are adequate. The plan states that the Goliad County Judge is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens

are continuously monitored by a computer and the control point is at the Goliad County Sheriff's Department. The EAS is broadcast over four local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

Refugio County: Plans are adequate. The plan states that the Refugio County Judge is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens are continuously monitored by a computer and the control point is at the Refugio County Sheriff's Department. The EAS is broadcast over local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

### **Plan Reference**

State of Texas:

Texas Emergency Management Plan, 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

Victoria County:

Basic Plan Section V.B.2;

Annex W, Section V.C.7

Annex W Section V.C.2 and Appendix 1 Section III

Goliad County:

Annex W, Section V.C.7

Annex W Section V.C.2 and Tab 1 Section III

Refugio County:

Annex W, Section V.C.7

Annex W Section V.C.2 and Tab 1 Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 referenced by the plan addresses pre-scripted messages containing all required information that are consistent with the utility ECLs.

Victoria County: The county plan states that the Public Information Officer (PIO), designated by the County Judge/City Mayor shall coordinate information and media releases with the County/City and appropriate government agencies. The PIO shall obtain approval and authorization for news advisories and EAS messages containing information on recommended protective measures from the County Judge/City Mayor prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information. *The plan does not include copies of pre-drafted EAS messages intended for the public that would be modified as necessary and sent to the EAS station(s). In addition, references were made to Procedures 10, 60 and 63 which were not included in the application.*

Goliad County: The county plan states that the Public Information Officer (PIO), designated by the County Judge shall coordinate information and media releases with the County and appropriate government agencies. The PIO shall obtain approval and authorization for news advisories and EAS messages containing information on recommended protective measures from the County Judge prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information. *The plan does not include copies of pre-drafted EAS messages intended for the public that would be modified as necessary and sent to the EAS station(s). In addition, references were made to Procedures 10, 60 and 63 which were not included in the application.*

Refugio County: The county plan states that the Public Information Officer (PIO) designated by the County Judge shall coordinate information and media releases with the County and appropriate government agencies. The PIO shall obtain approval and authorization of news advisories and EAS messages with information on recommended protective measures from the County Judge prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information. *The plan does not include copies of pre-drafted EAS messages intended for the public that would be modified as necessary and sent to the EAS station(s). In addition, references were made to Procedures 10, 60 and 63 which were not included in the application.*

### **Plan Reference**

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

Victoria County:  
Basic Plan Section VI.B.5.b; Annex W Section V.D and Appendix 5 All

Goliad County:  
Basic Plan Section VI.B.5.b; Annex W Section V.D and Tab 5 All

Refugio County:  
Basic Plan Section VI.B.5.b; Annex W Section V.D and Tab 5 All

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

### **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.

Victoria County: Plans are adequate. The plan references in Annex W and the additional appendixes note that the Victoria 911 Center Dispatcher has the primary responsibility for maintaining a 24-hour per day notification and activation of emergency response personnel with DPS, Victoria as a supporting agency. These references list a very detailed alerting and notification dissemination system to the local officials, EOC staff, Emergency Management Coordinator (EMC), public health officials and American Red Cross.

Goliad County: Plans are adequate. The plan references in Annex W and the additional tabs note that the Goliad County Sheriff's Office and the Communications Officer are responsible for maintaining a 24-hour per day notification and activation of emergency response personnel. These references list a very detailed alerting and notification dissemination



system to the local officials, EOC staff, residents, transients and State officials

Refugio County: Plans are adequate. The plan references in Annex W and the additional tabs note that the Refugio County Sheriff's Office is responsible for maintaining a 24-hour per day notification and activation of emergency response personnel. These references list a very detailed alerting and notification dissemination system to the local officials, EOC staff, Emergency Management Coordinator (EMC), environmental health officials and American Red Cross.

### **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

Victoria County:

Basic Plan Section VI.B.5.c

Annex W Section V.B

Annex W Section V.C.1

Annex W Appendix 1 Sections IV.E and F

Annex W Appendix 2 Section I

Goliad County:

Basic Plan Section VI.B.5.c

Annex W Section V.B

Annex W Section V.C.1

Annex W Tab 1 Sections IV.E and F

Annex W Tab 2 Section I

Refugio County:

Basic Plan Section VI.B.5.c

Annex W Section V.B

Annex W Section V.C.1

Annex W Tab 1 Sections IV.E and F

Annex W Tab 2 Section I

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 State Operation Center (SOC) or the Disaster Districts.

Victoria County: Plans are adequate. Annex W, Appendix 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.

Goliad 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.

Refugio 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

Victoria County:  
Annex W Appendix 2 Section IV

Goliad County:  
Annex W Tab 2 Section IV

Refugio County:  
Annex W Tab 2 Section IV

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 VCS 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.

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

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

Refugio 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

Victoria County:  
Annex W, Appendix 2 Section IV

Goliad County:  
Annex W, Tab 2 Section IV

Refugio County:  
Annex W, Tab 2 Section IV

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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, but no in the applicant's response.

Victoria County: Plans are adequate. The provisions for communications between the nuclear facility and the county jurisdiction were mentioned in the portions of the plan referenced. Annex W, Section V., Subsection B.8 addresses communication systems that provide links to the EOF.

Goliad County: Plans are adequate. The provisions for communications between the nuclear facility and the county jurisdiction were mentioned in the portions of the plan referenced. Annex W, Section V., Subsection B.8 addresses communication systems that provide links to the EOF.

Refugio County: Plans are adequate. The provisions for communications between the nuclear facility and the county jurisdiction were mentioned in the portions of the plan referenced. Annex W, Section V., Subsection B.8 addresses communication systems that provide links to 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

Victoria County:

Annex W Section V.B

Annex W Appendix 2 Section IV.A

Goliad County:

Annex W Section V.B

Annex W Tab 2 Section IV.A

Refugio County:

Annex W Section V.B

Annex W Tab 2 Section IV.A

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria 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.

Goliad 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.

Refugio 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

Victoria County:  
Annex W Appendix 1 Section IV

Goliad County:  
Annex W Tab 1 Section IV

Refugio County:  
Annex W Tab 1 Section IV

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Back-up and primary communication methods are listed and adequate to cover this criterion.

Goliad County: Plans are adequate. The plans identify the primary and back-up communication methods to be used for communicating with fixed and mobile medical facilities in Goliad County.

Refugio County: Plans are adequate. Back-up and primary communication methods are listed and adequate to cover this criterion.

**Plan Reference**

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

Victoria County:  
Annex W Appendix 2 Section IV.G

Goliad County:  
Annex W Tab 2 Section IV.G

Refugio County:  
Annex W Tab 2 Section IV.G

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Monthly testing will be conducted between the county, State and the utility in accordance with the communications system testing procedure.

Goliad County: Plans are adequate. Monthly testing will be conducted between the county, State and the utility in accordance with the communications system testing procedure.

Refugio County: Plans are adequate. Monthly testing will be conducted between the county, State and the utility in accordance with the communications system testing procedure.

**Plan Reference**

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

Victoria County:  
Annex W Section V.B.4  
Annex W Appendix 2 Section IV.H



Goliad County:  
Annex W Section V.B.4  
Annex W Tab 2 Section IV.H

Refugio County:  
Annex W Section V.B.4  
Annex W Tab 2 Section IV.H

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. This issue is addressed by Procedure 14 which addresses annual distribution of public education information through informational education on radiation; emergency contacts for additional information; protective measures; and special needs.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Revision A, August 2008 is adequate. Annex W, Section V.D. addresses the annual distribution of public education information through informational education on radiation; emergency contacts for additional information; protective measures; and special needs.

Goliad County: Plans are adequate. The Goliad Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. addresses the annual distribution of public education information through informational education on radiation; emergency contacts for additional information; protective measures; and special needs.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. addresses the annual distribution of public education information through informational education on radiation; emergency contacts for additional information; protective measures; and special needs.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Section VII.F. 1, 8  
Annex D, Tab 1, Attachment 4, Section 1.B.9.

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

Goliad County:  
Annex W Section V.D.

Refugio County:  
Annex W Section V.D.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 portion of the procedure referenced to address this item contains information for transient populations including the method for distribution of this information.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. addresses the public education needs for both resident and transient populations within the EPZ. Public education materials will be audited and distributed annually.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. addresses the public education needs for both resident and transient populations within the EPZ. Public education materials will be audited and distributed annually.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Revision A, August 2008. Annex W Section V.D. addresses the public education needs for both resident and transient populations within the EPZ. Public education materials will be audited and distributed annually.

### **Plan Reference**

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

Victoria County:  
Basic Plan Section V.B.9 and Annex W Section V.D.

Goliad County:  
Annex W Section V.D.

Refugio County:  
Annex W Section V.D.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

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

Victoria County: Plans are adequate. The plan addresses the organizations capability to answer media telephone inquiries, and a phone number for such inquiries was identified in the plan.

Goliad County: Plans are adequate. The plan addresses the organizations capability to answer media telephone inquiries, and a phone number for such inquiries was identified in the plan.

Refugio County: Plans are adequate. The plan addresses the organizations capability to answer media telephone inquiries, and a phone number for such inquiries was identified in the plan.

**Plan Reference**

State of Texas:

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

Annex D, Tab 1, Chapter2, Section VII.C.8

Victoria County:

Annex A, Section VI

Annex I, Section VI,

Annex I, Appendix 3

Annex I, Appendix 4

Annex W, Section V.D

Annex W, Appendix 5, Section III.B.

Goliad County:

Annex A, Section VI

Annex I, Section VI,

Annex I, Appendix 3

Annex I, Appendix 4

Annex W, Section V.D

Annex W, Tab 5, Section III.B.

Refugio County:

Annex A, Section VI

Annex I, Section VI,

Annex I, Appendix 3

Annex I, Appendix 4

Annex W, Section V.D

Annex W, Tab 5, Section III.B.

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 that will have access to RCP personnel in the VCS EOF, the RCP staging area and the SOC in Austin via phone and fax.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. identifies the Victoria County Public Information Officer, he will coordinate information with utility, State and local jurisdictions in the JIC, and that he will not release information to the media unless authorized by the Victoria County Judge or Victoria City Mayor.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. identifies the Goliad County Public Information Officer, he will coordinate information with utility, State and local jurisdictions in the JIC, and that he will not release information to the media unless authorized by the Goliad County Judge.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Revision A, August 2008. Annex W Section V.D. identifies the Refugio County Public Information Officer, he will coordinate information with utility, State and local jurisdictions in the JIC, and that he will not release information to the media unless authorized by the Refugio County Judge.

**Plan Reference**

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

Victoria County:  
Basic Plan Section V.B.9 and Annex W Section V.D.,  
Annex W, Appendix 5, Section III.B.

Goliad County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

Refugio County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. identifies the Victoria County Public Information Officer and that he will coordinate emergency information with utility, State and local jurisdictions in the JIC.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. identifies the Goliad County Public Information Officer and that he will coordinate emergency information with utility, State and local jurisdictions in the JIC.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. identifies the Refugio County Public Information Officer and that he will coordinate information with utility, State and local jurisdictions in the JIC.

### **Plan Reference**

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

Victoria County:  
Basic Plan Section V.B.9 and Annex W Section V.D.,  
Annex W, Appendix 5, Section III.B.

Goliad County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

Refugio County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

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

### **Criterion Statement**

State of Texas: The plans are adequate. Procedures 13 and 14 indicate what organization is responsible for answering public inquiries and the method for contacting that organization.

Victoria County: Plans are adequate. The plan identifies the Victoria County Public Information Officer or his designee as the position in charge of rumor control. The plan identifies the rumor control phone bank and also the method for publicizing contact phone numbers.

Goliad County: Plans are adequate. The plan identifies the County Public Information Officer or his designee as the position in charge of rumor control. The plan identifies the rumor control phone bank and also the method for publicizing contact phone numbers.



Refugio County: Plans are adequate. Annex W Section V.D. is adequate. The plan identifies the County Public Information Officer or his designee as the position in charge of rumor control. The plan identifies the rumor control phone bank and also the method for publicizing contact phone numbers.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Chapter 2, Section III.B.2  
Annex I, Section IV. G. 1-2  
Procedure 13, Attachment 3

Victoria County:  
Basic Plan Section V.B.9 and Annex W Section V.D.,  
Annex I, Section VI  
Annex W, Appendix 5, Section III.B.

Goliad County:  
Annex I, Section VI  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

Refugio County:  
Annex I, Section VI  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. provides for an annual training program for media. It includes information about radiation, emergency plans and points of contact for media during an emergency.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. provides for an annual training program for media. It includes information about radiation, emergency plans and points of contact for media during an emergency.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Revision A, August 2008 is adequate. Annex W Section V.D. provides for an annual training program for media. It includes information about radiation, emergency plans and points of contact for media during an emergency.

## **Plan Reference**

State of Texas:  
Annex D, Tab 1, VII.A.14  
Annex D, Tab 1, Attachment 4, Section I.B.9  
Annex D, Tab 1, Attachment 4, Section II.A

Victoria County:  
Basic Plan Section V.B.9 and Annex W Section V.D.,  
Annex W, Appendix 5, Section III.B.

Goliad County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

Refugio County:  
Annex W Section V.D.,  
Annex W Tab 5, Section III.B.

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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, Texas, 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.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Operations Center located in the Victoria Annex in Victoria, Texas is the primary EOC. It is designated as the base for all emergency management activities. The County Judge/City Mayor assumes responsibility for all emergency operations/actions, and provides overall direction and control.

The County Judge/City Mayor, or the Emergency Management Coordinator, or his alternate will direct the set up and activation of the EOC. The Emergency Management Coordinator is responsible for preparing the EOC for activation and serves as the Senior EOC Operations Supervisor during activation. The County and all cities will coordinate their activities through the EOC.

The facility consists of a working area of 1000 square feet, offices, communications room, kitchen, dining area, bunking, and shower facilities. All necessary communications equipment is located at the Sheriff's Office (see Annex W, Appendix 2 for a detailed list). An emergency generator and fuel are in place for back-up power.

A Security Desk is located at the EOC entrance where all persons entering will be issued a pass. The County Courthouse is designated as the alternate EOC.

The General Plan contains ICS EOC interface guidelines. The Incident Commander is generally responsible for field operations. All operations will be coordinated through the EOC.

Goliad County: Plans are adequate. The Goliad County Emergency Operations Center located at the County Court House in Refugio is the primary EOC. The alternate EOC is located at the Sheriff's office. The EOC is designated as the base for all emergency management activities. The County Judge, or the Emergency Management Coordinator, or his alternate will direct the set up and activation of the EOC. The County and all cities will coordinate their activities through the EOC.

The County Judge is responsible for all emergency operations/actions, and provides overall direction and control. The Emergency Management Coordinator serves as the Senior EOC Operations Supervisor during activation.

The facility consists of a working area of 1000 square feet, offices, communications room, kitchen, dining area, bunking, and shower facilities. All necessary communications equipment is located at the Sheriff's Office (see Annex W, Tab 2 for a detailed list). An emergency generator and fuel are in place for back-up power.

A Security Desk is located at the EOC entrance where all persons entering will be issued a pass. The Refugio county Sheriff's Office is designated as the alternate EOC.

The General Plan contains ICS EOC interface guidelines. The Incident Commander is generally responsible for field operations. All operations will be coordinated through the EOC.

Refugio County: Plans are adequate. The Refugio County Emergency Operations Center located at the Refugio County Court House in Refugio is the primary EOC. It is designated as the base for all emergency management activities. The County Judge, or the Emergency Management Coordinator, or his alternate will direct the set up and activation of the EOC. The County and all cities will coordinate their activities through the EOC.

The County Judge is responsible for all emergency operations/actions, and provides overall direction and control. The Emergency Management

Coordinator serves as the Senior EOC Operations Supervisor during activation.

The facility consists of a working area of 1000 square feet, offices, communications room, kitchen, dining area, bunking, and shower facilities. All necessary communications equipment is located at the Sheriff's Office (see Annex W, Tab 2 for a detailed list). An emergency generator and fuel are in place for back-up power.

A Security Desk is located at the EOC entrance where all persons entering will be issued a pass. The Refugio county Sheriff's Office is designated as the alternate EOC.

The General Plan contains ICS EOC interface guidelines. The Incident Commander is generally responsible for field operations. All operations will be coordinated through the EOC.

### **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.A.2  
Procedure 11, Section VII.A.2

Victoria County:

Basic Plan Section V.E;  
Annex W Section III.A.12, IV.B and Tab 9 (All)

Goliad County:

Basic Plan Section V.E;  
Annex W Section III.A.12, IV.B and Tab 9 (All)

Refugio County:

Basic Plan Section V.E;  
Annex W Section III.A.12, IV.B and Tab 9 (All)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 VCS, and Field Operations. Other RCP teams for the first shift are deployed to their duty stations. During initial deployment of DSHS personnel, VCS will conduct necessary offsite monitoring.

Victoria County: Plans are adequate. Annex N describes the process for staffing and operating the EOC under various events or emergencies. The annex includes staffing rosters and levels at which particular activation of the EOC may be required.

Goliad County: Plans are adequate. Annex N describes the process for staffing and operating the EOC under various events or emergencies. The annex includes staffing rosters and levels at which particular activation of the EOC may be required.

Refugio County: Plans are adequate. Annex N describes the process for staffing and operating the EOC under various events or emergencies. The annex includes staffing rosters and levels at which particular activation of the EOC may be required.

**Plan Reference**

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

Victoria County:  
Basic Plan, Section V.E;  
Annex N;  
Annex W, Section VI;  
Annex W, Appendix I, Section IV.B

Goliad County:  
Basic Plan, Section V.E;  
Annex N;  
Annex W, Section VI;  
Annex W, Tab 1 Section IV.B

Refugio County:  
Basic Plan, Section V.E;  
Annex N;  
Annex W, Section VI;  
Annex W, Tab 1, Section IV.B

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan references "Accident Assessment" which is deferred to the State of Texas as the responsible entity for assessment of radiological incidents.

Goliad County: Plans are adequate. The plan references "Accident Assessment" which is deferred to the State of Texas as the responsible entity for assessment of radiological incidents.

Refugio County: Plans are adequate. The plan references "Accident Assessment" which is deferred to the State of Texas as the responsible entity for assessment of radiological incidents.

## **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

Victoria County:

Annex W, Section V.E; Field Monitoring deferred to State

Goliad County:

Annex W, Section V.E; Field Monitoring deferred to State

Refugio County:

Annex W, Section V.E; Field Monitoring deferred to State

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. The procedures 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 described in the locations identified by the cross-reference of the plan and procedures.

Victoria County: Plans are adequate. The Basic Plan indicates that the Emergency Management Coordinator maintains a resource inventory. The county plan states that the State DSHS Representative is responsible for obtaining, maintaining and distribution of personal dosimetry, protective equipment and monitoring equipment (Attachment 2, Emergency Radiological Equipment List) as required. DSHS is also responsible for inspecting, inventorying and operationally checking radiological equipment provided by the State at least every calendar quarter and after each use. Radiological monitoring devices provided by Victoria County Station are calibrated and maintained by the utility.

Goliad County: Plans are adequate. The Basic Plan indicates that the Emergency Management Coordinator maintains a resource inventory. The county plan states that the State DSHS Representative is responsible for obtaining, maintaining and distribution of personal dosimetry, protective equipment and monitoring equipment (Attachment 2, Emergency Radiological Equipment List) as required. DSHS is also responsible for inspecting, inventorying and operationally checking radiological equipment provided by the State at least every calendar quarter and after each use. Radiological monitoring devices provided by Victoria County Station are calibrated and maintained by the utility.

Refugio County: Plans are adequate. The Basic Plan indicates that the Emergency Management Coordinator maintains a resource inventory. The county plan states that the State DSHS Representative is responsible for obtaining, maintaining and distribution of personal dosimetry, protective equipment and monitoring equipment (Attachment 2, Emergency Radiological Equipment List) as required. DSHS is also responsible for inspecting, inventorying and operationally checking radiological equipment provided by the State at least every calendar quarter and after each use. Radiological monitoring devices provided by Victoria County Station are calibrated and maintained by the utility.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Attachment 4, Section I.B.10  
Procedure 10, Section VIII.C 1-4  
Procedure 10, Section VIII.C.1  
Procedure 11, Section VIII.C.1 and 5

Victoria County:  
Basic Plan, Section VI.B.3.c.4;  
Annex D, Section V  
Annex D Section IX,  
Annex D, Appendix 1  
Annex D, Appendix 4  
Annex W, Section V.M and V.M.3;  
Annex W, Appendix 4, Section IV.B

Goliad County:  
Basic Plan, Section VI.B.3.c.4;  
Annex D, Section V  
Annex D Section IX,  
Annex D, Appendix 1  
Annex D, Appendix 4  
Annex W, Section V.M and V.M.3;  
Annex W, Tab 4, Section IV.B

Refugio County:  
Basic Plan, Section VI.B.3.c.4;  
Annex D, Section V  
Annex D Section IX,  
Annex D, Appendix 1  
Annex D, Appendix 4  
Annex W, Section V.M and V.M.3;  
Annex W, Tab 4, Section IV.B

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: The plan contains one list for Emergency Radiological Equipment. The list does not contain number of items per kit or number of kits available. *Other emergency kits (communications, emergency supplies, etc.) are not mentioned in Section V.M or included in an attachment.*

Goliad County: Plans are adequate. The plan contains detailed lists inventory lists of various supply kits including quantities of inventory found in those kits.

Refugio County: Plans are adequate. The plan contains detailed lists inventory lists of various supply kits including quantities of inventory found in those 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 11, Section XII.A-E  
Procedure 24, Attachment 1  
Procedure 26, Section IV.A-K.

Victoria County:

Annex M, Section IX  
Annex M, Appendix 1,  
Annex M, Appendix 3  
Annex W, Section V.M  
Annex W, Attachment 2

Goliad County:  
Annex M, Section IX  
Annex M, Appendix 1,  
Annex M, Appendix 3  
Annex W, Section V.M, Figure 3  
Annex W, Attachment 2

Refugio County:  
Annex M, Section IX  
Annex M, Appendix 1,  
Annex M, Appendix 2  
Annex W, Section V.M  
Annex W, Attachment 2

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The County/City Plan Cross Reference and Section V.E refer to the State of Texas DSHS as the responsible entity for accident assessment, radiological monitoring or to supply radiological data to the State or utility. This section also has a reference to the Texas Radiological Emergency Management Plan and Procedures for additional subject matter information.

Goliad County: Plans are adequate. The County Plan Cross Reference and Section V.E refer to the State of Texas DSHS as the responsible entity for accident assessment, radiological monitoring or to supply radiological data to the State or utility. This section also has a reference to the Texas Radiological Emergency Management Plan and Procedures for additional subject matter information.

Refugio County: Plans are adequate. The County Plan Cross Reference and Section V.E refer to the State of Texas DSHS as the responsible entity for accident assessment, radiological monitoring or to supply radiological data to the State or utility. This section also has a reference to the Texas Radiological Emergency Management Plan and Procedures for additional subject matter information.

### **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

Victoria County:

Annex W, Section V.E (deferred to State)

Goliad County:

Annex W, Section V.E (deferred to State)

Refugio County:

Annex W, Section V.E (deferred to State)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria 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.

Goliad 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.

Refugio 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, 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

Annex D, Tab 1, Chapter 2, Attachments 2 & 3

Victoria County:

Annex W Section V.E

(Deferred to State)

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria 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.

Goliad 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.

Refugio 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

Victoria County:

Annex W Section V.E

(Deferred to State)

Goliad County:

Annex W Section V.E

(Deferred to State)

Refugio County:

Annex W Section V.E

(Deferred to State)

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 $\mu$ Ci/cc (micro curies 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  $\mu$ 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 included in the plan reference and is addressed in Section III of Procedure 10.

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio County: Not applicable.

### **Plan Reference**

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

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio County: Not applicable.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio 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.

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio 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

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio County: Not applicable.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not applicable

Goliad County: Not applicable

Refugio 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 State plan provides for locating and tracking the plume using State and/or Federal resources. The plan does specifically states that peak plume measurements will be taken by the utility in Procedure 10.

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio 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

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio County: Not applicable.

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not applicable.

Goliad County: Not applicable.

Refugio 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.]<sup>36</sup> 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 VCS.

Victoria County: Plans are adequate. Annex W Appendix 3 Section III.B.3 provides adequate information to make provisions for evacuation routes and transportation for onsite individuals and assigns responsibility of these provisions. If a request from the Emergency Director of VCS is received to assist with VCS personnel evacuation, then the Emergency Management Coordinator and Sheriff shall implement traffic and access control with coordination from all EOC positions affected by an evacuation action.

Goliad County: Plans are adequate. Annex W Tab 3 Section III.C provides adequate information to make provisions for evacuation routes and transportation for onsite individuals and assigns responsibility of these provisions. If a request from the Emergency Director of VCS is received to assist with VCS personnel evacuation, then the Emergency Management Coordinator and Sheriff shall implement traffic and access control with coordination from all EOC positions affected by an evacuation action.

Refugio County: Plans are adequate. Annex W Tab 3 Section III.B.3 provides adequate information to make provisions for evacuation routes and transportation for onsite individuals and assigns responsibility of these provisions. If a request from the Emergency Director of VCS is received to assist with VCS personnel evacuation, then the Emergency Management Coordinator and Sheriff shall implement traffic and access control with coordination from all EOC positions affected by an evacuation action.

### **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

Victoria County:  
Basic Plan Section V.B.7  
Annex W Section V.K.9  
Annex W Appendix 3 Section III.B.3  
Annex W, Tab 3, Section III.C

Goliad County:  
Basic Plan Section V.B.7  
Annex W Section V.K.9  
Annex W Tab 3 Section III.B.3  
Annex W, Tab 3, Section III.C

Refugio County:  
Basic Plan Section V.B.7  
Annex W Section V.K.9  
Annex W Tab 3 Section III.B.3  
Annex W, Tab 3, Section III.C

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 timeframe and method by which the PARs are communicated to local decision makers is stated in plans and procedures. Decisions regarding the implementation of

protective measures in the ingestion exposure pathway are delegated in the referenced portions of the State plan.

Victoria County: The plans and procedures provide for the development of Protective Action Recommendations (PARs) consistent with current Federal guidance to be deferred to the State. The plan contains detail on the implementation of PARs for the emergency phase of an accidental release, but it does not discuss implementations of recommendations during ingestion phase response. *The plan does not provide information regarding implementing decisions on contamination of human food and animal feeds.*

Goliad County: The plans and procedures provide for the development of Protective Action Recommendations (PARs) consistent with current Federal guidance to be deferred to the State. The plan contains detail on the implementation of PARs for the emergency phase of an accidental release, but it does not discuss implementations of recommendations during ingestion phase response. *The plan does not provide information regarding implementing decisions on contamination of human food and animal feeds.*

Refugio County: The plans and procedures provide for the development of Protective Action Recommendations (PARs) consistent with current Federal guidance to be deferred to the State. The plan contains detail on the implementation of PARs for the emergency phase of an accidental release, but it does not discuss implementations of recommendations during ingestion phase response. *The plan does not provide information regarding implementing decisions on contamination of human food and animal feeds.*

### **Plan Reference**

State of Texas:

Annex D, Section IV.A. 3-4

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

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

Victoria 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.O  
Annex W, Tab 3 All  
Annex W Appendix 4 All

Goliad 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.O  
Annex W, Tab 3 All  
Annex W Tab 4 All

Refugio 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.O  
Annex W, Tab 3 All  
Annex W Tab 4 All

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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.

Victoria County: Plans are adequate. The plan cross-reference provides information to maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.

Goliad County: Plans are adequate. The plan cross-reference provides information to maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.

Refugio County: Plans are adequate. The plan cross-reference provides information to maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.

### **Plan Reference**

State of Texas:

Annex D, Tab 1, Chapter 2, Attachment 5  
Annex D, Tab 1, Chapter 2, Attachment 4  
Annex D, Tab 1, Chapter 2, Attachment 3  
Annex D, Tab 1, Chapter 2, Attachment 9-10

Victoria County:

Annex W Figure 1  
Annex W Appendix 3  
(Defer to State for sample points)

Goliad County:

Annex W Figure 1  
Annex W Tab 3 Figure 1  
(Defer to State for sample points)

Refugio County:

Annex W Figure 1  
Annex W Tab 3 Figure 1  
(Defer to State for sample points)



### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 as well as special populations such as day cares and schools.

Victoria County: Plans are adequate. The plan provides a map showing population distribution by evacuation areas.

Goliad County: Plans are adequate. The plan provides a map showing population distribution by evacuation areas.

Refugio County: Plans are adequate. The plan provides a map showing population distribution by evacuation areas.

### **Plan Reference**

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

Victoria County: Annex W Appendix 3 figure 3

Goliad County: Annex W Tab 3 Figure 3

Refugio County: Annex W Tab 3 Figure 3

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

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

**Criterion Statement**

State of Texas: Plans are adequate. Procedure 14, referenced by the state plan, contains information related to establishing administrative and physical means, and times required for notifying and providing prompt instruction to the public within the EPZ. In addition, the plan's cross-reference points to information related to the drafting of information that would inform the public of protective actions consistent with the utility's Emergency Classification Level (ECL).

Victoria County: Plans are adequate. The Victoria County Sheriff's Office/City of Victoria 911 Center 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 (siren activation, alert radio activation, FIRST CALL Interactive Network, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over the local EAS radio stations, KXIX-FM (primary), KVIC-FM, KLUB-FM and KVNN-AM.

The plan states that the Victoria County Judge or City Mayor is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens are continuously monitored by a computer and the control point is at the Victoria County Sheriff's Office or city of Victoria 911 Center. The EAS is broadcast over four local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

The county plan states that the Public Information Officer (PIO), designated by the County Judge/City Mayor shall coordinate information and media releases with the County/City and appropriate government agencies. The PIO shall obtain approval and authorization for news

advisories and EAS messages containing information on recommended protective measures from the County Judge/City Mayor prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information.

Goliad County: Plans are adequate. The County Sheriff's Office/City of Victoria 911 Center 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 (siren activation, alert radio activation, FIRST CALL Interactive Network, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over the local EAS radio stations, KXIX-FM (primary), KVIC-FM, KLUB-FM and KVNN-AM.

The plan states that the County Judge or City Mayor is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens are continuously monitored by a computer and the control point is at the County Sheriff's Office or city of Victoria 911 Center. The EAS is broadcast over four local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

The county plan states that the Public Information Officer (PIO), designated by the County Judge/City Mayor shall coordinate information and media releases with the County/City and appropriate government agencies. The PIO shall obtain approval and authorization for news advisories and EAS messages containing information on recommended protective measures from the County Judge/City Mayor prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information.

Refugio County: Plans are adequate. The County Sheriff's Office/City of Victoria 911 Center 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 (siren activation, alert radio activation, FIRST CALL Interactive Network, cable television or route alerting) and the Emergency Alert System. Emergency notifications are broadcast over

the local EAS radio stations, KXIX-FM (primary), KVIC-FM, KLUB-FM and KVNN-AM.

The plan states that the County Judge or City Mayor is responsible for making the decision to activate the EAS. Warnings and notifications are made within 15 minutes of notification of an incident at VCS. The county has primary and alternate alerting and notification systems (EAS, siren activation, alert radio, etc). The sirens are continuously monitored by a computer and the control point is at the County Sheriff's Office or city of Victoria 911 Center. The EAS is broadcast over four local frequencies and route alerting is conducted by local law enforcement units as assigned by the Sheriff's Department. The siren testing procedures, "A biweekly silent, quarterly growl, and annual full cycle tests of the Prompt Notification System are conducted with the support of VCS".

The county plan states that the Public Information Officer (PIO), designated by the County Judge/City Mayor shall coordinate information and media releases with the County/City and appropriate government agencies. The PIO shall obtain approval and authorization for news advisories and EAS messages containing information on recommended protective measures from the County Judge/City Mayor prior to release. Tab 5, Attachment 1 consists of several Emergency Alert System Messages and News Advisories for the classification levels of Alert, SAE, and General Emergency which contain basic general information.

### **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

Victoria County:

Annex W Appendix 1 Section III

Annex W Appendix 1 Figure 1

All additional references listed under E.5, E.6, and E.7

Goliad County:

Annex W Tab 1 Section III

Annex W Tab 1 figure 1

All additional references listed under E.5, E.6, and E.7

Refugio County:

Annex W Tab 1 Section III

Annex W Tab 1 figure 1

All additional references listed under E.5, E.6, and E.7

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan does provide for the Red Cross to maintain a list of residents that do not have transportation. The plan also includes a cross-reference that identifies a list of all special facilities in the EPZ of Victoria County.

Goliad County: Plans are adequate. The plan does provide for the Red Cross to maintain a list of residents that do not have transportation. The plan states that there are no special facilities in the EPZ for Goliad County.

Refugio County: Plans are adequate. The plan does provide for the Red Cross to maintain a list of residents that do not have transportation. The plan states that there are no special facilities in the EPZ.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Section VII, A.13  
Procedure 9, Section VIII.A (last sentence.)  
Annex E, Section IV.C.4  
Annex E, Section IV.I  
Annex E, Section IV.J.1.d

Annex H, Section IV.A.7.c  
Annex H, Section V.3.e.3

Victoria County:  
Annex W section V.D.13  
Annex W Appendix 7 sections IV.C and D  
Annex W, Appendix 3, Section III.D  
Annex W Appendix 8 Section III.B  
Evacuation Time Estimate Study, Sections 3.3, 5.1.3 and 6.0

Goliad County:  
Annex W Section V.D.13  
Annex W, Tab 3, Section III.D  
Annex W Tab 8 Section III.B  
Evacuation Time Estimate Study, Sections 3.3, 5.1.3 and 6.0

Refugio County:  
Annex W section V.D.13  
Annex W Tab 7 Sections IV.C and D  
Annex W, Tab 3, Section III.D  
Annex W Tab 8 Section III.B  
Evacuation Time Estimate Study, Sections 3.3, 5.1.3 and 6.0

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 plans clearly state the quantities of KI and provide information on where and how the inventory should be stored. The plan also indicates how the recommendation to ingest KI to emergency workers and institutionalized individuals will be communicated to the county.

Victoria County: Plans are adequate. The county plan defers the responsibility for this criterion to the State. The plans states that exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

Goliad County: Plans are adequate. The county plan defers the responsibility for this criterion to the State. The plans states that exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

Refugio County: Plans are adequate. The county plan defers the responsibility for this criterion to the State. The plans states that exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

### **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 VIII.A (last sentence)  
Procedure 9, Section V. E-G  
Procedure 9, Attachment 3

Victoria County: Not Applicable

Goliad County: Annex W Section V.M.2

Refugio County: Annex W Section V.M.2  
(Deferred to State)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

Goliad County: Plans are adequate. Exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

Refugio County: Plans are adequate. Exposure control is primarily the function of the DSHS, including recommendations to use, and provisions for radioprotective drugs; however, the County Environmental Health Director will provide radiological monitoring assistance and dosimetry issue and control.

### **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

Victoria County: Not Applicable

Goliad County: Annex W Section V.M.2  
(Deferred to State)

Refugio County: Annex W Section V.M.2  
(Deferred to State)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan provides information on the means to relocate the public, transportation resources, and designates responsibility.

Goliad County: Plans are adequate. The plan provides information on the means to relocate the public, transportation resources, and designates responsibility.

Refugio County: Plans are adequate. The plan provides information on the means to relocate the public, transportation resources, and designates responsibility.

## **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

Victoria County: Annex W Section V.K

Annex W Appendix 8 Section III

Annex W Appendix 3 Figures 1 and 3

Goliad County: Annex W Section V.K

Annex W Tab 8 Section III

Annex W Tab 3 Figures 1 and 3

Refugio County: Annex W Section V.K

Annex W Tab 8 Section III

Annex W Tab 3 Figures 1 and 3

## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: The referenced portion of the plan identifies Victoria Community Center 2905 East North Street Victoria, Texas as the North Reception Center and Refugio Fair Grounds 110 Fairgrounds Road Refugio, Texas as the South Reception Center. The referenced portion of the plan makes provisions for the radiological monitoring for evacuees. In addition, *information in the plan could not be found to address students who are sent to relocation centers nor was there additional information related to hospitals, prisons, nursing homes and other facilities who may receive evacuees. This detailed information is to be included in procedures not yet developed. Procedures will be provided for review prior to the qualifying exercise.*

Goliad County: The referenced portion of the plan identifies Victoria Community Center 2905 East North Street Victoria, Texas as the North Reception Center and Refugio Fair Grounds 110 Fairgrounds Road Refugio, Texas as the South Reception Center. The referenced portion of the plan makes provisions for the radiological monitoring for evacuees. *In addition, information in the plan could not be found to address students who are sent to relocation centers nor was there additional information related to hospitals, prisons, nursing homes and other facilities who may receive evacuees. This detailed information is to be included in procedures not yet developed. Procedures will be provided for review prior to the qualifying exercise.*

Refugio County: The referenced portion of the plan identifies Victoria Community Center 2905 East North Street Victoria, Texas as the North Reception Center and Refugio Fair Grounds 110 Fairgrounds Road Refugio, Texas as the South Reception Center. The referenced portion of the plan makes provisions for the radiological monitoring for evacuees. *In addition, information in the plan could not be found to address students who are sent to relocation centers nor was there additional information related to hospitals, prisons, nursing homes and other facilities who may receive evacuees. This detailed information is to be included in procedures not yet developed. Procedures will be provided for review prior to the qualifying exercise.*

### **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

Victoria County:

Annex W Appendix 7 Figure 1

Goliad County:  
Annex W, Tab 3, III.E

Refugio County:  
Annex W Tab 7 Figure 1

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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.

Victoria County: Plans are adequate. The plan provides supporting information of the criterion in Annex W Appendix 3 Section III.C. The plan references the Evacuation Time Estimate and provides information from that document to satisfy the criterion.

Goliad County: Plans are adequate. The plan provides supporting information of the criterion in Annex W Tab 3 Section III.C. The plan references the Evacuation Time Estimate and provides information from that document to satisfy the criterion.

Refugio County: Plans are adequate. The plan provides supporting information of the criterion in Annex W Tab 3 Section III.C. The plan references the Evacuation Time Estimate and provides information from that document to satisfy the criterion.

### **Plan Reference**

State of Texas:  
Procedure1, Section VII.D (last sentence)  
Annex E, Section IV.C.3

Victoria County: Annex W Appendix 3 Section III.C  
Annex W Appendix 3 Figure 2

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: The organizations responsible for controlling access to evacuated areas and the setup of the TCPs/ACPs are identified in the plan. *The plan does not provide information regarding the equipment that is necessary to set up access control points. This information is to be included in Annex M of the plan, but the item will not be completed until fuel load. Plan updates will be provided to FEMA for review prior to the qualifying exercise approximately 4/1/15.*

Goliad County: The organizations responsible for controlling access to evacuated areas and the setup of the TCPs/ACPs are identified in the plan. *The plan does not provide information regarding the equipment that is necessary to set up access control points. The plan does not provide information regarding the equipment that is necessary to set up access control points. This information is to be included in Annex M of the plan, but the item will not be completed until fuel load. Plan updates will be provided to FEMA for review prior to the qualifying exercise approximately 4/1/15.*

Refugio County: The organizations responsible for controlling access to evacuated areas and the setup of the TCPs/ACPs are identified in the plan. *The plan does not provide information regarding the equipment that is necessary to set up access control points. The plan does not provide information regarding the equipment that is necessary to set up access control points. This information is to be included in Annex M of the plan, but the item will not be completed until fuel load. Plan updates will be provided to FEMA for review prior to the qualifying exercise approximately 4/1/15.*

### **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

Victoria County:

Basic Plan Section VI.B.5.g

Annex W Section V.I

Annex W Appendix 3 Section III.C

Goliad County:

Basic Plan Section VI.B.5.g

Annex W Section V.I

Annex W Tab 3 Section III.C

Refugio County:

Basic Plan Section VI.B.5.g

Annex W Section V.I

Annex W Tab 3 Section III.C

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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 designate Law Enforcement personnel responsible for directing and rerouting traffic.

Victoria County: Plans are adequate. The plan provides information regarding equipment available to clear impediments to evacuation and emergency response in affected areas.

Goliad County: Plans are adequate. The plan provides a link to the Texas Regional Response Network (TRRN) which is a database used to locate and obtain resources to, among many other things, provides information regarding equipment available to clear impediments to evacuation and emergency response in affected areas.

Refugio County: Plans are adequate. The plan provides information regarding equipment available to clear impediments to evacuation and emergency response in affected areas.

**Plan Reference**

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

Victoria County: Annex W Appendix 3 Section III.C.6

Goliad County: Annex W Tab 3 III.C.6

Refugio County: Annex W Tab 3 III.C.6

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

J.10.I 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.

Victoria County: Plans are adequate. The plan identifies sub areas 1-8 within the 10 mile EPZ and provides time estimates for evacuation of the sub areas in Annex W Appendix 3 Figure 2.

Goliad County: Plans are adequate. The plan identifies sub area 9 as the only sub area within the 10 mile EPZ that resides in Goliad County. The plan provides the time estimates for evacuation for that sub area.

Refugio County: Plans are adequate. The plan identifies 11 sub areas within the 10 mile EPZ and provides time estimates for evacuation of the sub areas in Annex W Tab 3 Figure 2.

### **Plan Reference**

State of Texas:  
Evacuation Time Estimate

Victoria County:  
Annex W Appendix 3 Section III.C  
Annex W Appendix 3 Section III.F  
Annex W Appendix 3 Figure 2

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

Refugio 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**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

**Plan Reference**

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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

- 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 plan identifies a specific individual (by title and/or position) that has 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 (Procedure 10).

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not Applicable

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: *The plan does not provide facility layouts for the reception centers.*

Goliad County: *The plan does not provide facility layouts for the reception centers.*

Refugio County: *The plan does not provide facility layouts for the reception centers.*

### **Plan Reference**

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

Victoria County:  
Annex W Appendix 3 Section III.E  
Annex W Appendix 7 Section IV.B

Goliad County:  
Annex W, Tab 3, Section III.E

Refugio County:  
Annex W Tab 3 Section III.E  
Annex W Tab 7 Section IV.B

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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. Procedure 7 of the State plans provides for determination of doses received and for distribution of dosimeters (both self-reading and permanent record) and indicates quantities of dosimetry that must be maintained or where the dosimetry is stored (ready for issue).

Victoria County: The county plan requires dosimetry to be provided to emergency workers by the environmental health director. Dosimeters are to be read at frequencies specified by State guidelines and dose records are to be maintained in accordance with State guidelines. *The county plans contain no specific reference to what the State guidelines are; there is no detail related to the quantities of dosimetry (permanent record or direct reading) that should be maintained; nor is there an indication as to where the dosimetry is stored.*

Goliad County: The county plan requires dosimetry to be provided to emergency workers by the environmental health director. Dosimeters are to be read at frequencies specified by State guidelines and dose records are to be maintained in accordance with State guidelines. *The county plans contain no specific reference to what the State guidelines are; there is no detail related to the quantities of dosimetry (permanent record or direct reading) that should be maintained; nor is there an indication as to where the dosimetry is stored.*

Refugio County: The county plan requires dosimetry to be provided to emergency workers by the environmental health director. Dosimeters are to be read at frequencies specified by State guidelines and dose records are to be maintained in accordance with State guidelines. *The county plans contain no specific reference to what the State guidelines are; there is no detail related to the quantities of dosimetry (permanent record or direct reading) that should be maintained; nor is there an indication as to where the dosimetry is stored.*

## **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 4<sup>th</sup> paragraph)  
Procedure 7, Section 2  
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

Victoria County:  
Annex W Section V.M

Goliad County:  
Annex W Section V.M

Refugio County:  
Annex W Section V.M

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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. Procedure 7 contains specific details with respect to procedures for obtaining dose information, frequency to read dosimeters (“periodically”), and record keeping. Additionally the procedures detail actions to be taken when administrative exposure levels have been reached (or exceeded). The procedure requires dosimeters to be read at specific time intervals.

Victoria 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.”

Goliad 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.”

Refugio 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.”

**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

Victoria County:  
Annex W Section V.M

Goliad County:  
Annex W Section V.M

Refugio County:  
Annex W Section V.M

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**  
The plans defer to the State.

Goliad County: **Adequate**  
The plans defer to the State.

Refugio County: **Adequate**  
The plans defer to the State.

- 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 provides information on risks for those emergency workers who voluntarily exceed the limits, such as a pregnant emergency worker.

Victoria County: Plans are adequate. 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. Annex W, Section V., Subsection A.9, addresses Protective Action Guides (PAGs) for emergency workers, and to describe the decision chain for authorization to exceed the PAG for the exposure of emergency workers.

Goliad County: Plans are adequate. 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. Annex W, Section V., Subsection A.9, addresses Protective Action Guides (PAGs) for emergency workers, and to describe the decision chain for authorization to exceed the PAG for the exposure of emergency workers.

Refugio County: Plans are adequate. 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. Annex W, Section V., Subsection A.9, addresses Protective Action Guides (PAGs) for emergency workers, and to describe the decision chain for authorization to exceed the PAG for the exposure of emergency workers.

### **Plan Reference**

State of Texas:

Procedure 1, Attachments 3-4  
Procedure 7, Section VII.B  
Procedure 7, Section VII.A&C  
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

Victoria County:

Annex W Section V.A.9  
Annex W Section V.M



Goliad County:  
Annex W Section V.A.9  
Annex W Section V.M

Refugio County:  
Annex W Section V.A.9  
Annex W Section V.M

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: 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 plans defer to the state plans and procedures for information that describes the procedure for monitoring of personnel or equipment, controlling the spread of contamination, and identify instruments that are expected to be used for this task. *This statement of deferral is only provided in the cross-reference and does not clearly state what portions of this criterion are being deferred. Clarification needs to be provided as to what activities are being deferred to the state.*

Goliad County: 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 plans defer to the state plans and procedures for information that

describes the procedure for monitoring of personnel or equipment, controlling the spread of contamination, and identify instruments that are expected to be used for this task. *This statement of deferral is only provided in the cross-reference and does not clearly state what portions of this criterion are being deferred. Clarification needs to be provided as to what activities are being deferred to the state.*

Refugio County: 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 plans defer to the state plans and procedures for information that describes the procedure for monitoring of personnel or equipment, controlling the spread of contamination, and identify instruments that are expected to be used for this task. *This statement of deferral is only provided in the cross-reference and does not clearly state what portions of this criterion are being deferred. Clarification needs to be provided as to what activities are being deferred to the state.*

### **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-D

Victoria County:

Annex W Tab 3 Section III.B and III.E

Annex W, Tab 7, Figure 1

Goliad County:

Annex W Tab 3 Section III.B and III.E

Annex W, Tab 7, Figure 1

Refugio County:

Annex W Tab 3 Section III.B and III.E

Annex W, Tab 7, Figure 1

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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.

Victoria County: 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 plan does not, however, address 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. Though medical provisions have been planned for, the criteria used for determining when a person should be sent for medical treatment is not identified in the plan.*

Goliad County: 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 plan does not, however, address 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. Though medical provisions have been planned for, the criteria used for determining when a person should be sent for medical treatment is not identified in the plan.*

Refugio County: 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 plan does not, however, address 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. Though medical provisions have been planned for, the criteria used for determining when a person should be sent for medical treatment is not identified in the plan.*

### **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

Victoria County:  
Annex W Section V.J  
Annex W Section V.M  
Annex W Appendix 3 Section III.D  
Annex W Appendix 7 Section IV.B.3

Goliad County:  
Annex W Section V.J  
Annex W Section V.M  
Annex W Tab 3 Section III.D

Refugio 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**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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.

Victoria County: *The plan should include the capability to monitor, radiation exposure and uptake, include ensuring emergency workers are adequately prepared to handle contaminated individuals.*

Goliad County: *The plan should include the capability to monitor radiation exposure and uptake; include ensuring emergency workers are adequately prepared to handle contaminated individuals.*

Refugio County: *The plan should include the capability to monitor radiation exposure and uptake; include ensuring emergency workers are adequately prepared to handle contaminated individuals.*

### **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

Victoria County:  
Annex W Section V.J

Goliad County:  
Annex W Section V.J

Refugio County:  
Annex W Section V.J

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

### **Plan Reference**

State of Texas:  
Procedure 5, Attachment 2.

Victoria County:  
Not Applicable

Goliad County:  
Annex W Section V.J.9

Refugio County:  
Not applicable

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not applicable

Refugio 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 procedures listed in the cross-reference include a method for determining a hospital or medical facility to treat victims of radiological accidents, as well as information on transporting radiologically contaminated victims to medical support facilities.

Victoria County: This is a greenfield site and the procedure listed in the cross-reference does not exist. *Plans do not include detailed information that designates emergency transportation and alternate medical services and transportation for radiological contaminated injured victims and must be included.*

Goliad County: This is a greenfield site and the procedure listed in the cross-reference does not exist. *Plans do not include detailed information that designates emergency transportation and alternate medical services and transportation for radiological contaminated injured victims and must be included.*

Refugio County: This is a greenfield site and the procedure listed in the cross-reference does not exist. *Plans do not include detailed information that designates emergency transportation and alternate medical services and transportation for radiological contaminated injured victims and must be included.*

### **Plan Reference**

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

Victoria County:  
Annex W Section V.J.9

Goliad County:  
Annex W Section V.J.9

Refugio County:  
Annex W Section V.J.9



## **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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 D, 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.

Victoria County: Plans are adequate. Annex W, Section VI., Subsection E.2, includes the requirement for Recovery/Return procedures, and Attachments 4 and 5 specify the applicable Recovery/Return procedures and Exclusionary and Restricted Zone Operating procedures, respectively.

Goliad County: Plans are adequate. Annex W, Section VI., Subsection E.2, includes the requirement for Recovery/Return procedures, and Attachments 4 and 5 specify the applicable Recovery/Return procedures and Exclusionary and Restricted Zone Operating procedures, respectively.

Refugio County: Plans are adequate. Annex W, Section VI., Subsection E.2, includes the requirement for Recovery/Return procedures, and Attachments 4 and 5 specify the applicable Recovery/Return procedures

and Exclusionary and Restricted Zone Operating procedures, respectively.

**Plan Reference**

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

Victoria County:  
Annex W Section VI.E

Goliad County:  
Annex W Section VI.E

Refugio County:  
Annex W Section VI.E

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable.

**Plan Reference**

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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

**Plan Reference**

State of Texas:  
Procedure 1, Section VII.D

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate. The plan addresses exercises that simulate an emergency resulting in offsite releases in accordance with NRC and FEMA rules.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate – corrections must be made. The plan addresses exercises

that simulate an emergency resulting in offsite releases in accordance with NRC and FEMA rules.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate – corrections must be made. The plan addresses exercises that simulate an emergency resulting in offsite releases in accordance with NRC and FEMA rules.

### **Plan Reference**

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

Victoria County: Annex W Tab 6 Section III.E

Goliad County: Annex W Tab 6 Section III.E

Refugio County: Annex W Tab 6 Section III.E

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate. It provides that the county will participate in exercises every two years and ingestion exercises at least every six years. The plan says the exercises will vary in both seasons and scenarios so that all conditions and all responders will participate. All major aspects of the plans/procedures will be exercised at least once every six years.

Goliad County: Plans are adequate. The Goliad County Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate. It provides that the county will participate in exercises every two years and ingestion exercises at least every six years. The plan says the exercises will vary in both seasons and scenarios so that all conditions and all responders will participate. All major aspects of the plans/procedures will be exercised at least once every six years.

Refugio County: Plans are adequate. The Refugio County Emergency Management Plan Annex W Tab 6 Section III.E Revision A, August 2008 is adequate. It provides that the county will participate in exercises every two years and ingestion exercises at least every six years. The plan says the exercises will vary in both seasons and scenarios so that all conditions and all responders will participate. All major aspects of the plans/procedures will be exercised at least once every six years.

## **Plan Reference**

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

Victoria County: Annex W Tab 6 Section III.E

Goliad County: Annex W Tab 6 Section III.E

Refugio County: Annex W Tab 6 Section III.E

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. It details that the county will test its communications systems locally once a month. It will test its communications systems with the State and Federal emergency response organizations at least quarterly. The county's communications systems that interface with field teams, the State and utility will be tested at least annually. The plan specifies that part of these communications drills involves a message content check.

Goliad County: Plans are adequate. It details that the county will test its communications systems locally once a month. It will test its communications systems with the State and Federal emergency

response organizations at least quarterly. The county's communications systems that interface with field teams, the State and utility will be tested at least annually. The plan specifies that part of these communications drills involves a message content check.

Refugio County: Plans are adequate. It details that the county will test its communications systems locally once a month. It will test its communications systems with the State and Federal emergency response organizations at least quarterly. The county's communications systems that interface with field teams, the State and utility will be tested at least annually. The plan specifies that part of these communications drills involves a message content check.

### **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.

Victoria County: Annex W Tab 6 Section III.D

Goliad County: Annex W Tab 6 Section III.D

Refugio County: Annex W Tab 6 Section III.D

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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

Victoria County: *Cross-contamination, communication between ambulance and medical facility, dosimetry, staffing and treatment vs. decontamination guidance requirements are not covered in this reference.*

Goliad County: *Cross-contamination, communication between ambulance and medical facility, dosimetry, staffing and treatment vs. decontamination guidance requirements are not covered in this reference.*

Refugio County: *Cross-contamination, communication between ambulance and medical facility, dosimetry, staffing and treatment vs. decontamination guidance requirements are not covered in this reference.*

### **Plan Reference**

State of Texas: Not applicable

Victoria County:  
Annex W Tab 6 Section III.

Goliad County:  
Annex W Tab 6 Section III.

Refugio County:  
Annex W Tab 6 Section III.

### **Criterion Evaluation**

State of Texas: Not applicable

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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 requirement for radiological monitoring drills has been adequately addressed in the plan.

Victoria County: Plans are adequate. The county plans indicate that radiological monitoring is primarily the responsibility of the Department of State Health Services (DSHS). Counties will have limited participation in radiological monitoring.

Goliad County: Plans are adequate. The referenced section of the plan addresses radiological monitoring drills. There is a note in the plan that addresses the requirement and states that the DSHS has the primary responsibility to perform radiological monitoring.

Refugio County: Plans are adequate. The referenced section of the plan addresses radiological monitoring drills. There is a note in the plan that addresses the requirement and states that the DSHS has the primary responsibility to perform radiological monitoring.

**Plan Reference**

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

Victoria County:  
Annex W Appendix 6 Section III.D.1.e

Goliad County:  
Annex W Tab 6 Section III.D.1.e

Refugio County:  
Annex W Tab 6 Section III.D.1.e

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 reference indicates that the State will participate in health physics drills semi-annually.

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

**Plan Reference**

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

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio County: Not applicable

**Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: Not Applicable

Goliad County: Not Applicable

Refugio 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 section, Drills and Exercises, states that objectives will be addressed in the scenario developed for exercises and drills.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will meet basic objectives.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will meet basic objectives.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will meet basic objectives.

**Plan Reference**

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

Victoria County:  
Annex W, Tab 6, Section III

Goliad County:  
Annex W, Tab 6, Section III

Refugio County:  
Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will dates, times, places and participating organizations.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will dates, times, places and participating organizations.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will dates, times, places and participating organizations.

### **Plan Reference**

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

Victoria County: Annex W, Tab 6, Section III

Goliad County: Annex W, Tab 6, Section III

Refugio County: Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

N.3.c The simulated events;

### **Criterion Statement**

State of Texas: Plans are adequate. The plan indicates that simulated events, exercise timelines, and narrative summaries will be addressed in the scenario developed for exercises and drills. In addition, it contains a statement that advanced materials will be provided to official observers.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will list simulated events.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will list simulated events.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will list simulated events.

### **Plan Reference**

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

Victoria County: Annex W, Tab 6, Section III

Goliad County: Annex W, Tab 6, Section III

Refugio County: Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 or event schedules will be addressed in the scenario developed for exercises and drills.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a time schedule (timeline) of real and simulated initiating events.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a time schedule (timeline) of real and simulated initiating events.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a time schedule (timeline) of real and simulated initiating events.

### **Plan Reference**

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

Victoria County: Annex W, Tab 6, Section III

Goliad County: Annex W, Tab 6, Section III

Refugio County: Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 contains a statement that indicates that narrative summaries will be addressed in the scenario developed for exercises and drills.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a narrative summary containing items like simulated casualties, fire department(s) participation, rescue of personnel, public information activities, and use of radiological monitoring teams and protective clothing.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a narrative summary containing items like simulated casualties, fire department(s) participation, rescue of personnel, public information activities, and use of radiological monitoring teams and protective clothing.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a narrative summary containing items like simulated casualties, fire department(s) participation, rescue of personnel, public information activities, and use of radiological monitoring teams and protective clothing.



### **Plan Reference**

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

Victoria County:  
Annex W, Tab 6, Section III

Goliad County:  
Annex W, Tab 6, Section III

Refugio County:  
Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 contains a statement that advanced materials will be provided to official observers.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a description of the arrangements for advance materials to be provided to official observers.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a description of the arrangements for advance materials to be provided to official observers.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says drill and exercise scenarios will include a description of the arrangements for advance materials to be provided to official observers.

### **Plan Reference**

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

Victoria County:  
Annex W, Tab 6, Section III

Goliad County:  
Annex W, Tab 6, Section III

Refugio County:  
Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Victoria County Annex W, Tab 6, Section III is adequate. The plan says official observers from Federal, State or local governments will observe, evaluate and critique required exercises to determine organizations' abilities to respond as required by plans. The critique shall be scheduled as soon as possible after the exercise. A formal evaluation report shall result from the critique.

Goliad County: Plans are adequate. Goliad County Annex W, Tab 6, Section III is adequate. The plan says official observers from Federal, State or local governments will observe, evaluate and critique required exercises to determine organizations' abilities to respond as required by plans. The critique shall be scheduled as soon as possible after the exercise. A formal evaluation report shall result from the critique.

Refugio County: Plans are adequate. Refugio County Annex W, Tab 6, Section III is adequate. The plan says official observers from Federal, State or local governments will observe, evaluate and critique required exercises to determine organizations' abilities to respond as required by plans. The critique shall be scheduled as soon as possible after the exercise. A formal evaluation report shall result from the critique.

### **Plan Reference**

State of Texas:  
Annex D, Tab 1, Attachment 4, IIA

Victoria County:  
Annex W, Tab 6, Section III

Goliad County:  
Annex W, Tab 6, Section III

Refugio County:  
Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. Drill and exercise information was in the plan includes the process or implementing corrective actions resulting from evaluations.

Goliad County: Plans are adequate. Drill and exercise information was in the plan includes the process or implementing corrective actions resulting from evaluations.

Refugio County: Plans are adequate. Drill and exercise information was in the plan includes the process or implementing corrective actions resulting from evaluations.

### **Plan Reference**

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

Victoria County:  
Annex W Appendix 6 Section III.G

Goliad County:  
Annex W Tab 6 Section III.G

Refugio County:  
Annex W Tab 6 Section III.G

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan states that training will be provided for all personnel that are part of the response effort. This statement is intended to apply to county personnel as well as responders who participate as part of mutual aid agreements.

Goliad County: Plans are adequate. The plan states that training will be provided for all personnel that are part of the response effort. This statement is intended to apply to county personnel as well as responders who participate as part of mutual aid agreements.

Refugio County: Plans are adequate. The plan states that training will be provided for all personnel that are part of the response effort. This statement is intended to apply to county personnel as well as responders who participate as part of mutual aid agreements.

### **Plan Reference**

State of Texas:  
Annex D, Section V.B.1.a and g  
Annex D, Appendix 2, Section 1.a.2 and 3  
Annex D, Tab 1, Attachment 4, Section I.a

Victoria County:  
Annex W, Appendix 6, Section III

Goliad County:  
Annex W, Tab 6, Section III

Refugio County:  
Annex W, Tab 6, Section III

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 Senior Manager in DSHS.

Victoria County: The plan provides that a training program will be conducted for directors or coordinators. This will be the responsibility of the Emergency Management Coordinator. *The plan does not provide information that describes the scope, nature or frequency of such training.*

Goliad County: The plan provides that a training program will be conducted for directors or coordinators. This will be the responsibility of the Emergency Management Coordinator. *The plan does not provide information that describes the scope, nature or frequency of such training.*

Refugio County: The plan provides that a training program will be conducted for directors or coordinators. This will be the responsibility of the Emergency Management Coordinator. *The plan does not provide information that describes the scope, nature or frequency of such training.*

### **Plan Reference**

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

Victoria County:  
Annex W Appendix 6 Section III.C.3.a

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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).

Victoria County: Plans are adequate. The plan provides adequate information regarding the specialized initial training and periodic retraining programs (including the scope, nature, and frequency) for personnel responsible for accident assessment.

Goliad County: Plans are adequate. The plan defers this responsibility to the Department of State Health Services (DSHS).

Refugio County: Plans are adequate. The plan defers this responsibility to the Department of State Health Services (DSHS).

### **Plan Reference**

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

Victoria County: Annex W Section V.E

Goliad County: Annex W Section V.E (deferred to State)

Refugio County: Annex W Section V.E (deferred to State)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

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

### **Criterion Statement**

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

Victoria County: The county plan is adequate. The plan provides adequate information regarding the specialized initial training and periodic retraining programs (including the scope, nature, and frequency) for radiological monitoring teams and radiological analysis personnel.

Goliad County: The county plan is adequate. The plan defers this responsibility to the Department of State Health Services (DSHS).



Refugio County: The county plan is adequate. The plan defers this responsibility to the Department of State Health Services (DSHS).

### **Plan Reference**

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

Victoria County: Annex W Section V.E

Goliad County: Annex W Section V.E (deferred to State)

Refugio County: Annex W Section V.E (deferred to State)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

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

### **Criterion Statement**

State of Texas: Plans are adequate. The plan contains a Pre-disaster Activities Preparedness Appendix which includes required training for police, security, and firefighting personnel. Training consists of exercises, drills, TEPP, and response specific training in accordance with the NRP guidelines. This element is reviewed and updated as required and must be NIMS compliant. Tab 1 contains information on the scope, nature, and frequency of training for first responders.

Victoria County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for police, security and fire fighting personnel.*

Goliad County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this

element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for police, security and fire fighting personnel.*

Refugio County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for police, security and fire fighting personnel.*

### **Plan Reference**

State of Texas:  
Annex D, Appendix 2, Section 1.a.2  
Annex D, Tab 4, Section I.F.1

Victoria County:  
Annex W, Tab 6, Section III c.3.b

Goliad County:  
Annex W, Tab 6, Section III c.3.b

Refugio County:  
Annex W, Tab 6, Section III c.3.b

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

O.4.f First aid and rescue personnel;

### **Criterion Statement**

State of Texas: Plans are adequate. The plan contains a Pre-disaster Activities Preparedness Appendix which includes required training for

first aid and rescue personnel. Training consists of exercises, drills, TEPP, and response specific training in accordance with the NRP guidelines. This element is reviewed and updated as required and must be NIMS compliant. Tab 1 contains information on the scope, nature, and frequency of training for first responders.

Victoria County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for first aid and rescue personnel.*

Goliad County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for first aid and rescue personnel.*

Refugio County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for first aid and rescue personnel.*

### **Plan Reference**

State of Texas:

Annex D, Appendix 2, Section 1.a.2 and 5  
Annex D, Tab 1, Attachment 4, Section I.F.2

Victoria County:

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

Goliad County:

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

Refugio County:

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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

### **Criterion Statement**

State of Texas: Plans are adequate. Tab 1 contains information on the scope, nature, and frequency of training for first responders.

Victoria County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for local support services personnel including Civil Defense/Emergency Services personnel.*

Goliad County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for local support services personnel including Civil Defense/Emergency Services personnel.*

Refugio County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4. *Initial and refresher training, scope, nature of training, and frequency of training is not included the plan for local support services personnel including Civil Defense/Emergency Services personnel.*

### **Plan Reference**

State of Texas:

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

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

Victoria County:

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

Goliad County:

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

Refugio County:

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

O.4.h Medical support personnel;

### **Criterion Statement**

State of Texas: Plans are adequate. The plan contains a Pre-disaster Activities Preparedness Appendix which includes required training for medical support personnel. Training consists of exercises, drills, TEPP, and response specific training in accordance with the NRP guidelines. This element is reviewed and updated as required and must be NIMS compliant. Tab 1 contains the scope, nature or frequency of the initial and periodic retraining programs.

Victoria County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.h. *The plan does not include any*

*specific information with respect to the scope, nature and frequency of the required training.*

Goliad County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.h. Additional information related to both initial and refresher training, scope, nature of training, and frequency of training is found in other sections of the plan, but was not included as part of the plan's cross-reference for this standard. *The plan does not include any specific information with respect to the scope, nature and frequency of the required training.*

Refugio County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.h. Additional information related to both initial and refresher training, scope, nature of training, and frequency of training is found in other sections of the plan, but was not included as part of the plan's cross-reference for this standard. *The plan does not include any specific information with respect to the scope, nature and frequency of the required training.*

### **Plan Reference**

State of Texas:  
Annex D, Appendix 2, Section 1.a.2 & 5  
Annex D, Tab 1, Attachment 4, Section I.F.4

Victoria County:  
Annex W, Appendix 6, Section III.C.3.e

Goliad County:  
Annex W, Tab 6, Section III.C.3.e

Refugio County:  
Annex W, Tab 6, Section III.C.3.e

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

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

### **Criterion Statement**

State of Texas: Plans are adequate. The plan describes specific training for various response teams including the Public Information Coordination Team. Team members are selected because of academic or professional experience and additional training consists of (1) courses conducted by Emergency Planners; (2) work sessions with the utility PIO coordinators; and (3) participation in exercises and drills. Tab 1 contains the scope, nature or frequency of the initial and periodic retraining programs.

Victoria County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.j. *Information related to both initial and refresher training, scope, nature of training, and frequency of training is not addressed.*

Goliad County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.j. *Information related to both initial and refresher training, scope, nature of training, and frequency of training is not addressed.*

Refugio County: This element of the planning standard is addressed in the plan, but the cross-reference is too limiting as it references only a one line sentence, which is insufficient for the requirements of this element of Planning Standard O.4.j. *Information related to both initial and refresher training, scope, nature of training, and frequency of training is not addressed.*

### **Plan Reference**

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

Victoria County:  
Annex W, Appendix 6, Section III.C.3.f

Goliad County:  
Annex W, Tab 6, Section III.C.3.f

Refugio County:  
Annex W, Tab 6, Section III.C.3.f

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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.

Victoria 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.

Goliad 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.



Refugio 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.A-B.

Victoria County:  
Annex W, Appendix 6, Section III.A

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. In Section V, Assignments of Responsibilities, individuals assigned to Task A, "Direction and Control" are tasked with cooperating with the State and VCS in completing exercises, drills and training programs as requested to assure emergency response and preparedness capabilities. Annex W, Section V., Subsection A.8, describe responsibility for radiological emergency response planning and the training provided to radiological emergency response planners, individuals responsible for developing/updating emergency plans/procedures, and any other positions with planning responsibilities.

Goliad County: Plans are adequate. In Section V, Assignments of Responsibilities, individuals assigned to Task A, "Direction and Control" are tasked with cooperating with the State and VCS in completing exercises, drills and training programs as requested to assure emergency response and preparedness capabilities. Annex W, Section V., Subsection A.8, describe responsibility for radiological emergency response planning and the training provided to radiological emergency response planners, individuals responsible for developing/updating emergency plans/procedures, and any other positions with planning responsibilities.

Refugio County: Plans are adequate. In Section V, Assignments of Responsibilities, individuals assigned to Task A, "Direction and Control" are tasked with cooperating with the State and VCS in completing exercises, drills and training programs as requested to assure emergency response and preparedness capabilities. Annex W, Section V., Subsection A.8, describe responsibility for radiological emergency response planning and the training provided to radiological emergency response planners, individuals responsible for developing/updating emergency plans/procedures, and any other positions with planning responsibilities.

### **Plan Reference**

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

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

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The Basic Plan states that the Executive Group, County Judge, Mayors, City Manager, and emergency Management Coordinator, provides guidance and direction for emergency management programs. The Basic Plan for the county designates the Emergency Management Coordinator as the individual responsible for coordination and maintenance of the plan.

Goliad County: Plans are adequate. The Basic Plan states that the Executive Group, County Judge, Mayors, City Manager, and emergency Management Coordinator, provides guidance and direction for emergency management programs. The Basic Plan for the county designates the Emergency Management Coordinator as the individual responsible for coordination and maintenance of the plan.

Refugio County: Plans are adequate. The Basic Plan states that the Executive Group, County Judge, Mayors, City Manager, and emergency Management Coordinator, provides guidance and direction for emergency management programs. The Basic Plan for the county designates the Emergency Management Coordinator as the individual responsible for coordination and maintenance of the plan.

### **Plan Reference**

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

Victoria County:  
Basic Plan, Section VI.A.2; Annex W, Section IV.A.1

Goliad County:  
Basic Plan, Section VI.A.2; Annex W, Section IV.A.1

Refugio County:  
Basic Plan, Section VI.A.2; Annex W, Section IV.A.1

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. A Radiation Control Program staff member is designated as the Emergency Management Coordinator (EMC) who is directly responsible for the development, maintenance, and distribution of Annex D.

Victoria County: Plans are adequate. The Victoria County/City of Victoria Emergency Management Coordinator is responsible for annual review/updates of the Basic Plan which includes Annex W, all Appendices, Attachments and Procedures.

Goliad County: Plans are adequate. The Goliad County Emergency Management Coordinator is responsible for annual review/updates of the Basic Plan which includes Annex W, all Tabs, Attachments and Procedures.

Refugio County: Plans are adequate. The Refugio County Emergency Management Coordinator is responsible for annual review/updates of the Basic Plan which includes Annex W, all Tabs, Attachments and Procedures.

### **Plan Reference**

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

Victoria County: Basic Plan, Section VI.A.2; Annex W, Section XII

Goliad County: Basic Plan, Section VI.A.2; Annex W, Section XII

Refugio County: Basic Plan, Section VI.A.2; Annex W, Section XII

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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 2008 ALC submittal.

Victoria County: Plans are adequate. Annex W, Appendices 1-9 contain a statement that the plan will be reviewed annually, and updated if necessary, as a result of use, audits, and drill/exercise critiques. The plan also includes a statement that the plans and supporting documents including LOAs will be reviewed and updated on an annual basis. In addition, the plan contains a statement that defers the responsibility of the ALC to the state.

Goliad County: Plans are adequate. Annex W, Tabs 1-9 contain a statement that the plan will be reviewed annually, and updated if necessary, as a result of use, audits, and drill/exercise critiques. The plan also includes a statement that the plans and supporting documents including LOAs will be reviewed and updated on an annual basis. In addition, the plan contains a statement that defers the responsibility of the ALC to the state.

Refugio County: Plans are adequate. Annex W, Tabs 1-9 contain a statement that the plan will be reviewed annually, and updated if necessary, as a result of use, audits, and drill/exercise critiques. The plan also includes a statement that the plans and supporting documents including LOAs will be reviewed and updated on an annual basis. In addition, the plan contains a statement that defers the responsibility of the ALC to the state.

### **Plan Reference**

State of Texas:  
Annex D, Section X.C

Victoria County:  
Basic Plan Section X  
Annex W, Section XII  
Annex W, Appendix 1.VIII,  
Appendix 2.VII,  
Appendix 3.VII,  
Appendix 4.VI,  
Appendix 5.VI,  
Appendix 6.VI,  
Appendix 7.VIII,  
Appendix 8.VIII,  
and Appendix 9.X  
State Certification Letter deferred to State

Goliad County:  
Basic Plan Section X  
Annex W, Section XII  
Annex W, Tab 1.VIII,  
Tab 2.VII,  
Tab 3.VII,  
Tab 4.VI,  
Tab 5.VI,  
Tab 6.VI,  
Tab 8.VIII,

and Tab 9.X  
State Certification Letter deferred to State

Refugio County: Basic Plan Section X  
Annex W, Section XII  
Annex W, Tab 1.VIII,  
Tab 2.VII,  
Tab 3.VII,  
Tab 4.VI,  
Tab 5.VI,  
Tab 6.VI,  
Tab 8.VIII,  
and Tab 9.X  
State Certification Letter deferred to State

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. Tab 1 to Annex D contains a list of agencies that receive plan distributions and updates.

Victoria County: Plans are adequate. Annex W, Distribution List (page W-ii), specifies the distribution requirements and page revision markings. The list will be populated two years prior to fuel load on approximately 4/1/15. In addition, the plans include a statement that all revisions will be dated and marked to show where changes have been made.

Goliad County: Plans are adequate. Annex W, Distribution List (page W-ii), specifies the distribution requirements and page revision markings. The list will be populated two years prior to fuel load on approximately 4/1/15. In addition, the plans include a statement that all revisions will be dated and marked to show where changes have been made.

Refugio County: Plans are adequate. Annex W, Distribution List (page W-ii), specifies the distribution requirements and page revision markings. The list will be populated two years prior to fuel load on approximately 4/1/15. In addition, the plans include a statement that all revisions will be dated and marked to show where changes have been made.

### **Plan Reference**

State of Texas:  
Annex D. Section V.B.2.d  
Annex D. Section X.B  
Annex D, Appendix I  
Annex D, Tab 1, Section IV

Victoria County:  
Annex W, Distribution Listing

Goliad County:  
Annex W, Distribution Listing

Refugio County:  
Annex W, Distribution Listing

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. Tab I, Attachment 5 contains a list of supporting plans.

Victoria County: Plans are adequate. Both the Basic Plan and Annex W provide a list of supporting plan.



Goliad County: Plans are adequate. Both the Basic Plan and Annex W provide a list of supporting plan.

Refugio County: Plans are adequate. Both the Basic Plan and Annex W provide a list of supporting plan.

### **Plan Reference**

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

Victoria County:  
Basic Plan, Section I; Annex W, Section I

Goliad County:  
Basic Plan, Section I;  
Annex W, Section I

Refugio County:  
Basic Plan, Section I;  
Annex W, Section I

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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. Tab 1, Attachment 6 contains a procedural cross-reference.

Victoria County: *This list will be contained in Annex W Appendix 11 which has not yet been developed. This appendix will be completed and provided to FEMA for review two years prior to initial fuel load (i.e., 04/01/15; initial fuel load tentatively scheduled for 04/01/17).*

Goliad County: *This list will be contained in Annex W Appendix 11 which has not yet been developed. This appendix will be completed and provided to FEMA for review two years prior to initial fuel load (i.e., 04/01/15; initial fuel load tentatively scheduled for 04/01/17).*

Refugio County: *This list will be contained in Annex W Appendix 11 which has not yet been developed. This appendix will be completed and provided to FEMA for review two years prior to initial fuel load (i.e., 04/01/15; initial fuel load tentatively scheduled for 04/01/17).*

### **Plan Reference**

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

Victoria County: Annex W, Appendix 11 (List of Implementing Procedures to be developed)

Goliad County: Annex W, Tab 11 (List of Implementing Procedures to be developed)

Refugio County: Annex W, Tab 11 (List of Implementing Procedures to be developed)

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **See Post COL Reasonable Assurance Tracking Form**

Goliad County: **See Post COL Reasonable Assurance Tracking Form**

Refugio County: **See Post COL Reasonable Assurance Tracking Form**

- 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 for the NUREG 0654 Cross-reference.

Victoria County: Plans are adequate. The plan contains a "Table of Contents" and a "Cross Reference".

Goliad County: Plans are adequate. The plan contains a "Table of Contents" and a "Cross Reference".

Refugio County: Plans are adequate. The plan contains a "Table of Contents" and a "Cross Reference".

### **Plan Reference**

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

Victoria County: Annex W; Annex W, Appendix 10

Goliad County: Annex W; Annex W, Tab 10

Refugio County: Annex W; Annex W Tab 10

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio 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.

Victoria County: Plans are adequate. The plan states that telephone and radio call lists are contained in the EOC Telephone Directory. The lists are reviewed and revised quarterly.

Goliad County: Plans are adequate. The plan states that telephone and radio call lists are contained in the EOC Telephone Directory. The lists are reviewed and revised quarterly.

Refugio County: Plans are adequate. The plan states that telephone and radio call lists are contained in the EOC Telephone Directory. The lists are reviewed and revised quarterly.

### **Plan Reference**

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

Victoria County: Annex W, Appendix 1, Section IV.F

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

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

### **Criterion Evaluation**

State of Texas: **Adequate**

Victoria County: **Adequate**

Goliad County: **Adequate**

Refugio County: **Adequate**

### III. Post COL Reasonable Assurance Tracking

This tracking form includes elements that will be completed during the period between the issuing of the combined license and the qualifying exercise. Certain NUREG-0654 evaluation criteria are dependent on things that may not yet exist during the pre-licensing period for new sites, such as facilities or letters of agreement with support organizations.

When a new reactor is added at an existing operating site, plans, procedures, and training are already in place. However, when a new reactor is built at a new site, some or all of the municipalities within the new site's EPZ will not have existing radiological emergency plans.

These municipalities must adopt and complete the proposed plans prepared by the utility, develop detailed procedures, and train responders prior to conducting the qualifying joint exercise. During this period, FEMA works in partnership with State, local, and Tribal governmental and private organizations to create and implement plans, procedures, and training programs.

Time Frame <sup>1</sup>	Evaluation Criterion <sup>2</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>3</sup>	Resolution Description and Date
E-24	A.3 Goliad County	Written mutual aid agreements must be developed.	
E-24	C.4 Goliad County	Written letters of agreement must be developed.	
	E.7 Goliad, Refugio, and Victoria Counties	Procedures to be established containing copies of pre-scripted messages. Implementing procedures 10, 60, and 63 for public information should be established two years prior to fuel load. (3.c.1)	
	H.11 Victoria County	Identify emergency kits that will be used including description of inventory, quantities of items, and number of kits two years prior to fuel load. (4.a.1)	

<sup>1</sup> E - x = Months prior to fuel load

<sup>2</sup> NUREG 0654 FEMA-REP-1 Rev 1

<sup>3</sup> Federal Register Vol. 67 No. 80, April 25, 2002

Time Frame <sup>1</sup>	Evaluation Criterion <sup>2</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>3</sup>	Resolution Description and Date
	J.9 Goliad, Refugio, and Victoria Counties	Provide procedure that describes implementation of decisions with regard to contamination of human food and animal feed.	
	J.10.h Goliad, Refugio and Victoria Counties	Establish plans or procedures that describe arrangements for school children that are evacuated to reception centers. In addition, provide information on facilities such as nursing homes and hospitals who will receive evacuees.(6.a.1; 6.c.1)	
	J.10.j Goliad, Refugio, and Victoria Counties	Establish procedures that describe equipment and resources that will be utilized to set up traffic control points two years prior to fuel load. (3.d.1)	
	J.12 Goliad, Refugio, and Victoria Counties	Establish procedures that include facility layouts for identified reception centers. (6.a.1; 6.c.1)	
	K.3.a Goliad, Refugio, and Victoria Counties	Establish procedures for dosimetry including quantities to be maintained and storage locations two years prior to fuel load. (1.e.1; 3.a.1)	
	K.5.a Goliad, Refugio and Victoria Counties	Establish implementing procedures for monitoring and decontamination centers.(6.a.1)	
	K.5.b Goliad, Refugio, and Victoria Counties	Establish procedures for monitoring and decontamination of persons or equipment and documentation of contamination readings. In addition, include criteria to determine when a person should be sent for medical treatment.(6.b.1)	
	L.1 and L.4 Goliad, Refugio, and Victoria Counties	Establish procedures that meet the requirements outlined in MS-1 guidance two years prior to fuel load. (6.d.1)	
	N.2.c Goliad, Refugio, and Victoria Counties	Establish procedures on communication between medical facilities and ambulance, controlling contamination, dosimetry, staffing, treatment, and decontamination of contaminated injured patients. (6.d.1)	

Time Frame <sup>1</sup>	Evaluation Criterion <sup>2</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>3</sup>	Resolution Description and Date
	O.4.a, O.4.d, O.4.f, O.4.g, O.4.h, O4.j Goliad, Refugio, and Victoria Counties	Provide description of training programs including the scope, nature and frequency for each of the listed criteria.	
	P.7 Goliad, Refugio, and Victoria Counties	Develop Procedure Index which identifies what portions of the plan will be implemented by each procedure.	
	Multiple Criterion Apply	Finalize Tab 1, Chapter 3 which of the state plan that addresses site specific planning for the proposed Victoria County Station.	

#### IV. Criterion 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 Victoria County, Version 2, May 2009. Any blank spaces in the table below will be evaluated prior to the IFR of Reasonable Assurance on Adequacy of Offsite Radiological Emergency Response Preparedness

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		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	
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		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	
E.5	adequate	J.10.g	adequate	O.4.b	adequate
E.6	adequate	J.10.h		O.4.c	adequate
E.7		J.10.i	adequate	O.4.d	
F.1.a	adequate	J.10.j		O.4.f	
F.1.b	adequate	J.10.k	adequate	O.4.g	
F.1.c	adequate	J.10.l	adequate	O.4.h	
F.1.d	adequate	J.10.m	not applicable	O.4.j	
F.1.e	adequate	J.11	not applicable	O.5	adequate
F.2	adequate	J.12		P.1	adequate
F.3	adequate	K.3.a		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		P.5	adequate
G.4.a	adequate	K.5.b		P.6	adequate
G.4.b	adequate	L.1		P.7	
G.4.c	adequate	L.3	not applicable	P.8	adequate
G.5	adequate	L.4		P.10	adequate

C. Emergency Management Plan for Goliad County, Version 2, May 2009. Any blank spaces in the table below will be evaluated prior to the IFR of Reasonable Assurance on Adequacy of Offsite Radiological Emergency Response Preparedness

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

D. Emergency Management Plan for Refugio County, Version 2, September 2009. Any blank spaces in the table below will be evaluated prior to the IFR of Reasonable Assurance on Adequacy of Offsite Radiological Emergency Response Preparedness

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	
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		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	
E.5	adequate	J.10.g	adequate	O.4.b	adequate
E.6	adequate	J.10.h		O.4.c	adequate
E.7		J.10.i	adequate	O.4.d	
F.1.a	adequate	J.10.j		O.4.f	
F.1.b	adequate	J.10.k	adequate	O.4.g	
F.1.c	adequate	J.10.l	adequate	O.4.h	
F.1.d	adequate	J.10.m	not applicable	O.4.j	
F.1.e	adequate	J.11	not applicable	O.5	adequate
F.2	adequate	J.12		P.1	adequate
F.3	adequate	K.3.a		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		P.5	adequate
G.4.a	adequate	K.5.b		P.6	adequate
G.4.b	adequate	L.1		P.7	
G.4.c	adequate	L.3	not applicable	P.8	adequate
G.5	adequate	L.4		P.10	adequate

## V. ACRONYMS 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
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