



FEMA

Ms. Nancy J. Dragani  
Executive Director  
Ohio Emergency Management Agency  
2855 West Dublin-Granville Road  
Columbus, OH 43235-2206

Dear Ms. Dragani:

This is to inform you of the U.S. Department of Homeland Security/Federal Emergency Management Agency's identification of a Deficiency finding during the Beaver Valley Power Station's Radiological Emergency Preparedness (REP) Full Participation Plume Exposure Pathway Exercise, conducted on April 20, 2010.

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

The State received a Deficiency finding under *Plume Phase Field Measurements and Analyses* Criterion 4.a.2 – Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

The Deficiency assessed was based on our findings that out of the three State Field Monitoring Teams (FMT), only State FMT #1 (Unit 14) received the message that a release of radioactive materials had started and that the State Department of Health had ordered the ingestion of potassium iodide (KI) for all emergency workers in the 10-mile emergency planning zone (controller injects). State FMT #2 (Unit 15) received the information regarding the release of radioactive materials, but not the instruction to ingest KI. State FMT #3 (Unit 13) received neither the information that a release of radioactive materials was occurring, nor the instruction to ingest KI. There was a problem identified with the handheld radio being used by the FMT (sticking button), which led the FMT to use a back-up method (cell phone), all three field teams acknowledged that they "copied" the message that was provided by the FMT Coordinator after his radio broadcast, but the FMT Coordinator did not verify that the field teams had understood that a release of radioactive materials had occurred or that the FMTs had ingested KI. All three FMTs performed radiation measurements and collected air samples while immersed in the plume after the instruction to ingest KI should have been received. More detailed information regarding Criterion 4.a.2 performance is included in the enclosed narrative.

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The State also received an ARCA finding under *Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency* Criterion 2.b.1 – Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions.

An ARCA is defined by DHS/FEMA as an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety.

The ARCA was based on our findings that the State of Ohio Dose Assessment Team did not demonstrate a reliable capability to independently validate dose projections provided by the licensee or Columbiana County. Dose projections by the State of Ohio Dose Assessment Team were approximately three times higher than that of the licensee and Columbiana County. More detailed information regarding Criterion 2.b.1 performance is included in the enclosed narrative.

Because of the potential impact this Deficiency and ARCA have on public health and safety, a remedial exercise is required. For criteria 4.a.2, this exercise is to be demonstrated within 120 days after the conclusion of the exercise date (April 20, 2010). For criteria 2.b.1 training of Dose Assessment Staff must occur within the next 90 days, and the demonstration will be evaluated at the Perry Nuclear Power Plant Partial Participation Exercise on September 28, 2010. These issues were presented to the exercise participants as well as State Staff during the post-exercise Participants' Meeting conducted on April 23, 2010 and subsequent phone calls during the week of April 25, 2010.

Please submit a Schedule of Corrective Actions (SCA), including the date, time and identification of those organizations and participants by title that will participate in the remedial exercise and training: no later than 20 days following the exercise (May 10, 2010).

We have thoroughly reviewed and discussed these issues with DHS FEMA Headquarters and the U.S. Nuclear Regulatory Commission (NRC).

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact William E. King, Chairman, Regional Assistance Committee, at (312) 408-5575.

Sincerely,



Janet M. Odeshoo  
Acting Regional Administrator