



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

December 1, 2010

Michael Perito
Site Vice President
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River Bend Station
5485 US Highway 61N
St. Francisville, LA 70775

SUBJECT: CLOSURE OF THE HOMELAND SECURITY OFFSITE DEFICIENCY
IDENTIFIED DURING THE JUNE 8, 2010, RIVER BEND STATION
BIENNIAL EMERGENCY PREPAREDNESS EXERCISE

Dear Mr. Perito:

Enclosed is a copy of Federal Emergency Management Agency's (FEMA) Region VI's After Action Report/Improvement Plan, dated August 25, 2010. The After Action Report discusses the successful demonstration on July 14, 2010, of correction actions for an exercise deficiency identified during evaluation of the June 8, 2010, River Bend Station Biennial Emergency Preparedness Exercise. Specifically, the deficiency was related to implementing Criterion 5.a.1, Activation of the Prompt Alert and Notification System, and had been assessed against the Parishes of East Baton Rouge, East Feliciana, and Point Coupee. Information about this deficiency had previously been communicated to River Bend Station in a letter, dated July 12, 2010.

The purpose of this letter is to communicate FEMA's official notification that the previously-identified deficiency has been corrected. No response to the Nuclear Regulatory Commission is required. The NRC appreciates the efforts by River Bend Station, made in coordination with offsite governmental agencies, which resulted in a timely resolution of this issue.


In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Entergy Operations, Inc.

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If you have any further questions, please contact Paul Elkmann at (817) 276-6539 or Gilbert L. Guerra at (817) 276-6557.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Shannon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Shannon, Chief
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Division of Reactor Safety

Docket: 05000458
License: NPF-47

Enclosure:
FEMA Region VI After Action Report, dated August 25, 2010
(ADAMS Accession No.: ML103090581)

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River Bend Station

After Action Report/ Improvement Plan

Exercise Date - June 08, 2010

Radiological Emergency Preparedness (REP) Program



FEMA

Published August 25, 2010

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River Bend Station After Action Report/Improvement Plan

Published August 25, 2010

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EXECUTIVE SUMMARY

On June 8-9, 2010, a biennial Radiological Emergency Preparedness (REP) exercise consisting of both the Plume Exposure Pathway, 10-mile Emergency Planning Zone (EPZ) and 50-mile Ingestion Pathway Emergency Planning Zone (IPZ) was conducted around the River Bend Station (RBS), located near St. Francisville, Louisiana. Personnel from the U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) Region VI, evaluated all activities. The purpose of the exercise was to assess the level of preparedness of local responders to react to a simulated radiological emergency at RBS. It was held in accordance with FEMA's policies and guidance concerning the implementation of state and local REP plans and procedures.

The previous exercise at this site was conducted on June 11, 2008. The first qualifying exercise to satisfy FEMA rule 44 Code of Federal Regulations (CFR) 350 requirements for Nuclear Regulatory Commission (NRC) licensing to operate the facility was conducted in January 1985. Including the exercise on June 8, 2010, there have been fifteen DHS/FEMA Region VI evaluated exercises plus several drills conducted since then.

FEMA Region VI wishes to acknowledge the efforts of the many individuals in the State of Louisiana, West Feliciana, East Feliciana, Pointe Coupee, East Baton Rouge and West Baton Rouge Parishes who participated in this exercise. Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. Cooperation and teamwork of all the participants was evident during this exercise.

This report includes the identification of any exercise issues and recommendations for corrective action where appropriate.

All state and local organizations, except where noted in this report, demonstrated an adequate knowledge of the emergency response plans and procedures and properly implemented them. There were three Deficiencies, no Areas Requiring Corrective Action (ARCA), and six Plan Issues identified during the exercise.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

River Bend Station

Type of Exercise

Ingestion

Exercise Date

June 08, 2010

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

Scenario Type

Radiological Emergency

1.2 Exercise Planning Team Leadership

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1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the River Bend Station exercise:

State Jurisdictions

- Governor's Office of Homeland Security and Emergency Preparedness
- Louisiana Department of Agriculture and Forestry
- Louisiana Department of Environmental Quality
- Louisiana Department of Transportation and Development
- Louisiana Department of Health and Hospitals
- Louisiana Department of Social Services
- Louisiana State Police
- Louisiana State University Agricultural Center/ Extension Services
- Louisiana Department of Wildlife and Fisheries

Risk Jurisdictions

- East Baton Rouge Parish
- East Baton Rouge Council on Aging
- East Baton Rouge Emergency Medical Services
- East Baton Rouge Fire Department
- East Baton Rouge Health Unit
- East Baton Rouge School Board

East Baton Rouge Office of Family Support
East Baton Rouge Parish Homeland Security and Emergency Preparedness
East Baton Rouge Parish School Board
East Baton Rouge Social Services
East Baton Rouge Sheriff's Office
Zachary Community School District
East Feliciana Parish
East Feliciana Parish Homeland security and Emergency Preparedness
East Feliciana Parish Fire Department
East Feliciana Parish School Board
East Feliciana Parish Sheriff's Office
Pointe Coupee Parish
Point Coupee Parish Homeland Security and Emergency Preparedness
Point Coupee School Board
City of New Roads
West Baton Rouge Parish
West Baton Rouge Parish Homeland Security and Emergency Preparedness
West Baton Rouge Fire Department
West Baton Rouge Sheriff's Office
West Baton Rouge School Board
Port Allen City Police
Port Allen Fire Department
West Feliciana Parish
West Feliciana Parish Homeland Security and Emergency Preparedness
West Feliciana Parish Sheriff's Office
West Feliciana Emergency Ambulance Service
West Feliciana Parish Fire Department
West Feliciana Parish Council of Aging
West Feliciana Parish Hospital
West Feliciana Office of Family Support
West Feliciana School Board
St. Francisville Police Department
St. Francisville Volunteer Fire Department
Town of St. Francisville

Private Organizations

American Red Cross

Entergy Operations, Inc. (River Bend Station)

Radio Amateur Civil Emergency Services (RACES)

Federal Jurisdictions

Nuclear Regulatory Commission

Federal Emergency Management Agency

Department of Energy Federal Radiological Monitoring and Assessment Center

Department of Agriculture

Environmental Protection Agency

Food and Drug Administration

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

The DHS/FEMA Region VI Office evaluated the exercise on June 8-9, 2010 to assess the capabilities of local emergency preparedness organizations in implementing their Radiological Emergency Response Plans and Procedures to protect the public health and safety during a radiological emergency involving River Bend Station (RBS). The purpose of this report is to represent the results and findings on the performance of the offsite response organizations during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and identified Capabilities/REP Criteria selected to be exercised are discussed in the Exercise Plan (EXPLAN), Appendix E.

2.3 Scenario Summary

The exercise scenario was developed to evaluate the response of exercise participants to an incident requiring evacuation of the public from the 10-mile Emergency Planning Zone and 50-mile Ingestion Pathway Emergency Planning Zone surrounding the River Bend Station (RBS). The exercise scenario provided for the evaluation of the State, Louisiana Department of Environmental Quality, East and West Baton Rouge, East and West Feliciana and Pointe Coupee Parishes, and Port Allen Fire Protection Sub-District 3 to conduct evacuations, re-entry/return/relocation, and monitoring and decontamination of emergency workers and equipment.

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Exercise Evaluation and Results

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the June 8, 2010 exercise to test the offsite emergency response capabilities of state and local governments in the 10-mile Emergency Planning Zone and 50-mile Ingestion Planning Zone surrounding the River Bend Station.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of criteria delineated in the exercise evaluation areas as outlined in the April 25, 2002, Federal Register, Radiological Emergency Preparedness: Evaluation Methodology. Detailed information on the exercise evaluation area criteria and the extent of play agreement used in this exercise are found in an Appendix of this report.

3.2 Summary Results of Exercise Evaluation

The matrix presented in Table 3.1, on the following page, presents the status of all exercise evaluation area criteria that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status is indicated by the use of the following letters:

M - Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior exercises)

D - Deficiency assessed

A - ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)

P - Plan Issue

N - Not Demonstrated

Table 3.1 - Summary of Exercise Evaluation

DATE: 2010-06-08 SITE: River Bend Station, LA M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated																	
		GOHSEP EOC	LDEQ HQ	LDEQ EOF	LDEQ FMT 1	LDEQ FMT 2	RB Alt. JIC	E. Baton Rouge Parish	PHCA	E. Feliciana Parish	Pointe Coupee Parish	W. Baton Rouge Parish	WBRP M&D	W. Feliciana Parish	EAS Station	WJBO	
Emergency Operations Management																	
Mobilization	1a1	M	M	M			M	M	M	M	M		M				
Facilities	1b1											M					
Direction and Control	1c1	M	M	M			M		M	M	M		M				
Communications Equipment	1d1	M	M	M	M	M	M	M	M	M	M		M				
Equip & Supplies to support operations	1e1	M	M	M	M	M	M	M	M	M	M	M	M				
Protective Action Decision Making																	
Emergency Worker Exposure Control	2a1	M		M			M		M	M	M		M				
Radiological Assessment and PARs	2b1	M		M													
Decisions for the Plume Phase -PADs	2b2	M					M		M	M	M		M				
PADs for protection of special populations	2c1						M		M	M	M		M				
Rad Assessment and Decision making for the Ingestion Exposure Pathway	2d1			M													
Rad Assessment and Decision making concerning Relocation, Reentry, and Return	2e1			M			M		M	M	M		M				
Protective Action Implementation																	
Implementation of emergency worker exposure control	3a1			M	M	M	P	M	M	M	M	M	M	M			
Implementation of KI decision	3b1				M	M	M		M	M	M		M				
Implementation of protective actions for special populations - EOCs	3c1						M		M	M	M		M				
Implementation of protective actions for Schools	3c2							M									
Implementation of traffic and access control	3d1						M		M	M	M		M				
Impediments to evacuation are identified and resolved	3d2						M		M	M	M		M				
Implementation of ingestion pathway decisions - availability/use of info	3e1			M													
Materials for Ingestion Pathway PADs are available	3e2			M													
Implementation of relocation, re-entry, and return decisions.	3f1						M		M	M	M		M				
Field Measurement and Analysis																	
Adequate Equipment for Plume Phase Field Measurements	4a1				M	M											
Field Teams obtain sufficient information	4a2			M													
Field Teams Manage Sample Collection Appropriately	4a3				M	M											
Post plume phase field measurements and sampling	4b1				M	M											
Laboratory operations	4c1																
Emergency Notification and Public Info																	
Activation of the prompt alert and notification system	5a1	M					M		M	M	M		M	M			
Activation of the prompt alert and notification system - Fast Breaker	5a2																
Activation of the prompt alert and notification system - Exception areas	5a3															M	
Emergency information and instructions for the public and the media	5b1	M					M	M	M	M	M		M				
Support Operations/Facilities																	
Mon / decon of evacuees and emergency workers, and registration of evacuees	6a1												M				
Mon / decon of emergency worker equipment	6b1												M				
Temporary care of evacuees	6c1																
Transportation and treatment of contaminated injured individuals	6d1																

3.3 Criteria Evaluation Summaries

3.3.1 Louisiana Jurisdictions

3.3.1.1 Governor's Office of Homeland Security and Emergency Preparedness

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.2 Louisiana Department of Environmental Quality Headquarters

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.3 Louisiana Department of Environmental Quality EOF

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.d.1, 2.e.1, 3.a.1, 3.e.1, 3.e.2, 4.a.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.4 Louisiana Department of Environmental Quality Field Monitoring Team One

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.3, 4.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.5 Louisiana Department of Environmental Quality Field Monitoring Team Two

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.3, 4.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.6 River Bend Alternate Joint Information Center

- a. MET: 1.a.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2 Risk Jurisdictions

3.3.2.1 East Baton Rouge Parish Emergency Operations Center and Traffic/Access Control Point

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 2.e.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 3.f.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: 5.a.1.

ISSUE NO.: 53-10-5a1-D-03

CRITERION: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite officials to notify the public of an emergency situation. (10 CFR Part 50, Appendix E & NUREG-0654, E.1.,4.,5.,6.,7.)

CONDITION: Sirens were not activated (simulated) by the parishes as required at 1111 and 1208. The EAS messages, Scenario #8 and #22, were broadcasted as scheduled by the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) at 1114 and 1211. Three of the five parishes simulated siren activation at the agreed upon time of 1111 prior to transmittal of the first EAS message, two parishes (Pointe Coupee and East Baton Rouge Parishes) believed that the siren activation was being completed at an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility). When the Protective Action Decision was revised later in the exercise, arrangements were made again to activate the sirens for alerting at 1208 to precede the transmission of the EAS message at GOHSEP that was scheduled for 1211. For this siren activation, three parishes (Pointe Coupee, East Baton Rouge, and East Feliciana Parishes) believed the sirens were being activated in an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility).

POSSIBLE CAUSE: There is the possibility that the parishes may have been confused during the coordination call. The call also included discussion of the exception area alerting that was being conducted by helicopter (for the FEMA approved exception areas) and the approval for that alerting by West Feliciana Parish.

REFERENCE: NUREG-0654/FEMA-REP-1, E.6; and LPRRP, Attachment III, Enclosures 1-5.

EFFECT: Sirens were not activated (simulated) at the designated times by the all of the parishes as required to alert the public to the broadcast of the EAS messages.

This incomplete EAS process could result in members of the public being unaware of the protective actions that were being implemented and may result in a negative impact on public health and safety.

It should be noted that the licensee (by procedure) monitors siren activation by the parishes to confirm siren activation at the scheduled time. The licensee maintains the ability to sound sirens in the event of a failure at the parish and they would activate the sirens if requested by the parish. The licensee would contact the parish if the siren activation was not completed as required. Because the sirens were not actually activated (for exercise purposes) this back-up process was not implemented and could not be verified by the evaluators.

CORRECTIVE ACTION DEMONSTRATED: The East Baton Rouge Parish (EBRP) Emergency Operations Center (EOC) located at 3773 Harding Blvd., Baton Rouge, Louisiana 70807 re-demonstrated the activation of the sirens on July 14, 2010. The Parish Director and Mayor-President were responsible for making PADs for the EBRP population.

The River Bend Station (RBS) Siren Control Box and keys are located in the Communications Room across the hall from the EOC. The siren activation was simulated once during the drill. The procedures binders and SOPs were available for use in activating the sirens.

Message #1 with a PAR and Scenario #1 were received via fax from RBS at 1101, stating a general emergency had been declared at the plant. A follow-up call was received over the RBS Hotline confirming the fax information and to obtain concurrence from each Parish Director on the siren activation at 1115.

The Parish Director and Mayor-President immediately reviewed the procedures and Scenario #1 for necessary actions. The director prepared for the siren activation (simulated), she used the checklist (Attachment #7) to complete the process. The director followed up with a phone call to the Louisiana Department of Environmental Quality and RBS confirming the parish had sounded the sirens.

The staff successfully re-demonstrated the siren activation (simulated) and the drill

was terminated at 1125.

d. PLAN ISSUES: 3.a.1, 3.b.1.

ISSUE NO.: 53-10-3a1-P-01

CRITERION: OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers IAW plans and procedures. Emergency workers periodically and at the end of each mission read and record dosimeter reading. (NUREG-0654, K.3)

CONDITION: Emergency workers were issued direct reading dosimeters that would not allow the individual to read the administrative reporting limits (at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent (TEDE)). The lowest range dosimeter provided was a 0 to 5 R. It is not possible to accurately read a 0 to 5 R dosimeter so that measurements of less than 100 mR can be reliably determined.

POSSIBLE CAUSE: The Louisiana Department of Environmental Quality (LDEQ) Field Monitoring Teams (FMT) report their monitoring results to the Field Team Coordinator and the Dose Assessment Coordinator at the Emergency Operations Facility calculate revised return (turnback) values based on the updated FMT data. These calculations resulted in a new dose conversion factor that revised the return value to account for TEDE to 72 mR. Emergency workers were not issued appropriate DRDs that measure exposure levels that low.

REFERENCE: NUREG K.3.a, b

EFFECT: Emergency workers would not have been able to monitor their exposure to ensure that turnback values were not exceeded.

RECOMMENDATION: Acquire and issue dosimetry that can be correctly read for lower exposure levels to ensure administrative control levels can be accurately measured.

ISSUE NO.: 53-10-3b1-P-02

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the admin of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: The RADEF Officer issued potassium iodide (KI) to an Emergency Worker but there is no method to track the date and the time to record when the Emergency Worker ingests the KI once the recommendation to ingest the KI is received.

POSSIBLE CAUSE: There is no formal log for recording the date and time that an emergency worker ingests KI once the recommendation is received.

REFERENCE: NUREG-0654, E.7., J.10.e, f.; Interim REP Program Manual

EFFECT: The RADEF Officer would only be able to identify who received KI and would not have an official record of who ingested KI and when. For dose reconstruction purposes, it is necessary to document the date and time KI is ingested.

CORRECTIVE ACTION DEMONSTRATED: East Baton Rouge Parish Emergency Response Procedure for RADEF Officer - Rev. 21 contains Attachment 7. Attachment 7 is the Record of Potassium Iodide (KI) Distribution and Ingestion form that provides a method of tracking individual ingestion for a period of 10 days for Emergency Workers. The form also provides a method of tracking whether or not KI was ingested each day and who authorized the ingestion of KI.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.2 Port Hudson Career Academy

- a. MET: 3.a.1, 3.c.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.3 East Feliciana Parish Emergency Operations Center and Traffic/Access Control Point

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 2.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 3.f.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: 5.a.1.

ISSUE NO.: 53-10-5a1-D-05

CRITERION: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite officials to notify the public of an emergency situation. (10 CFR Part 50, Appendix E & NUREG-0654, E.1.,4.,5.,6.,7.)

CONDITION: Sirens were not activated (simulated) by the parishes as required at 1111 and 1208. The EAS messages, Scenario #8 and #22, were broadcasted as scheduled by the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) at 1114 and 1211. Three of the five parishes simulated siren activation at the agreed upon time of 1111 prior to transmittal of the first EAS message, two parishes (Pointe Coupee and East Baton Rouge Parishes) believed that the siren activation was being completed at an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility). When the Protective Action Decision was revised later in the exercise, arrangements were made again to activate the sirens for alerting at 1208 to precede the transmission of the EAS message at GOHSEP that was scheduled for 1211. For this siren activation, three parishes (Pointe Coupee, East Baton Rouge, and East Feliciana Parishes) believed the sirens were being activated in an alternate

location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility).

POSSIBLE CAUSE: Sirens were not activated (simulated) by the parishes as required at 1111 and 1208. The EAS messages, Scenario #8 and #22, were broadcasted as scheduled by the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) at 1114 and 1211. Three of the five parishes simulated siren activation at the agreed upon time of 1111 prior to transmittal of the first EAS message, two parishes (Pointe Coupee and East Baton Rouge Parishes) believed that the siren activation was being completed at an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility). When the Protective Action Decision was revised later in the exercise, arrangements were made again to activate the sirens for alerting at 1208 to precede the transmission of the EAS message at GOHSEP that was scheduled for 1211. For this siren activation, three parishes (Pointe Coupee, East Baton Rouge, and East Feliciana Parishes) believed the sirens were being activated in an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility).

REFERENCE: NUREG-0654/FEMA-REP-1, E.6; and LPRRP, Attachment III, Enclosures 1-5.

EFFECT: Sirens were not activated (simulated) at the designated times by the all of the parishes as required to alert the public to the broadcast of the EAS messages. This incomplete EAS process could result in members of the public being unaware of the protective actions that were being implemented and may result in a negative impact on public health and safety.

It should be noted that the licensee (by procedure) monitors siren activation by the parishes to confirm siren activation at the scheduled time. The licensee maintains the ability to sound sirens in the event of a failure at the parish and they would activate the sirens if requested by the parish. The licensee would contact the parish if the siren activation was not completed as required. Because the sirens were not actually activated (for exercise purposes) this back-up process was not implemented and could not be verified by the evaluators.

CORRECTIVE ACTION DEMONSTRATED: The East Feliciana Parish Emergency Operations Center (EOC) is located at 11050 Bank Street, Clinton, Louisiana. On July 14, 2010 the Director of the East Feliciana Parish Office of Homeland Security and Emergency Preparedness (EFPOHSEP) and his Communication Manager participated in the drill for the re-demonstration of sirens. This drill was conducted to address a previously identified Deficiency from the River Bend Station (RBS) Plume and Ingestion Pathway Exercise. Re-demonstration of sounding of the sirens was successfully demonstrated.

At 1101, the EFPOHSEP received notification of a General Emergency (GE) had been declared at RBS via the dedicated facsimile (fax) printer. Message #1 also contained a Protective Action Recommendation (PAR) for Scenario #1. The Communications Manager notified the Director and began a log of events on the computer.

At 1102, announcement was made on the 800 MHz radio system to “stand by” for a PAR call. Shortly after the announcement a Roll Call was made for the participating locations. At 1103 the Director confirmed receipt of the fax over the radio.

At 1105, a PAR Call was conducted. PAR Scenario #1 was recommended by RBS. At 1107 the Director of EFPOHSEP verbally concurred with PAR Scenario #1 over the radio. At 1110 all participating locations had concurrence to implement PAR Scenario #1 and that sounding of the sirens would take place at 1115. The Governor’s Office of Homeland Security and Emergency Preparedness (GOHSEP) stated that the Emergency Alert System (EAS) message would be broadcast following the sounding of the sirens.

At 1115, the EFPOHSEP Communications Manager, under the direction of the EFPOHSEP Director, demonstrated the simulation of sounding the sirens. The demonstration consisted of showing where the key would be inserted, waiting for the indicator lights, and then pressing of the button to activate the sirens. No sirens were sounded for this drill.

At 1120, an announcement was made on the radio system by RBS that all sirens had

completed sounding at 1118 and at 1120 GOHSEP had completed the transmission of the EAS message which would be repeated periodically.

At 1124, Message #2 was received terminating the drill. Copies of all log sheets and messages were retained for documentation.

d. PLAN ISSUES: 3.b.1.

ISSUE NO.: 53-10-3b1-P-04

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the admin of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: The RADEF Officer issued potassium iodide (KI) to an Emergency Worker but there is no method to track the date and the time to record when the Emergency Worker ingests the KI once the recommendation to ingest the KI is received.

POSSIBLE CAUSE: There is no formal log for recording the date and time that an emergency worker ingests KI once the recommendation is received.

REFERENCE: NUREG-0654, E.7., J.10.e, f.; Interim REP Program Manual

EFFECT: The RADEF Officer would only be able to identify who received KI and would not have an official record of who ingested KI and when. For dose reconstruction purposes, it is necessary to document the date and time KI is ingested.

CORRECTIVE ACTION DEMONSTRATED: East Feliciana Parish Emergency Response Procedure for RADEF Officer - Rev. 22 contains Attachment 7. Attachment 7 is the Record of Potassium Iodide (KI) Distribution and Ingestion form that provides a method of tracking individual ingestion for a period of 10 days for Emergency Workers. The form also provides a method of tracking whether or not KI was ingested each day and who authorized the ingestion of KI.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.4 Pointe Coupee Parish Emergency Operations Center and Traffic/Access Control Point

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 2.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 3.f.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: 5.a.1.

ISSUE NO.: 53-10-5a1-D-07

CRITERION: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite officials to notify the public of an emergency situation. (10 CFR Part 50, Appendix E & NUREG-0654, E.1.,4.,5.,6.,7.)

CONDITION: Sirens were not activated (simulated) by the parishes as required at 1111 and 1208. The EAS messages, Scenario #8 and #22, were broadcasted as scheduled by the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) at 1114 and 1211. Three of the five parishes simulated siren activation at the agreed upon time of 1111 prior to transmittal of the first EAS message, two parishes (Pointe Coupee and East Baton Rouge Parishes) believed that the siren activation was being completed at an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility). When the Protective Action Decision was revised later in the exercise, arrangements were made again to activate the sirens for alerting at 1208 to precede the transmission of the EAS message at GOHSEP that was scheduled for 1211. For this siren activation, three parishes (Pointe Coupee, East Baton Rouge, and East Feliciana Parishes) believed the sirens were being activated in an alternate location (by either GOHSEP where there is no panel for siren activation or at the River Bend Station Emergency Operations Facility).

POSSIBLE CAUSE: There is the possibility that the parishes may have been

confused during the coordination call. The call also included discussion of the exception area alerting that was being conducted by helicopter (for the FEMA approved exception areas) and the approval for that alerting by West Feliciana Parish.

REFERENCE: NUREG-0654/FEMA-REP-1, E.6; and LPRRP, Attachment III, Enclosures 1-5.

EFFECT: Sirens were not activated (simulated) at the designated times by the all of the parishes as required to alert the public to the broadcast of the EAS messages. This incomplete EAS process could result in members of the public being unaware of the protective actions that were being implemented and may result in a negative impact on public health and safety.

It should be noted that the licensee (by procedure) monitors siren activation by the parishes to confirm siren activation at the scheduled time. The licensee maintains the ability to sound sirens in the event of a failure at the parish and they would activate the sirens if requested by the parish. The licensee would contact the parish if the siren activation was not completed as required. Because the sirens were not actually activated (for exercise purposes) this back-up process was not implemented and could not be verified by the evaluators.

CORRECTIVE ACTION DEMONSTRATED: Pointe Coupee Parish (PCP) Emergency Operations Center (EOC) successfully re-demonstrated the activation of the siren system on July 14, 2010. The PCP EOC is located at 7011 Mitchell Lane, Morganza, LA 70759. The PCP Emergency Management Director (EMD) was responsible for making Protective Action Decisions (PADs) for the PCP population.

The River Bend Station (RBS) Siren Control Box is located in the Office of Emergency Preparedness (OEP) closet in the PCP EOC. The keys to activate the siren system are secured in a storage locker in the PCP EOC equipment room. Siren activation procedures were kept along with other emergency procedures in binders located in the OEP closet. Additional copies of procedures were available in the storage locker in the equipment room. The alert and notification system activation was demonstrated up to the point of activation, and siren activation was simulated

once during the drill.

At 1102, the PCP EOC received Message #1 with a Protective Action Recommendation (PAR) referencing Scenario #1 via fax from RBS. Message #1 stated a General Emergency had been declared at RBS. The RBS Communicator instructed each Parish EOC to turn their radios to the PAR CALL channel. A roll call was then performed by RBS with each Parish to confirm receipt of Message #1. The RBS Communicator then instructed each Parish EMD to standby for PAR concurrence. At 1108, the RBS recovery Manager requested each Parish EMD respond with their PAD to implement PAR Scenario #1. Each Parish EMD concurred. At 1110, the RBS Recovery Manager recommended that the sirens sound at 1115.

At 1115, the PCP Disptacher/Communicator demonstrated the steps necessary to activate and sound the sirens (simulated) in PCP. At 1117, the PCP EMD called RBS to verify that the sirens sounded. PCP EOC received a drill termination call from RBS at 1126.

d. PLAN ISSUES: 3.b.1.

ISSUE NO.: 53-10-3b1-P-06

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the admin of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: The RADEF Officer issued potassium iodide (KI) to an Emergency Worker but there is no method to track the date and the time to record when the Emergency Worker ingests the KI once the recommendation to ingest the KI is received.

POSSIBLE CAUSE: There is no formal log for recording the date and time that an emergency worker ingests KI once the recommendation is received.

REFERENCE: NUREG-0654, E.7., J.10.e, f.; Interim REP Program Manual

EFFECT: The RADEF Officer would only be able to identify who received KI and would not have an official record of who ingested KI and when. For dose reconstruction purposes, it is necessary to document the date and time KI is ingested.

CORRECTIVE ACTION DEMONSTRATED: Point Coupe Parish Emergency Response Procedure for RADEF Officer - Rev. 19 contains Attachment 7. Attachment 7 is the Record of Potassium Iodide (KI) Distribution and Ingestion form that provides a method of tracking individual ingestion for a period of 10 days for Emergency Workers. The form also provides a method of tracking whether or not KI was ingested each day and who authorized the ingestion of KI.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.5 West Baton Rouge Parish Emergency Operations Center and Traffic/Access

Control Point

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 2.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 3.f.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: 3.b.1.

ISSUE NO.: 53-10-3b1-P-08

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the admin of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: The RADEF Officer issued potassium iodide (KI) to an Emergency Worker but there is no method to track the date and the time to record when the Emergency Worker ingests the KI once the recommendation to ingest the KI is

received.

POSSIBLE CAUSE: There is no formal log for recording the date and time that an emergency worker ingests KI once the recommendation is received.

REFERENCE: NUREG-0654, E.7., J.10.e, f.; Interim REP Program Manual

EFFECT: The RADEF Officer would only be able to identify who received KI and would not have an official record of who ingested KI and when. For dose reconstruction purposes, it is necessary to document the date and time KI is ingested.

CORRECTIVE ACTION DEMONSTRATED: West Baton Rouge Parish Emergency Response Procedure for RADEF Officer - Rev. 21 contains Attachment 7. Attachment 7 is the Record of Potassium Iodide (KI) Distribution and Ingestion form that provides a method of tracking individual ingestion for a period of 10 days for Emergency Workers. The form also provides a method of tracking whether or not KI was ingested each day and who authorized the ingestion of KI.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.6 West Baton Rouge Parish Monitoring and Decontamination Center

- a. MET: 1.e.1, 3.a.1, 6.a.1, 6.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.7 West Feliciana Parish Emergency Operations Center and Traffic/Access Control Point

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 2.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 3.f.1, 5.a.1, 5.a.3, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: 3.b.1.

ISSUE NO.: 53-10-3b1-P-09

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the admin of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: The RADEF Officer issued potassium iodide (KI) to an Emergency Worker but there is no method to track the date and the time to record when the Emergency Worker ingests the KI once the recommendation to ingest the KI is received.

POSSIBLE CAUSE: There is no formal log for recording the date and time that an emergency worker ingests KI once the recommendation is received.

REFERENCE: NUREG-0654, E.7., J.10.e, f.; Interim REP Program Manual

EFFECT: The RADEF Officer would only be able to identify who received KI and would not have an official record of who ingested KI and when. For dose reconstruction purposes, it is necessary to document the date and time KI is ingested.

CORRECTIVE ACTION DEMONSTRATED: West Feliciana Parish Emergency Response Procedure for RADEF Officer - Rev. 19 contains Attachment 7. Attachment 7 is the Record of Potassium Iodide (KI) Distribution and Ingestion form that provides a method of tracking individual ingestion for a period of 10 days for Emergency Workers. The form also provides a method of tracking whether or not KI was ingested each day and who authorized the ingestion of KI.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3 Private Organizations

3.3.3.1 EAS Radio Station WJBO

- a. MET: 5.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

SECTION 4: CONCLUSION

APPENDIX A: IMPROVEMENT PLAN

Issue Number: 53-10-3a1-P-01		Criterion: 3a1	
ISSUE: Emergency workers were issued direct reading dosimeters that would not allow the individual to read the administrative reporting limits (at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent (TEDE)). The lowest range dosimeter provided was a 0 to 5 R. It is not possible to accurately read a 0 to 5 R dosimeter so that measurements of less than 100 mR can be reliably determined.			
RECOMMENDATION: Acquire and issue dosimetry that can be correctly read for lower exposure levels to ensure administrative control levels can be accurately measured.			
CORRECTIVE ACTION DESCRIPTION:			
CAPABILITY:		PRIMARY RESPONSIBLE AGENCY:	
CAPABILITY ELEMENT:		START DATE:	
AGENCY POC:		ESTIMATED COMPLETION DATE:	

APPENDIX B: EXERCISE TIMELINE

Appendix A, on the following page, presents the time at which key events and activities occurred during the River Bend Station (RBS) exercise on June 8, 2010.

Table 1 - Exercise Timeline
DATE: 2010-06-08, SITE: River Bend Station, LA

Emergency Classification Level or Event	Time Utility Declared	GOHSEP EOC	LDEQ HQ	LDEQ EOF	RB Alt. JIC	E. Baton Rouge Parish	E. Feliciana Parish
Unusual Event	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Alert	0755	0810	0808			0808	0812
Site Area Emergency	0917	0929	0929	0929	0929	0929	0929
General Emergency	1036	1046		1037	1101	1046	1046
Simulated Rad. Release Started	1036	1046		1046	1101	1046	1046
Simulated Rad. Release Terminated	1332	1332		1246	1344	1335	1404
Facility Declared Operational		04/21/2010		1027	0900	0911	0849
Declaration of State of Emergency		0930					
1st Protective Action Decision: Scenario #8				1036		1055	1050
1st Siren Activation		1111		1111			1111
1st EAS or EBS Message		1114				1114	1114
2nd Protective Action Decision: Scenario #22				1135		1145	1144
2nd Siren Activation		1208		1208			
2nd EAS or EBS Message		1244				1211	1213
KI Administration Decision:		1220		1140		1222	1223
Exercise Terminated		1408		1402	1428	1402	1404

Table 1 - Exercise Timeline
DATE: 2010-06-08, SITE: River Bend Station, LA

Emergency Classification Level or Event	Time Utility Declared	Pointe Coupee Parish	W. Baton Rouge Parish	W. Feliciana Parish
Unusual Event	N/A	N/A	N/A	N/A
Alert	0755	0806	0808	0808
Site Area Emergency	0917	0929	0929	0929
General Emergency	1036	1045	1046	1046
Simulated Rad. Release Started	1036	1045	1234	1046
Simulated Rad. Release Terminated	1332	1335		
Facility Declared Operational		0900	0904	0837
Declaration of State of Emergency				
1st Protective Action Decision: Scenario #8		1055	1052	1058
1st Siren Activation			1111	1111
1st EAS or EBS Message		1114	1114	1114
2nd Protective Action Decision: Scenario #22		1155		1150
2nd Siren Activation			1208	1208
2nd EAS or EBS Message		1211	1211	1211
KI Administration Decision:		1220	1231	1223
Exercise Terminated		1406	1402	1402

APPENDIX C: EXERCISE EVALUATORS AND TEAM LEADERS

DATE: 2010-06-08, SITE: River Bend Station, LA

LOCATION	EVALUATOR	AGENCY
Governor's Office of Homeland Security and Emergency Preparedness	Nan Calhoun *Elsa Lopez	DHS/FEMA DHS/FEMA
Louisiana Department of Environmental Quality Headquarters	Todd Davidson	ICF
Louisiana Department of Environmental Quality EOF	Joseph Keller *Tim Pflieger	ICF DHS/FEMA
Louisiana Department of Environmental Quality Field Monitoring Team One	John Zeidler	ICF
Louisiana Department of Environmental Quality Field Monitoring Team Two	*Marcy Campbell	ICF
River Bend Alternate Joint Information Center	*Bill Bischof Robert Duggleby DeeEll Fifield	DHS/FEMA ICF ICF
East Baton Rouge Parish Emergency Operations Center and Traffic/Access Control Point	*Ernie Boaze Daniel Prevo Richard Smith	ICF ICF ICF
Port Hudson Career Academy	Richard Smith	ICF
East Feliciana Parish Emergency Operations Center and Traffic/Access Control Point	*Gary Bolender Mark Dalton Carl Wentzell	ICF ICF ICF
Pointe Coupee Parish Emergency Operations Center and Traffic/Access Control Point	Michael Burriss *Al Lookabaugh David Petta	ICF ICF ICF
West Baton Rouge Parish Emergency Operations Center and Traffic/Access Control Point	*Linda Gee Michael Petullo Lynn Steffensen	DHS/FEMA ICF ICF
West Baton Rouge Parish Monitoring and Decontamination Center	Nan Calhoun Brad DeKorte Elsa Lopez *Tim Pflieger	DHS/FEMA DHS/FEMA DHS/FEMA DHS/FEMA
West Feliciana Parish Emergency Operations Center and Traffic/Access Control Point	Brad DeKorte *James McCianahan William O'Brien	DHS/FEMA ICF ICF
EAS Radio Station WJBO	*Tim Pflieger	DHS/FEMA
* Team Leader		

APPENDIX D: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAC	Accident Assessment Coordinator
ALARA	As Low As Reasonably Achievable
ANS	Alert and Notification System
ARCA	Areas Requiring Corrective Action
CDC	Child Daycare Centers
CDE	Committed Dose Equivalent
CEDE	Committed Effective Dose Equivalent
CO	Communications Officer
CS	Company Spokesperson
DAC	Dose Assessment Coordinator
DEM	Director of Emergency Management
DHS/FEMA	Department of Homeland Security/Federal Emergency Management Agency
DIL	Derived Intervention Level
DOTD	Department of Transportation and Development
DPW	Department of Public Works
DRD	Direct Reading Dosimeter
DRL	Derived Response Level
EAS	Emergency Alert System
EBRP	East Baton Rouge Parish
EBRPSS	East Baton Rouge Parish School System
ECL	Emergency Classification Level
EFP	East Feliciana Parish
EFPOHSEP	East Feliciana Parish Office of Homeland Security and Emergency Preparedness
EFSD	East Feliciana Sheriff's Department
EMD	Emergency Management Director
EMS	Emergency Medical Services
EOC	Emergency Operation Center
EOF	Emergency Operations Facility
EPA	Environmental Protection Agency
EPZ	Emergency Planning Zone
ERP	Emergency Response Procedure
ESO	Extension Service Officer
EW	Emergency Worker
FAA	Federal Aviation Administration

FD	Fire Department
FDA	Food and Drug Administration
FMT	Field Monitoring Teams
FRMAC	Federal Radiological Monitoring and Assessment Center
FSA	Farm Services Agency
FTC	Field Team Coordinator
GE	General Emergency
GM	Geiger- Muller
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
GPS	Global Positioning System
HOO	Headquarters Operations Officer
IC	Incident Commander
IPZ	Ingestion Planning Zone
IRT	Initial Response Team
JFD	Jackson Fire Department
JIC	Joint Information Center
JPD	Jackson Police Department
KI	Potassium Iodide
LCD	Liquid Crystal Display
LDEQ	Louisiana Department of Environmental Quality
LSU	Louisiana State University
MF	Medical Facilities
NMF	Notification Message Form
NRC	Nuclear Regulatory Commission
OHSEP	Office of Homeland Security and Emergency Preparedness
ORO	Offsite Response Organization
OSL	Optically Stimulated Luminescent
PA	Public Address
PAD	Protective Action Decision
PAG	Protective Action Guideline
PAR	Protective Action Recommendation
PAS	Protective Action Section
PCP	Pointe Coupee Parish
PCPOHSEP	Point Coupee Parish Office of Homeland Security and Emergency Preparedness
PKD	Personal Dosimetry Kit
PIO	Public Information Officer
PS	Parish Spokesperson
RAC	Regional Assistance Committee
RACES	Radio Amateur Civil Emergency Service
RBS	River Bend Station

REDAM	Radiological Emergency Dose Assessment Model
REP	Radiological Emergency Preparedness
REP&R	Radiological Emergency Planning and Response
RERP	Radiological Emergency Response Plan
RO	Radiological Officer
SAE	Site Area Emergency
SAV	Staff Assistance Visit
SDO	Staff Duty Officer
SEL	Senior EOF Liaison
SEOC	State Emergency Operations Center
SMRAP	Southern Mutual Radiation Assistance Plan
SOP	Standard Operating Procedures
T/ACP	Traffic Access and Control Point
TC	Transportation Coordinator
TEDE	Total Effective Dose Equivalent
TLC	Technical Logistics Coordinator
UHF	Ultra High Frequency
VDC	Vehicle Dispatch Coordinator
VHF	Very High Frequency
WBR	West Baton Rouge
WBRP	West Baton Rouge Parish
WFP	West Feliciana Parish
WFPEOC	West Feliciana Parish Emergency Operations Center

APPENDIX E: EXERCISE PLAN

River Bend Station Extent of Play 2010

EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

Sub-element 1.a – Mobilization

Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654, A.4; D.3, 4; E.1, 2; H.4)

Locations

State EOC, Louisiana Department of Environmental Quality Headquarters (LDEQ HQ), LDEQ Emergency Operations Facility (LDEQ EOF), Alternate Joint Information Center (Alternate JIC), East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Point Coupee Parish EOC

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform a walk-through, observe and evaluate the real life response mobilization.

The JIC emergency response team will be pre-positioned near the Alternate JIC located in Baton Rouge. The team will mobilize and activate the facility at the Alert emergency classification level (ECL).

ARCA None

EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

Sub-element 1.b - Facilities

Criterion 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654, H.3)

Locations

West Baton Rouge Parish EOC

Extent of Play

ARCA None

EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

Sub-element 1.c – Direction and Control

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible. (NUREG-0654, A.1.d; A.2.a,b)

Locations

State EOC, LDEQ HQ, LDEQ EOF, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

FEMA will perform a walk-through and observe direction and control as demonstrated during the current real life response.

ARCA None

EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

Sub-element 1.d – Communication Equipment

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communication capabilities are managed in support of emergency operations. (NUREG-0654, F.1, 2)

Locations

State EOC, LDEQ HQ, LDEQ EOF, Louisiana Department of Environmental Quality Field Monitoring Team 1 (LDEQ FMT 1), LDEQ FMT 2, Alternate JIC, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview and/or observe the use of the primary and back-up communications in use for the current real life response to evaluate the criterion.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

Sub-element 1.e – Equipment and Supplies to Support Operations

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654, H.7; J.10.a, b, e; J.11; K.3.a)

Locations

State EOC, LDEQ HQ, LDEQ EOF, LDEQ FMT 1, LDEQ FMT 2, Alternate JIC, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC, West Baton Rouge Parish Monitoring and Decontamination Center

Extent of Play

LDEQ FMTs will not don anti-contamination suits. The personal protective equipment is available in the field team kits, but will be demonstrated through discussion with the evaluator.

Dosimetry and KI are not applicable at the Alternate JIC.

Mobilization of the State EOC has occurred for an oil spill response. FEMA will interview and/or observe use of operational equipment and supplies in use for real life response to evaluate this criterion.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

OUT OF SEQUENCE DEMONSTRATION

- The West Baton Rouge Parish Monitoring and Decontamination Center will be demonstrated **out-of-sequence** on June 7, 2010 at 6:00pm.

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.a – Emergency Worker Exposure Control

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to insure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides. (NUREG-0654, K.4; J.10.e, f)

Locations

State EOC, LDEQ EOF, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview to evaluate the criterion. At a minimum, GOHSEP, LDEQ and DHH will discuss the process. **Note:** Criterion will be evaluated in-sequence with the exercise time line.

At other locations, if the scenario does not warrant a discussion on either the authorization to administer KI or emergency worker (EW) exposure exceeding administrative limits, then the criteria shall be accomplished through an interview with the evaluator.

Note: Parish decision-makers receive recommendations for KI and EW exposure from the State EOC.

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.b. - 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 on-site and off-site environmental conditions. (NUREG-0654, I.8, 10 and Supplement 3)

Locations

State EOC, LDEQ EOF

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview to evaluate the criterion. At a minimum, LDEQ and GOHSEP will be required to discuss the process. **Note:** Criterion will be evaluated in-sequence with the exercise time line.

The LDEQ EOF controller will inject simulated field monitoring data to the Dose Assessment Coordinator for the purpose of dose projection validation and verification through back calculations.

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.b. - Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency

Criterion 2.b.2: A decision making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PAD) for the general public (including the recommendation for the use of KI, if ORO policy). (NUREG-0654, J.9; J.10.f, m)

Locations

State EOC, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview to evaluate the criterion. At a minimum, GOHSEP, LDEQ and DHH will discuss the process. **Note:** Criterion will be evaluated in-sequence with the exercise time line.

According to the State of Louisiana's policy, KI is not considered for the general public.

If the scenario does not warrant a discussion on protective action decisions for the protection of special populations, then the criteria shall be accomplished through an interview with the evaluator.

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.c - Protective Action Decisions Consideration for the Protection of Special Populations

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups. (NUREG-0654, J.9; J.10.d, e)

Locations

East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

If the scenario does not warrant a discussion on protective action decisions for the protection of special populations, then the criteria shall be accomplished through an interview with the evaluator.

West Baton Rouge Parish does not have any special populations. A letter verifying the lack of special populations within West Baton Rouge Parish's portion of the 10-mile EPZ will be available for review. The criteria shall be accomplished through an interview with the evaluator.

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.d – Radiological Assessment and Decision-Making for the Ingestion Exposure Pathway

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria. (NUREG-0654, J.9, J.11)

Locations

LDEQ EOF

Extent of Play

Criterion will be demonstrated on June 9, 2010, the “2nd day” of the exercise. ORO’s will not consider any plume or deposition outside the 50-mile EPZ.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC’s are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.e – Radiological Assessment and Decision-Making Concerning Relocation, Reentry, and Return

Criterion 2.e.1: Timely relocation, reentry, and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the ORO’s plan and/or procedures. (NUREG-0654, L.10; J.9; M.1)

Locations

LDEQ EOF, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Criterion will be demonstrated on June 9, 2010, the “2nd day” of the exercise. ORO’s will not consider any plume or deposition outside the 50-mile EPZ.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC’s are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.a – Implementation of Emergency Worker Exposure Control

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart. (NUREG-0654, K.3.a, b)

Locations

LDEQ EOF, LDEQ FMT 1, LDEQ FMT 2, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC, Port Hudson Career Academy, West Baton Rouge Parish Monitoring & Decontamination Center

Extent of Play

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

OUT OF SEQUENCE DEMONSTRATION

- The West Baton Rouge Parish Monitoring and Decontamination Center will be demonstrated **out-of-sequence** on June 7, 2010 at 6:00pm.

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.b. – Implementation of KI Decision

Criterion 3.b.1 – KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record-keeping of the administration of KI for emergency workers and institutionalized individuals is maintained. (NUREG-0654, J.10.e)

Locations

LDEQ EOF, LDEQ FMT 1, LDEQ FMT 2, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Note: There are no institutionalized individuals within the 10-mile EPZ affected areas of East Baton Rouge Parish or West Baton Rouge Parish. Decision-making and discussion will focus on emergency workers.

The capability to make KI available to emergency workers as well as the capability to accomplish distribution of KI consistent with decisions made will be demonstrated; however, actual distribution of KI will not be demonstrated. Emergency workers will be able to discuss with the evaluator their procedure on the use of KI and appropriate record-keeping process.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.c. – Implementation of Protective Actions for Special Populations

Criterion 3.c.1: Protective action decisions are implemented for special populations other than schools within areas subject to protective actions. (NUREG-0654, J.10.c, d, g)

Locations

East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

The EOCs will demonstrate the capability to alert and notify special population facilities, special populations and individuals according to plans and procedures, as applicable, and it will be accomplished through a discussion. Contact with a special facility will be simulated.

West Baton Rouge Parish does not have any special populations. A letter verifying the lack of special populations within West Baton Rouge Parish's portion of the 10-mile EPZ will be available for review. The criteria shall be accomplished through an interview with the evaluator.

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.c. – Implementation of Protective Actions for Special Populations

**Criterion 3.c.2 – OROs/School officials implement protective actions for schools.
(NUREG-0654, J.10.c, d, g)**

Locations

Port Hudson Career Academy

Extent of Play

A school official from the academy will report to the EOC and demonstrate the implementation of protective actions for the school population by describing to the evaluator the procedures that would be followed. The school official will discuss with evaluator the capability to alert and notify the school according to plans and procedures, as applicable.

Using the method specified in procedures, one transportation provider for the school will be contacted. The transportation provider will report to the EOC. Implementation of transportation for schools will be demonstrated through a discussion. The transportation provider will not drive the route to the reception center. The discussions with the school official and the transportation provider will occur outside of the EOC operations area after they report to the EOC.

The discussions will occur at a time, as determined by the evaluator, when EOC activities do not require observation.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.d. – Implementation of Traffic and Access Control

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel. (NUREG-0654, J.10.g, j)

Locations

East Baton Rouge Parish EOC, East Feliciana Parish EOC, Pointe Coupee Parish EOC, West Baton Rouge Parish EOC, West Feliciana Parish EOC

Extent of Play

This may be demonstrated out of sequence. One traffic and access control staff will demonstrate knowledge of their roles and responsibility by discussion with the evaluator. The discussion will be at or near the EOC. Travel to the traffic and access control point will not be demonstrated. If the scenario does not warrant this discussion at a location, the controller will inject data to stimulate a discussion.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.d. – Implementation of Traffic and Access Control

Criterion 3.d.2: Impediments to evacuation are identified and resolved. (NUREG-0654, J.10.k)

Locations

East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Impediments will be provided by controller inject. Evaluation will be by discussion to identify and take appropriate actions to deal with impediments and may be conducted out-of-sequence.

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.e. – Implementation of Ingestion Pathway Decisions

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food, supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions. (NUREG-0654, J.9, 11)

Locations

LDEQ EOF

Extent of Play

Criterion will be demonstrated on June 9, 2010, the “2nd day” of the exercise.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC’s are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.e. – Implementation of Ingestion Pathway Decisions

Criterion 3.e.2: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production. (NUREG-0654, J.9, 11)

Locations


LDEQ EOF

Extent of Play

Criterion will be demonstrated on June 9, 2010, the “2nd day” of the exercise.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC’s are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.f. – Implementation of Relocation, Reentry, and Return Decisions

Criterion 3.f.1: Decisions regarding controlled reentry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented. (NUREG-0654, M.1, 3)

Locations

East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Criterion will be demonstrated on June 9, 2010, the “2nd day” of the exercise.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC’s are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSES

Sub-element 4.a – Plume Phase Field Measurement and Analyses

Criterion 4.a.1: The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates. (NUREG-0654, H.10; I.7, 8, 9)

Locations

LDEQ FMT 1, LDEQ FMT 2

Extent of Play

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSES

Sub-element 4.a – Plume Phase Field Measurement and Analyses

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654, H.12; I.8, 11; J.10.a)

Locations

LDEQ EOF

Extent of Play

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSES

Sub-element 4.a – Plume Phase Field Measurement and Analyses

Criterion 4.a.3: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media. (NUREG-0654, I.9)

Locations

LDEQ FMT 1, LDEQ FMT 2

Extent of Play

Charcoal cartridges will be used for air sampling during this exercise. **Note:** Silver zeolite cartridges are available in the field team kits.

One Field Monitoring Team member will demonstrate donning and doffing an anti-contamination suit. Other than this demonstration, LDEQ FMT members will not don anti-contamination suits.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSES

Sub-element 4.b – Post Plume Phase Field Measurements and Sampling

Criterion 4.b.1: The field teams demonstrate the capability to make appropriate measurements and to collect appropriate samples (e.g. food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making. (NUREG-0654, I.8, J.11)

Locations

LDEQ FMT 1, LDEQ FMT 2

Extent of Play

LDEQ FMT 1 will collect milk samples from the LSU AgCenter Dairy.

LDEQ FMT 2 will collect soil, water, and vegetation samples at Capitol Lakes.

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted. Correction-on-the-spot at Parish EOC's are limited to areas outside the EOC operations area (i.e., emergency worker briefings and issue of dosimetry in other rooms).

ARCA None

EVALUATION AREA 5: EMERGENCY NOTIFICATION & PUBLIC INFORMATION

Sub-element 5.a – Activation of the Prompt Alert and Notification System

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance. (10 CFR Part 50, Appendix E.IV.D & NUREG-0654, E.5, 6, 7)

Locations

State EOC, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC, WJBO

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview and/or observe the EAS process to evaluate this criterion. The dissemination of the EAS message to the public will be demonstrated through discussion. Note: Criterion will be evaluated in-sequence with the exercise time line.

The alert and notification system, activation procedure will be demonstrated up to the point of activation. The siren activation will be simulated.

OUT OF SEQUENCE SITE ASSISTED VISIT

- A site assisted visit will be performed at the WJBO radio station on June 7, 2010 at 3:00pm.

ARCA None

EVALUATION AREA 5: EMERGENCY NOTIFICATION & PUBLIC INFORMATION

Sub-element 5.a – Activation of the Prompt Alert and Notification System

Criterion 5.a.3: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system. (NUREG-0654, E.6, Appendix 3.B.2.c)

Locations

West Feliciana Parish EOC

Extent of Play

The West Feliciana Parish Sheriff's Office helicopter and pilot will pre-stage at the helipad located at the Sheriff's Annex on Highway 61.

The pilot will launch when notified of the declaration of a General Emergency and fly the most difficult route which is located in PAS 5 within West Feliciana Parish. The helicopter will complete the flyover of the West Feliciana/Cat Island exception area within approximately 45 minutes of the decision to notify the public of the emergency. The broadcast of the message will be simulated.

The EOC will demonstrate the availability of a second person to accompany the pilot to make the pre-scripted announcement; however the Entergy Controller will simulate this emergency worker in flight to accommodate aircraft loading and will read the message to the FEMA evaluator.

The Public Address system will be demonstrated after the flyover at the False River Air Park. The helicopter will land at the Air Park for the evaluator and controller to disembark. The evaluator and controller will be located near the launch pad to receive a simulated broadcast made from the helicopter in flight. The helicopter will launch and make an in-flight announcement test message similar to "This is a test." The evaluator and/or controller on the ground will signal when the broadcast is heard. When the demonstration is completed, the helicopter will return the evaluator and controller to the original launch point.

If a law enforcement priority prevents the use of the helicopter or the pilot or the helicopter is not available, the demonstration will be rescheduled for out-of-sequence at a later date.

ARCA None

EVALUATION AREA 5: EMERGENCY NOTIFICATION & PUBLIC INFORMATION

Sub-element 5.b – Emergency Information and Instructions for the Public and the Media

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner. (NUREG-0654, E.5, 7; G.3.a, G.4.c)

Locations

State EOC, Alternate JIC, East Baton Rouge Parish EOC, West Baton Rouge Parish EOC, East Feliciana Parish EOC, West Feliciana Parish EOC, Pointe Coupee Parish EOC

Extent of Play

Mobilization of the State EOC has occurred for an oil spill response. FEMA will perform an interview to evaluate the criterion. A GOHSEP representative will be at the Alternate JIC for media activities.

Utility, State and Parish representatives will demonstrate the ability to provide emergency information and instructions to the public consistent with the scenario.

News media will not be present. Selected personnel will simulate the role of reporters asking questions during briefings.

Controllers will inject public phone team messages, media phone team messages and news briefing messages.

ARCA None

EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

Sub-element 6.a – Monitoring and Decontamination of Evacuees and Emergency Workers, and Registration of Evacuees

Criterion 6.a.1: The reception center/emergency worker facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees and/or emergency workers. (NUREG-0654, J.10.h; J.12; K.5.a)

Locations

West Baton Rouge Parish Monitoring and Decontamination Center

Extent of Play

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted.

OUT OF SEQUENCE DEMONSTRATION

- The West Baton Rouge Parish Monitoring and Decontamination Center will be demonstrated **out-of-sequence** on June 7, 2010 at 6:00pm.
- Two emergency workers will be monitored for contamination. A controller will inject data for a simulated contamination level for one emergency worker.
- Decontamination will be evaluated by demonstration and further discussion.
- Participants may be pre-staged near the monitoring & decontamination center.

ARCA None

EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

Sub-element 6.b – Monitoring and Decontamination of Evacuees and Emergency Worker Equipment

Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of emergency worker equipment including vehicles. (NUREG-0654, K.5.b)

Locations

West Baton Rouge Parish Monitoring and Decontamination Center

Extent of Play

Correction-on-the-spot will be considered at these locations at the discretion of and concurrence between the evaluator and the controller. Caution should be exercised to insure that exercise play is not interrupted.

OUT OF SEQUENCE DEMONSTRATION

- The West Baton Rouge Parish Monitoring and Decontamination Center will be demonstrated **out-of-sequence** on June 7, 2010 at 6:00pm.
- One emergency worker vehicle will be monitored for contamination. A controller will interject data for a simulated contamination level for one vehicle. Decontamination will be evaluated by discussion.
- Participants may be pre-staged near the monitoring & decontamination center.

ARCA None

GENERAL EXTENT-OF-PLAY (EOP):

1. With regard to last minute additions or changes to any previously approved Extent-of-Play, all suggested changes must be forwarded to the RAC Chair for approval.
2. The goal of all offsite response organizations (ORO) is to protect the health and safety of the public. This goal is achieved through the execution of appropriate plans and procedures. It is recognized that situations may arise that could limit the organizations in the exact execution of these plans and procedures.
3. In the event of an unanticipated situation, OROs are permitted to exercise flexibility in the implementation of their plans and procedures in order to successfully achieve the objective of protection of public health and safety and protection of the environment.

4. As a statement of fact, no ORO will deliberately deviate from its plans and procedures with the intent of avoiding responsibility.

References

As indicated in the Extent-of-Play Agreement, the State of Louisiana requests the option to correct issues immediately as defined in FEMA Policy Paper, Strategic Review Steering Committee, Initiative 1.5, correct Issues Immediately, effective March 31, 2000, signed by Kay C. Goss, CEM, Associate Director for Preparedness, Training and Exercises. Acceptable locations/activities for on the spot correction are clearly indicated in the extent of play portion under each criterion.

Plume Phase Scenario Narrative

I. Offsite Objectives

The objectives for offsite activities for the Plume Phase portion are listed in the previous section "Offsite Objectives."

II. Summary of Events

A. Objective

The scenario has been prepared to test the effectiveness of the emergency response organization (ERO) and functions of the RBS Emergency Plan, implementing procedures, facilities, and equipment. Some events that occur during this drill are unrealistic and may not be strictly in accordance with the design basis of the Facility.

To exercise the ERO, the goal of the scenario is to uncover the core and provide a path for a radiological release outside containment to the environment. To uncover the core to obtain clad damage, the ECCS systems and normal injection systems must be disabled. A path for radiological release to the environment is required to exercise the ERO fully.

B. Narrative of Events

The scenario starts at 0730 in a Division II work week. Workers staging to work (voltage readings) on ENS-SWG1B inadvertently cause ENS-ACB26 to open which de-energizes the bus. The Div II diesel generator auto starts and re-energizes ENS-SWG1B. A malfunction of the voltage regulator causes a bus fault and resulting fire in ENS-SWG1B. The fire brigade responds and extinguishes the fire with the assistance from offsite firefighting support. The damage to the switchgear is extensive and it will not be restored for the duration of the scenario. All Division II components are lost. At approximately 0744 to 0759, an Alert is declared on HA4-1, fire in structure or system required for safe shutdown and plant personnel report visible damage. Offsite notifications will be made and the ERO will be augmented using the paging system.

At approximately 0850, the condensate pumps trip offline; one due to an electrical short, the other due to a sheared shaft when the first pump trips. This results in a loss of RPV injection with condensate and feedwater. The reactor will scram and the associated initiations and isolations occur. As level lowers, RCIC will be manually initiated or auto initiated. HPCS may also initiate.

At approximately 0902, a RCIC steam leak will occur in the main steam tunnel downstream of the outboard isolation valve. The isolation temperature will be reached, however, both the inboard (E51-MOVF063) and outboard (E51-MOVF064) isolation valves will fail to close. When the main steam tunnel temperature reaches 141°F, the EAL condition for the potential loss (RC3) of the RCS barrier is met. The failure of both RCIC isolation valves to close leaving a downstream pathway to the environment meets the condition for loss of the primary containment barrier (PC3).

The loss or potential loss of two barriers meets the condition for a Site Area Emergency FS1-1. The SAE will be declared between approximately 0902 and 0917. A protected area evacuation will be directed.

A reactor coolant leak in the drywell will occur on the RWCU bottom head drain resulting in a drywell high pressure 1.68 psid signal (RC1). Emergency depressurization will be required due to exceeding the max safe operating temperature in two areas identified in EOP-3. The high pressure core spray pump will trip shortly after starting and the LPCS and RHR A injection valves fail to open after RPV pressure is lowered. Level will continue to lower.

At approximately 1035, RPV level will lower to <-162". This is a potential loss (FC2) of the fuel clad and conditions for a General Emergency are met. The GE will be declared and minimum PAR recommended. A rise in main plant release rate will occur when the core is initially uncovered. As water level continues to fall, more fuel damage will occur resulting in a rise in the main plant exhaust release rate. During this time core state will change from clad damage to fuel melt.

Main plant exhaust rate will reach a level that will result in a PAR upgrade at approximately 1125. The TSC and OSC teams will begin recovering injection sources and raising RPV water level.

The RCIC leak will be secured around 1215 resulting in a decline in radiological release rate. Radiological release rates will fall to near background levels around 1300. At approximately 1400, the simulator will be placed in FREEZE and the players will begin a self-critique.

C. Initial Conditions

1. Plant Operations

Plant operating at 90% power. On-line 180 days.

- a. Div II work week.
- b. Div II D/G STP operability run scheduled for 1400.

Planned evolution: Tag out is ready to be hung on ENS-SWG1B for voltage readings.

- c. CRD pump B is out-of-service to replace the oil pump.
- d. Condensate pump B is tagged out for motor bearing replacement.
- e. Condensate pump B discharge MOV is tagged out.

2. Weather - 0800

- a. Wind direction: 052
- b. Wind speed: 8 mph
- c. Delta T: -1.0
- d. Stability Class: C
- e. Forecast
 - i. Mid-day to afternoon showers expected throughout southeast Louisiana.
 - ii. Temperature 80° F with an expected high of 92 degrees this afternoon.

D. Disclaimer

The times indicated in the timeline (Attachment B) are approximate. The time of scenario events may be affected by operator response in the simulator or by the timeliness of Emergency Response Facility activation and actions.

Ingestion Pathway Scenario Narrative

I. Objectives

The objectives for the Ingestion Pathway portion of the offsite activities are listed in the “Offsite Objectives.”

II. Summary of Events

A. Objective

The scenario has been prepared to test the effectiveness of the State of Louisiana and River Bend Station Parishes emergency operating procedures, recommendations, decisions and implementation in response to the post emergency phase of a radiological event at River Bend Station.

B. Summary

1. 10-mile/50-mile EPZ

- a. Parishes outside the 10-mile EPZ are not expected to participate in the tabletop.
- b. Parishes within the 50-mile EPZ will be considered during public message development, agricultural and relocation decisions when appropriate.

2. Advanced Party Meeting

- a. The ingestion phase begins with the Advanced Party Meeting on June 8, 2010.
- b. A completed APM checklist will be injected at the beginning of the tabletop on June 9, 2010.

3. Tabletop

- a. The Ingestion Pathway Exercise will be demonstrated in a tabletop format.
- b. All participants will be located at the LDEQ Headquarters, except for LDEQ Field Monitoring Teams who will be deployed to the field.

- c. There may be some participants who cannot locate at LDEQ HQ, but will be available by phone or email.
 - d. The Ingestion Pathway Exercise activities will begin with a summarization of the activities from the Plume Phase Exercise demonstrated the day before.
 - i. The summarization will be injected by the tabletop Facilitator.
 - ii. It will include the PAR and PAD activities along with a map to indicate evacuated sectors.
 - iii. Post-emergency conditions will be presented.
4. Timing
- a. A particular time jump will not be specified.
 - b. However, considerations of actual time required for: Federal response; SMRAP response; additional field teams; mobile lab deployments; quantity of samples; sample run times; FRMAC deployment, flyover, maps from both the flyover and sample results; ends up with time progressing through a week or longer.
5. Sampling Plan
- a. Development of a sampling plan will be conducted out-of-sequence, but concurrently with the other Ingestion Pathway activities.
 - b. The sampling plan development will be demonstrated after the briefing of the LDEQ Field Monitoring Teams who will be dispatched to pre-designated sampling sites.
 - c. Federal Radiological Monitoring & Assessment Center (FRMAC) Data
 - i. FRMAC will provide LDEQ with simulated flyover maps for the 50-mile EPZ with the flyover map, TEDE and CDE (evacuation) results.

- ii. Controller inject will provide the three maps, simultaneously, after the FMT briefing has concluded.
 - d. Sampling plan development may include the input of other State or Federal agencies.
 - e. For continuity and time restraints, a pre-developed sample plan will be injected by controllers to the LDEQ EOF Team.
- 6. Field Sampling
 - a. Field sampling will be conducted out-of-sequence, but concurrently with the other Ingestion Pathway activities.
 - b. LDEQ Field Monitoring Teams will be deployed to the field after being briefed by the Field Team Coordinator.
 - c. The sampling locations will be based upon the pre-developed sampling plan.
 - d. Controllers will provide the Field Team Coordinator with an inject noting the location for each FMT.
 - e. The following operations will be simulated:
 - i. operations checks of equipment at HQ or any staging location
 - ii. communications with HQ or the Field Team Coordinator
 - iii. sample transfer, and
 - iv. anti-contamination PPE.
 - f. LDEQ FMT 1 will collect soil, vegetation and water samples.
 - i. Sample collection will not take place at a location listed in the pre-developed sampling plan.
 - ii. Sample collection will take place at a location local to LDEQ HQ.

- g. LDEQ FMT 2 will sample milk from LSU AgCenter Dairy.
 - i. Sampling has been scheduled between 0900 and 1000 on June 9, 2010.
- h. After samples have been successfully obtained and procedures demonstrated, the LDEQ FMTs will return to HQ.

7. Dose Assessment

- a. Dose assessment calculations of the laboratory analysis results from sample media will be conducted out-of-sequence, but concurrently with the other Ingestion Pathway activities.
- b. Federal Radiological Monitoring & Assessment Center (FRMAC) Data
 - i. FRMAC will provide LDEQ with simulated results from the laboratory analysis of the samples collected based on the pre-developed sampling plan.
 - ii. For continuity and time restraints, laboratory analysis data will be provided to Dose Assessment by inject at 0800.
 - iii. Results for milk, soil, vegetation, and water will be injected simultaneously.
- c. Pre-developed DRL and DIL calculation results will be provided through controller inject to the LDEQ EOF Team for further analysis.

8. Accident Assessment

- a. Pre-calculated dose assessment results based upon sample analysis will be provided as controller injects to the LDEQ Accident Assessment Coordinator.
 - i. For continuity and time restraints, laboratory analysis data will be provided to Dose Assessment by inject at 0800.
 - ii. Results for milk, soil, vegetation, and water will be injected simultaneously.
- b. Federal Radiological Monitoring & Assessment Center (FRMAC)

- c. Data
 - i. FRMAC initially provides LDEQ with simulated flyover maps for the 50-mile EPZ with the flyover map, TEDE and CDE (evacuation) results.
 - ii. Based on the controller injects of the pre-developed sample plan and the simulated ground shine dose assessment results, FRMAC will provide LDEQ with a
 - iii. Relocation map including 1-year, 2-year, and 50-year PAGs.
 - iv. Based on the controller injects of the pre-developed sample plan and the simulated agricultural dose assessment results, FRMAC will provide LDEQ with maps plotting the isotopic I-131 and Cs-137 results from further simulated sampling.
 - v. As Dose Assessment and Sampling Planning are being conducted out-of-sequence, all data will be available to Accident Assessment at the beginning of the tabletop.
 - d. Based on the data provided, protective action recommendations for the milk, food and water pathways, and relocation, reentry and return recommendations for members of the public will be developed by LDEQ team members.
9. Media
- a. Media operations will take place at LDEQ HQ.
 - b. Media monitoring, rumor control, and mock media operations will be simulated.
 - c. No new briefings will occur during the tabletop.
 - d. Messages will be developed by spokespersons and other participants.
 - e. Any movement of the Joint Information Center will be simulated (i.e., from AJIC to JIC, AJIC to GOHSEP, or JIC to GOHSEP).

10. River Bend Station

- a. Participation from River Bend Station will be continue as technical support, general information, plant or event related information, and clarifications.

11. Meteorological Data

- a. Meteorological data for June 9, 2010 will be continued from the data developed during the plume phase on June 8, 2010.
- b. The forecast will be considered consistent with the previous data.
- c. No other meteorological data will be injected.

12. Southern Mutual Radiological Assistance Plan (SMRAP)

- a. SMRAP has been activated by LDEQ through the support of the Louisiana Governor.
- b. Any resources requested by LDEQ will be considered in the process of mobilization; however, no resources will arrive for use prior to the termination of the tabletop.

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