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Region V
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FEMA

FEB 0 4 2011

NRC Headquarters Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

To Whom It May Concern:

Enclosed is one copy of the Final Report for the September 28, 2010, Radiological Emergency Preparedness (REP) Partial Participation Plume Exposure Pathway Exercise for the Perry Nuclear Power Plant. The State of Ohio, Lake, Geauga and Ashtabula Counties, and the utility owner/operator, FirstEnergy Nuclear Corporation, participated in this exercise.

No Deficiencies were identified for any jurisdiction during this exercise. There were no Areas Requiring Corrective Action (ARCAs) identified for the State of Ohio during this exercise.

There was one prior ARCA for the State of Ohio under Criterion 2.b.1 – Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency that was resolved during this exercise.

There was one ARCA for Geauga County, identified under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby the Transportation Supervisor did not mention the administrative reporting limit of 1 R, nor the procedure for zeroing the dosimeters and completing the Emergency Worker Dosimetry Exposure Log. This ARCA was successfully re-demonstrated during the exercise.

There were two ARCAs identified for Lake County. The first ARCA for Lake County identified under 3.b.1 - Implementation of KI, whereby the police officer was unaware that individuals who were allergic to iodine or shellfish should not ingest KI and that those individuals with allergies to KI would not have been allowed to enter the Emergency Planning Zone. This ARCA was successfully re-demonstrated during the exercise.

The second ARCA for Lake County identified under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby TriPoint Medical Center was the primary MS-1 medical facility for the PNPP. The Radiation Technician had significant trouble when attempting to zero the DRDs. The controller provided on-the-spot training, after which the Technician began using

AXC45
LIRR

the charger in the correct orientation. This ARCA was successfully re-demonstrated during the exercise.

There was one Planning Issue identified for the State of Ohio, two Planning Issues identified for Lake County and one Planning Issue identified Ashtabula County during this exercise.

The Planning Issue Identified for the State of Ohio was issued under 2.b.1 – Appropriate Protective Action Recommendations are based on available data, whereby the Dose Assessment staff in the Lake County Assessment Room and the Field Monitoring Team Coordinators for the State and Lake County coordinated functions and timely sharing of information. However, the State procedures and standard (suggested) operating guidelines used by these individuals do not address these coordination methods used during the exercise.

The first Planning Issue identified for Lake County was issued under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby in accordance with the SOP checklist for the Radiation Technician, that person was responsible for zeroing direct-reading dosimeters and placing them on a hook in the treatment room. The SOP checklist provides for the Buffer Zone Nurse to distribute permanent record dosimeters (PRD). In the course of distributing the PRDs, a control PRD was not identified nor removed to another location. There is nothing written in the procedures or position checklists to ensure that a control PRD is identified and removed from the treatment suite to ensure a correct baseline reading is available when the hospital's mission is complete.

The second Planning Issue identified for Lake County was issued under 4.a.2 - Field Teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure, whereby the Lake County Field Monitoring Team Controller did not include a discussion of KI in the field team pre-deployment briefing. The Lake County Standard Operational Guidance for the Radiological Field Team Controller includes an Emergency Response Health and Safety Plan that forms the basis for the health and safety briefing given to the Field Teams prior to their departure. The information includes dosimetry requirements but does not mention the requirement for Field Monitoring Team Members to have KI or instructions for using KI.

The Planning Issue identified for Ashtabula County was issued under 2.a.1 - Emergency Worker Exposure Control, whereby the Ashtabula County Radiological Emergency Response Plan does not specifically state who will authorize an individual emergency worker to receive a dose in excess of pre-authorized levels.

A detailed discussion of these issues can be found in Part IV of the Final Report.

Based on the results of the October 7, 2008, exercise, the offsite radiological emergency response plans and preparedness for the State of Ohio and affected local jurisdictions, site-

specific to the Perry Nuclear Power Plant, can be implemented and are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public in the event of a radiological emergency at the site.

Therefore, the Title 44 CFR, Part 350, approval of the offsite radiological emergency response plans and preparedness for the State of Ohio site-specific to the Perry Nuclear Power Plant, granted on June 17, 1994, remain in effect.

Copies of this report have been provided to the DHS/FEMA National Office, Nuclear Regulatory Commission (NRC) Region III, and the State of Ohio.

If you have any questions, please contact William E. King, Chairman, Regional Assistance Committee, DHS/FEMA, Region V, at (312) 408-5575.

Sincerely,

Andrew Velasquez
Regional Administrator

Enclosure (1)

Perry Nuclear Power Plant

After Action Report/ Improvement Plan

Exercise Date - September 28, 2010

Radiological Emergency Preparedness (REP) Program

FEMA

Published February 04, 2011

Perry Nuclear Power Plant

After Action Report/Improvement Plan

Published January 24, 2011

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EXECUTIVE SUMMARY

On September 28, 2010, a Radiological Emergency Preparedness (REP) Partial Participation Plume Exposure Pathway Exercise was conducted for the 10-mile Emergency Planning Zone (EPZ) around the Perry Nuclear Power Plant by the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA). The purpose of the exercise was to assess the level of preparedness of State and local jurisdictions in responding to a radiological emergency. This exercise was held in accordance with DHS/FEMA policies and guidance concerning the exercise of State and local Radiological Emergency Response Plans (RERPs) and procedures.

The most recent exercise at this site was conducted on October 7, 2008. The qualifying emergency preparedness exercise was conducted on November 28, 1984.

DHS/FEMA wishes to acknowledge the efforts of the many individuals in the State of Ohio and Lake, Ashtabula and Geauga Counties, who participated in this exercise along with the State government.

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 on the part of all participants was evident during this exercise.

This Final Report contains the evaluation of the biennial exercise and the evaluation of the following out of sequence activities:

State of Ohio:

Alert and Notification on Lake Erie

Lake County:

Medical (MS-1) Services Drill
Traffic and Access Control Point
Field Monitoring Teams

Field Monitoring Teams Coordinator
Field Monitoring Teams Equipment Inventory
(EV-2) School Interview
Evacuee Monitoring/Decontamination/Registration
Evacuee Vehicle Monitoring and Decontamination
Distribution of KI to the General Public
Congregate Care Center
Back-up Route Alerting

Ashtabula County:

Backup Route Alerting
Emergency Worker Monitoring/Decontamination
Congregate Care Center
Emergency Worker Vehicle Monitoring/Decontamination
Medical (MS-1) Services Drill
Traffic and Access Control Point

Geauga County:

Back-up Route Alerting
(EV-2) School Interview

Except where noted in this report, the State and local organizations demonstrated knowledge of and adequately implemented their emergency response plans and procedures.

No Deficiencies were identified for any jurisdiction during this exercise.

There was one prior ARCA for the State of Ohio under Criterion 2.b.1 – Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency that was resolved during this exercise.

There was one ARCA for Geauga County, identified under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby the Transportation Supervisor did not mention the administrative reporting limit of 1 R, nor the procedure for zeroing the dosimeters and

completing the Emergency Worker Dosimetry Exposure Log. This ARCA was successfully re-demonstrated during the exercise.

There were two ARCAs identified for Lake County. The first ARCA identified under 3.b.1 - Implementation of KI, whereby the police officer was unaware that individuals who were allergic to iodine or shellfish should not ingest KI and that individual's with allergies to KI would not have been allowed to enter the Emergency Planning Zone. This ARCA was successfully re-demonstrated during the exercise.

The second ARCA for Lake County, identified under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby the Radiation Technician at the TriPoint Medical Center had significant trouble when attempting to zero the DRDs. The controller provided on-the-spot training, after which the Technician began using the charger in the correct orientation. This ARCA was successfully re-demonstrated during the exercise.

There was one Planning Issue identified for the State of Ohio, two Planning Issues identified for Lake County and one Planning Issue identified for Ashtabula County.

The Planning Issue Identified for the State of Ohio was issued under 2.b.1 – Appropriate Protective Action Recommendations are based on available data, whereby the Dose Assessment staff in the Lake County Assessment Room and the Field Monitoring Team Coordinators for the State and Lake County coordinated functions and timely sharing of information. However, the State procedures and standard (suggested) operating guidelines used by these individuals do not address these coordination methods used during the exercise.

The first Planning Issue identified for Lake County was issued under 3.a.1 - Implementation of Emergency Worker Exposure Control, whereby in accordance with the SOP checklist for the Radiation Technician, that person was responsible for zeroing direct-reading dosimeters and placing them on a hook in the treatment room. The SOP checklist provides for the Buffer Zone Nurse to distribute permanent record dosimeters (PRD). In the course of distributing the PRDs, a control PRD was not identified nor removed to another location. There is nothing written in the procedures or position checklists to ensure that a control PRD is identified and removed from the treatment suite to ensure a correct baseline reading is available when the hospital's mission is complete.

The second Planning Issue identified for Lake County was issued under 4.a.2 - Field Teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure, whereby the Lake County Field Monitoring Team Coordinator did not include a discussion of KI in the field team pre-deployment briefing. The Lake County Standard Operational Guidance for the Radiological Field Team Coordinator includes an Emergency Response Health and Safety Plan that forms the basis for the health and safety briefing given to the Field Teams prior to their departure. The information includes dosimetry requirements but does not mention the requirement for Field Monitoring Team Members to have KI or instructions for using KI.

The Planning Issue identified for Ashtabula County was issued under 2.a.1 - Emergency Worker Exposure Control, whereby the Ashtabula County Radiological Emergency Response Plan does not specifically state who will authorize an individual emergency worker to receive a dose in excess of pre-authorized levels.

INTRODUCTION - EXERCISE BASIS

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. DHS/FEMA activities are conducted pursuant to Title 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

The FEMA Title 44 CFR 350 establishes the policies and procedures for DHS/FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local governments' participation in joint exercises with licensees.

DHS/FEMA responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- Taking the lead in offsite emergency planning and in the review and evaluation of RERPs and procedures developed by State and local governments;

- Determining whether such plans and procedures can be implemented on the basis of

observation and evaluation of exercises of the plans and procedures conducted by State and local governments;

• Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17,1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and

• Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
- U.S. Department of Agriculture,
- U.S. Department of Commerce,
- U.S. Department of Energy,
- U.S. Environmental Protection Agency,
- U.S. Department of Health and Human Services,
- U.S. Department of the Interior,
- U.S. Department of Transportation,
- U.S. Food and Drug Administration and
- U.S. Nuclear Regulatory Commission.

Representatives of these agencies serve on the DHS/FEMA Regional Assistance Committee (RAC), which is chaired by DHS/FEMA.

Formal submission of the RERPs for the Perry Nuclear Power Plant to DHS/FEMA Region V by the State of Ohio and involved local jurisdictions occurred on January 23,1986. Formal approval of these RERPs was granted by FEMA on June 15, 1987, under 44 CFR 350.

A REP Partial Participation Plume Exposure Pathway Exercise was conducted on September 28, 2010, by DHS/FEMA to assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the publics health and safety during a radiological emergency involving the Perry Nuclear Power Plant. The purpose of this exercise report is to present the exercise results and findings on the performance of the offsite response organizations (ORO) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the Federal evaluator team,

with final determinations made by the DHS/FEMA RAC Chairman, and approved by DHS/FEMA Headquarters.

The criteria utilized in the DHS/FEMA evaluation process are contained in:

• NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980;

• FEMA-REP-14, "Radiological Emergency Preparedness Exercise Manual," September 1991; and

• FEMA "Radiological Emergency Preparedness: Exercise Evaluation Methodology," as published in Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002.

Section 1 of this report, entitled "Exercise Overview", presents information pertaining to the team that planned and coordinated the exercise. This section also provides a listing of all participating jurisdictions and functional entities that were evaluated.

Section 2 of this report, entitled "Exercise Design Summary", contains the purpose and design of the exercise, a description of the plume pathway EPZ, and presents basic information and data relevant to the exercise scenario.

Section 3 of this report, entitled "Analysis of Capabilities", presents detailed information on the demonstration of applicable exercise criteria at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. This section also contains: (1) descriptions of all Deficiencies and ARCAs (if any) assessed during this exercise, recommended corrective actions, if applicable, for each identified exercise issue; and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs' efforts to resolve them.

Section 4 of this report, entitled "Conclusion", presents the DHS/FEMA summary of overall exercise conduct and results as evaluated against the requirements of 44 CFR 350.

EMERGENCY PLANNING ZONE (EPZ) DESCRIPTION

The Perry Nuclear Power Plant (PNPP) reactor is located on the southeast shoreline of Lake Erie in Lake County, Ohio. The site is approximately seven miles northeast of Painesville, Ohio and 35 miles east of Cleveland, Ohio.

The plant site occupies approximately 1100 acres on a lake plain 50 feet above the lake low-water datum. The terrain surrounding the plant is essentially flat within five miles of the lakeshore. Rising generally to the south, the site is broken only by a lattice work of shallow, north-south stream beds and low, almost unnoticeable east-west ridges; the latter are remnants of ancient lake-shores. About five miles inland, the shoreline plane is abruptly cut by a 100-foot-deep ravine of the Grand River. The terrain south of the river is more rolling, interrupted by north-south ravines of tributaries of the Grand, Kellogg, Big, Paine and Mill creeks and several smaller streams. A large portion of the site is forested, some 250 acres are devoted to the plant structural complex and the remainder is open grassland.

Lake County, where the nuclear power plant is located, is the smallest of Ohio's 88 counties, with 232 square miles. The 2000 census approximates the population to be 102,920 residents currently within the 10-mile emergency planning zone (EPZ); 13,591 are residents of Geneva and Harpersfield Townships in Ashtabula County with an estimated 1,930 residents in Geauga County.

FirstEnergy Corporation owns the Perry Nuclear Power Plant.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name
Perry Nuclear Power Plant

Type of Exercise
Plume

Exercise Date
September 28, 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 Perry Nuclear Power Plant exercise:

State Jurisdictions

- Ohio Army National Guard
- Ohio Department of Health
- Ohio Department of Natural Resources - Division of Watercraft
- Ohio Emergency Management Agency
- Ohio Environmental Protection Agency
- Ohio State Highway Patrol

Ohio State University Extension

Risk Jurisdictions

Ashtabula County Amateur Radio Club
Ashtabula County Auditors Department
Ashtabula County Commissioners
Ashtabula County Courts
Ashtabula County Department of Jobs and Family Services
Ashtabula County Emergency Management Agency
Ashtabula County Engineers Office
Ashtabula County School Services
Ashtabula County Sheriff's Department
East Lake Fire Department
Geauga County County Commission
Geauga County Emergency Management
Geauga County Engineer/Transportation
Geauga County Fire/EMS
Geauga County Health Department
Geauga County School Services
Geauga County Sheriff's Department
Growth Partnership for Ashtabula County (PIO volunteer)
Lake County Amateur Radio Association
Lake County Central Communications
Lake County Commissioners
Lake County Emergency Management Agency
Lake County Engineer
Lake County General Health District
Lake County GIS
Lake County Health Department
Lake County Job and Family Services
Lake County Retired Senior Volunteer Program
Lake County Schools' Services
Lake County Sheriff's Office
LakeTran
Mentor Fire Department

North West Ambulance District

Perry Fire Department

RACES

Private Organizations

American Red Cross

First Energy Nuclear Operating Company

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

The DHS/FEMA Region V Office evalutated the PNPP Radiological Emergency Preparedness (REP) Partial Participation Plume Exposure Pathway Exercise conducted on September 28, 2010, to assess the capabilities of local emergency preparedness organizations in implementing their Radiological Emergency Response Plans (RERP) and procedures to protect the publics health and safety during a radiological emergency involving the PNPP. The purpose of this report is to present the results and findings on the performance of the Offsite Response Organizations (OROs) during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and identified Capabilities/REP Criteria selected to be demonstrated are discussed in Appendix D "Exercise Plan".

2.3 Scenario Summary

Appendix F, "Scenario Details", contains a summary of the Exercise Scenario, a simulated sequence of events, that was used as the basis for invoking emergency response actions by OROs in the PNPP REP Partial Participation Plume Exposure Pathway Exercise on September 28, 2010.

This exercise scenario was submitted by the State of Ohio and First Energy and accepted by DHS/FEMA Region V on August 23, 2010.

During the exercise, in addition to information and data provided through the PNPP onsite scenario, controllers from the State of Ohio provided "inject messages" containing scenario events and/or relevant data to those persons or locations who would normally receive notification of such events. These inject messages were the method used for invoking additional specific response actions by OROs.

The details of the scenario are included in Appendix F "Scenario Details".

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Exercise Evaluation and Results

Contained in this section are results and findings of the evaluation of all jurisdictions and functional entities that participated in the September 28, 2010, REP Partial Participation Plume Exposure Pathway Exercise to test the offsite emergency response capabilities of State and local governments in the 10-mile EPZ surrounding the Perry Nuclear Power Plant.

Each jurisdiction and functional entity was evaluated based on its demonstration of exercise criteria delineated in Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002. Detailed information on the exercise criteria and the extent-of-play agreement used in this exercise are found in Appendix D "Exercise Plan" of this report.

Presented below are definitions of the terms used in this report relative to the criteria demonstration status:

• M – Met: The status of a REP exercise Evaluation Area Criterion indicating that the participating Offsite Response Organization (ORO) demonstrated all demonstration criteria for the Evaluation Area Criterion to the level required in the extent-of-play agreement with no Deficiencies or ARCAs assessed in the current exercise and no unresolved prior ARCAs.

• D – Deficiency: An observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

• A – Area Requiring Corrective Action (ARCA) – An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety. Listing of the demonstrated exercise criteria under which one or more ARCAs was/were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of any ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.

• P – Plan Issue – An observed or identified inadequacy in the ORO's emergency plan or implementing procedures, rather than in the ORO's performance.

• N – Not Demonstrated – Exercise criteria that were not demonstrated as scheduled during this exercise and the reason(s) they were not demonstrated.

• Prior ARCAs - Resolved – Descriptions of ARCAs assessed during previous exercises that were resolved and the corrective actions demonstrated in this exercise.

• Prior ARCAs - Unresolved – Descriptions of ARCAs assessed during prior exercises that were not resolved in this exercise. Included is the reason the ARCA remains unresolved and recommended corrective actions to be demonstrated before or during the next exercise.

3.2 Summary Results of Exercise Evaluation

The matrix presented in Table 3.1, on the following page(s), presents the status of all exercise criteria from Federal Register Notice Vol. 67, No. 80, dated April 25, 2002, which were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. The criterion status box is blank if it was not scheduled for demonstration.

This subsection provides information on the evaluation of each participating jurisdiction and functional entity in a jurisdiction-based, issues-only format.

The DHS/FEMA has developed a standardized system for numbering exercise issues. This system is used to achieve consistency in numbering exercise issues among DHS/FEMA Regions and site-specific exercise reports within each Region. It also is used to expedite tracking of exercise issues on a nationwide basis.

The identifying number of Deficiencies, ARCAs, and Planning Issues includes the following elements, with each element separated by a hyphen (-).

• Plant Site Identifier – A two-digit number, corresponding to the Utility Billable Plant Site Code (47 for Perry Nuclear Power Plant).

• Exercise Year – The last two digits of the year the exercise was conducted.

• Criterion Number – An alpha and two-digit number corresponding to the criterion number in the six Exercise Evaluation Areas described in Federal Register Notice, Vol. 67, No. 80, dated April 25, 2002, which amends FEMA-REP 14, Radiological Emergency Preparedness Exercise Manual.

• Issue Classification Identifier – (D = Deficiency, A = ARCA, P = Planning Issue).

• Exercise Identification Number – A separate two or three-digit indexing number assigned to each issue identified in the exercise.

Table 3.1 - Summary of Exercise Evaluation (4 pages)

DATE: 2010-09-28 SITE: Perry Nuclear Power Plant, OH M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		OH-INP---	OH-EOC-ER---	OH-EOC-AR---	OH-EOC-JIC---	OH-Lakeland CC-JIC-	OH-EOF---	OH-EOC LAK-SRAnalysis--	OH--ODNR-Route Alert-	LAK-INP---	LAK-EOC---	LAK---FMTC-
Emergency Operations Management												
Mobilization	1a1	M	M	M	M	M	M	M		M	M	M
Facilities	1b1											
Direction and Control	1c1		M	M		M					M	
Communications Equipment	1d1	M	M	M	M	M	M	M	M	M	M	
Equip & Supplies to support operations	1e1		M	M		M			M		M	
Protective Action Decision Making												
Emergency Worker Exposure Control	2a1		M	M				M			M	M
Radiological Assessment and PARs	2b1		M	P				M			M	
Decisions for the Plume Phase - PADs	2b2		M	M				M			M	M
PADs for protection of special populations	2c1		M	M				M			M	M
Rad Assessment and Decision making for Ingestion Pathway	2d1											
Rad Assess/Decision making concerning Relocation, Reentry, and Return	2e1											
Protective Action Implementation												
Implementation of emergency worker exposure control	3a1						M		M		M	
Implementation of KI decision	3b1						M		M		M	
Implementation of protective actions for special populations - EOCs	3c1										M	
Implementation of protective actions for Schools	3c2										M	
Implementation of traffic and access control	3d1		M	M							M	
Impediments to evacuation are identified and resolved	3d2										M	
Implementation of ingestion pathway decisions - availability/use of info	3e1											
Materials for Ingestion Pathway PADs are available	3c2											
Implementation of relocation, re-entry, and return decisions	3f1											
Field Measurement and Analysis												
Adequate Equipment for Plume Phase Field Measurements	4a1											
Field Teams obtain sufficient information	4a2											P
Field Teams Manage Sample Collection Appropriately	4a3											
Post plume phase field measurements and sampling	4b1											
Laboratory operations	4c1											
Emergency Notification and Public Info												
Activation of the prompt alert and notification system	5a1		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											
Emergency information and instructions for the public and the media	5b1				M	M					M	
Support Operations/Facilities												
Mon/Decon of evacuees and EWs and registration of evacuees	6a1											
Mon/Decon of EW worker equipment	6b1											
Temporary care of evacuees	6c1											
Transportation and treatment of contaminated injured individuals	6d1											

Table 3.1 - Summary of Exercise Evaluation (Continued. page 2/4)

DATE: 2010-09-28 SITE: Perry Nuclear Power Plant, OH M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		LAK-Lakeland CC-JIC--	LAK--FMT#1--	LAK--FMT#2--	LAK--Leroy FD-Bu Rt Alert-	LAK--Fairport Harbor SD-EV2-	LAK-Kirtland HS-Kirtland FD-EvR-	LAK-Kirtland HS-Kirtland FD-EvM-	LAK-Kirtland HS-Kirtland FD-EvD-	LAK-Kirtland HS-Kirtland FD-	LAK-Kirtland HS--CCC-	LAK--Madison FD-MS1T-
Emergency Operations Management												
Mobilization	1a1		M	M								
Facilities	1b1											
Direction and Control	1c1									M		
Communications Equipment	1d1	M	M	M	M	M				M	M	M
Equip & Supplies to support operations	1e1	M	M	M	M	M				M		M
Protective Action Decision Making												
Emergency Worker Exposure Control	2a1											
Radiological Assessment and PARs	2b1											
Decisions for the Plume Phase - PADs	2b2											
PADs for protection of special populations	2c1											
Rad Assessment and Decision making for Ingestion Pathway	2d1											
Rad Assess/Decision making concerning Relocation, Reentry, and Return	2e1											
Protective Action Implementation												
Implementation of emergency worker exposure control	3a1		M	M	M	M		M	M			M
Implementation of KI decision	3b1		M	M	M	M		M				M
Implementation of protective actions for special populations - EOCs	3c1											
Implementation of protective actions for Schools	3c2					M						
Implementation of traffic and access control	3d1											
Impediments to evacuation are identified and resolved	3d2											
Implementation of ingestion pathway decisions - availability/use of info	3e1											
Materials for Ingestion Pathway PADs are available	3e2											
Implementation of relocation, re-entry, and return decisions	3f1											
Field Measurement and Analysis												
Adequate Equipment for Plume Phase Field Measurements	4a1		M	M								
Field Teams obtain sufficient information	4a2											
Field Teams Manage Sample Collection Appropriately	4a3		M	M								
Post plume phase field measurements and sampling	4b1											
Laboratory operations	4c1											
Emergency Notification and Public Info												
Activation of the prompt alert and notification system	5a1											
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										
Support Operations/Facilities												
Mon/Decon of evacuees and EWs and registration of evacuees	6a1						M	M	M	M		
Mon/Decon of EW worker equipment	6b1											

Temporary care of evacuees	6c1										M	
Transportation and treatment of contaminated injured individuals	6d1											M

Table 3.1 - Summary of Exercise Evaluation (Continued. page 3/4)

DATE: 2010-09-28 SITE: Perry Nuclear Power Plant, OH M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		LAK-Tri-Point MC--MS1F-	LAK-Madison Local--EV2-	LAK--Perry Village PD-TCP/ACP-	LAK--Perry Village PD-TCP/ACP-Inter	LAK--Grand River PD-TCP/ACP-Brief	LAK--Grand River PD-TCP/ACP-Inter	ASH-INP---	ASH-EOC---	ASH-Lakeland CC-JIC--	ASH--Saybrook FD-EWMDEqV-	ASH--Saybrook FD-EWMD-
Emergency Operations Management												
Mobilization	1a1							M	M			
Facilities	1b1											
Direction and Control	1c1								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
Protective Action Decision Making												
Emergency Worker Exposure Control	2a1								P			
Radiological Assessment and PARs	2b1											
Decisions for the Plume Phase - PADs	2b2								M			
PADs for protection of special populations	2c1								M			
Rad Assessment and Decision making for Ingestion Pathway	2d1											
Rad Assess/Decision making concerning Relocation, Reentry, and Return	2e1											
Protective Action Implementation												
Implementation of emergency worker exposure control	3a1	P	M	M	M	M	M		M		M	M
Implementation of KI decision	3b1		M	M	M	M	M		M			
Implementation of protective actions for special populations - EOCs	3c1								M			
Implementation of protective actions for Schools	3c2		M						M			
Implementation of traffic and access control	3d1				M		M		M			
Impediments to evacuation are identified and resolved	3d2								M			
Implementation of ingestion pathway decisions - availability/use of info	3e1											
Materials for Ingestion Pathway PADs are available	3e2											
Implementation of relocation, re-entry, and return decisions	3f1											
Field Measurement and Analysis												
Adequate Equipment for Plume Phase Field Measurements	4a1											
Field Teams obtain sufficient information	4a2											
Field Teams Manage Sample Collection Appropriately	4a3											
Post plume phase field measurements and sampling	4b1											
Laboratory operations	4c1											
Emergency Notification and Public Info												
Activation of the prompt alert and notification system	5a1								M			
Activation of the prompt alert and notification system - Fast Breaker	5a2											
Activation of the prompt alert and notification system - Exception areas	5a3											
Emergency information and instructions for the public and the media	5b1								M	M		
Support Operations/Facilities												
Mon/Decon of evacuees and EWs and registration of evacuees	6a1											M
Mon/Decon of EW worker equipment	6b1										M	

Temporary care of evacuees	6c1											
Transportation and treatment of contaminated injured individuals	6d1	M										

Table 3.1 - Summary of Exercise Evaluation (Continued. page 4/4)

DATE: 2010-09-28 SITE: Perry Nuclear Power Plant, OH M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		ASH--Northwest AmbD-MS1T-	ASH--Geneva PD-TCP/ACP-Brief	ASH--Geneva PD-TCP/ACP-Inter	ASH--Harpersfield VFD-Bu Rt Alert-Brief	GEA-INP---	GEA-EOC---	GEA-EOC-Shrif RP&DosiCord-TACP Inc DCO-	GEA-Lakeland CC--JIC-	GEA--Thompson VFD-Route Alert-	GEA--Ledgemont SD-EV2-
Emergency Operations Management											
Mobilization	1a1					M	M				
Facilities	1b1										
Direction and Control	1c1						M				
Communications Equipment	1d1	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
Protective Action Decision Making											
Emergency Worker Exposure Control	2a1						M				
Radiological Assessment and PARs	2b1										
Decisions for the Plume Phase - PADs	2b2						M				
PADs for protection of special populations	2c1						M				
Rad Assessment and Decision making for Ingestion Pathway	2d1										
Rad Assess/Decision making concerning Relocation, Reentry, and Return	2e1										
Protective Action Implementation											
Implementation of emergency worker exposure control	3a1	M	M	M	M		M	M		M	M
Implementation of KI decision	3b1	M	M	M	M		M	M		M	M
Implementation of protective actions for special populations - EOCs	3c1						M				
Implementation of protective actions for Schools	3c2						M				M
Implementation of traffic and access control	3d1			M			M	M			
Impediments to evacuation are identified and resolved	3d2						M				
Implementation of ingestion pathway decisions - availability/use of info	3e1										
Materials for Ingestion Pathway PADs are available	3e2										
Implementation of relocation, re-entry, and return decisions	3f1										
Field Measurement and Analysis											
Adequate Equipment for Plume Phase Field Measurements	4a1										
Field Teams obtain sufficient information	4a2										
Field Teams Manage Sample Collection Appropriately	4a3										
Post plume phase field measurements and sampling	4b1										
Laboratory operations	4c1										
Emergency Notification and Public Info.											
Activation of the prompt alert and notification system	5a1						M				
Activation of the prompt alert and notification system - Fast Breaker	5a2										
Activation of the prompt alert and notification system - Exception areas	5a3				M					M	
Emergency information and instructions for the public and the media	5b1						M		M		

Support Operations/Facilities											
Mon/Decon of evacuees and EWs and registration of evacuees	6a1										
Mon/Decon of EW worker equipment	6b1										
Temporary care of evacuees	6c1										
Transportation and treatment of contaminated injured individuals	6d1	M									

3.3 Criteria Evaluation Summaries

3.3.1 Ohio Jurisdictions

3.3.1.1 State of Ohio - Initial Notification Point

a. MET: 1.a.1, 1.d.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 State of Ohio - Emergency Operations Center - Executive Room

a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.d.1, 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

3.3.1.3 State of Ohio - Emergency Operations Center - Assessment Room

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

ISSUE NO.: 47-10-2b1-P-01

CRITERION: Appropriate PARs are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on and off site environmental conditions.

CONDITION: The Dose Assessment Staff in the State EOC Assessment Room and the Lake County EOC and, the field monitoring team coordinators for the State and

Lake County EOC performed well during the Perry exercise exhibiting good teamwork, coordination of functions and timely sharing of information. However, the procedures and standard (suggested) operating guidelines used by these individuals are mostly silent on the coordination methods used during the exercise.

POSSIBLE CAUSE: The turnover in personnel and, a recent change in coordination methodology partly to correct the Beaver Valley ARCA on dose assessment did not get put into the procedures and operating guidelines.

REFERENCE: 1. NUREG 0654, I.8, and I.10.
2. State EOC SOP-2010 Field Monitoring Team Controller Rev date 6/21/2010.
3. State Environmental Protection Agency Monitoring Team Communicator, Radiological Response Guidelines, App. 3 Dose Assessment Room.
4. State OEMA procedure Rad Systems Operator Dose Assessment, OPS-5, 2/24/10.
5. State ODH TSM-EM-202, BRP-2009-005 Dose Assessment Coordinator: Emergency Phase, Rev 3, 03/15/2010.
6. Lake County Field Monitoring Team Coordinator, SOG, Vol. 1, Rev 11, July 2008.
7. Lake County Field Team Leader, SOG Vol. 1, Rev 11, July 2008.

EFFECT: Absence of such instructions will not assure the continued coordination in the manner demonstrated during the Perry exercise. Turnover of personnel will also result in a loss of continuity in performance if only trivial knowledge is relied upon.

RECOMMENDATION: The State Assessment Room dose assessment personnel's procedures (Reference 4, 5) should include the maintenance of close communication during the preparation of dose projections with the Lake County Dose Assessment person. There should be a procedure for the State person who does the Lake County dose assessment and it should include the instruction for the maintenance of close communication during the preparation of dose projections with the State Assessment Room dose assessment person. The need to obtain reasonable agreement with the two dose projection results and that of PNPP should be included in both procedures.

The State Field Monitoring Team Coordinator and Monitoring Team Communicator procedure and guidelines (Reference 2 and 3) should include the instruction to

closely work with the Lake County Field Monitoring Team Coordinator and Team Leader (Reference 6 and 7) in the coordination of deployment strategy and the sharing of field team results. The Lake County FMTC and FMTL operating guidelines (Reference 6 and 7) should also be updated to include the new titles of the State personnel and new coordination approach.

e. NOT DEMONSTRATED: None
f. PRIOR ISSUES - RESOLVED: 2.b.1.

ISSUE NO.: 03-10-2b1-A-01

ISSUE: The State of Ohio Dose Assessment Team did not demonstrate a reliable capability to independently develop dose projections and compare them with those provided by the licensee or Columbiana County. Dose projections were not calculated properly and the Dose Assessment Coordinator did not properly review the calculations; therefore, the miscalculation went unnoticed, and the dose was significantly greater than what the Dose Assessment Team determined.

CORRECTIVE ACTION DEMONSTRATED: During the Perry exercise, the State Assessment Room, Rad Systems Operator for Dose Assessment worked closely with the Lake County Dose Assessment person and their results were in agreement with the PNPP dose projection. In addition, the State Department of Health Dose Assessment Coordinator in the Assessment Room provided a quality assurance review and oversight function to ensure the accuracy of the dose projection results. The Dose projection procedures have been revised.

g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.4 State of Ohio - Emergency Operations Center - Joint Information Center

a. MET: 1.a.1, 1.d.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

3.3.1.5 State of Ohio - Lakeland Community College - Joint Information Center

a. MET: 1.a.1, 1.c.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

3.3.1.6 State of Ohio - Emergency Operations Facility

a. MET: 1.a.1, 1.d.1, 3.a.1, 3.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

3.3.1.7 State of Ohio - Lake County Emergency Operations Center - State Radiological Analyst

a. MET: 1.a.1, 1.d.1, 2.a.1, 2.b.1, 2.b.2, 2.c.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

3.3.1.8 State of Ohio - Department of Natural Resources - Route Alerting

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 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

3.3.2 Risk Jurisdictions

3.3.2.1 Lake County - Initial Notification Point

a. MET: 1.a.1, 1.d.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

3.3.2.2 Lake County - Emergency Operations Center

a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.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

3.3.2.3 Lake County - Field Monitoring Team Coordinator

a. MET: 1.a.1, 2.a.1, 2.b.2, 2.c.1.
b. AREAS REQUIRING CORRECTIVE ACTION: None
c. DEFICIENCY: None
d. PLAN ISSUES: 4.a.2.

ISSUE NO.: 47-10-4a2-P-02

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

CONDITION: The Lake County Field Monitoring Team Coordinator did not include a discussion of KI in the field team pre-deployment briefing.

POSSIBLE CAUSE: The Lake County Standard Operational Guidance for Radiological Field Teams Volume 1, Revision 12, includes Standard Operational Guidance for the Radiological Field Team Controller (FMTC SOG). The FMTC SOG includes an Emergency Response Health and Safety Plan as Attachment 2 that forms the basis for the health and safety briefing given to the Field Teams prior to their departure. The information in Attachment 2 includes dosimetry requirements but does not mention the requirement for Field Monitoring Team Members to have KI, nor instructions for using KI.

REFERENCE: Lake County Standard Operational Guidance for Radiological Field Teams Volume 1, Revision 12, FMTC SOG Attachment 2, Section D (page A-5 of the FMTC SOG).

EFFECT: The FMTC and Field Monitoring Team Members could be unaware of the need to have KI available to the Field Monitoring Team Members, and also may not be aware of the protocols for using KI and its risks. During this exercise the teams were supplied with KI, and the information on taking KI and documenting that fact were transmitted at the time the Field Teams were told to take KI. No effect on exercise play was observed.

RECOMMENDATION: Add a reference to KI in Section D of the FMTC SOG alongside the reference to the dosimetry requirements. This would remind the FMTC to mention the KI protocols during field team pre-deployment briefing.

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

3.3.2.4 Lake County - Lakeland Community College - Joint Information Center

a. MET: 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

3.3.2.5 Lake County - Field Monitoring Team #1

a. MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.3.
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

3.3.2.6 Lake County - Field Monitoring Team #2

a. MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.3.
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 Lake County - Leroy Fire Department - Backup Route Alerting

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 5.a.3.
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

3.3.2.8 Lake County - Fairport Harbor School District - Evacuation School

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.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

3.3.2.9 Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Registration

a. MET: 6.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

3.3.2.10 Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Monitoring

a. MET: 3.a.1, 3.b.1, 6.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

3.3.2.11 Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Decontamination

a. MET: 3.a.1, 6.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

3.3.2.12 Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Monitoring and Decontamination of Vehicles

a. MET: 1.c.1, 1.d.1, 1.e.1, 6.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

3.3.2.13 Lake County - Kirtland High School - Congregate Care Center

a. MET: 1.d.1, 6.c.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

3.3.2.14 Lake County - Madison Fire District - Medical Service - Transportation

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 6.d.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

3.3.2.15 Lake County - Tri-Point Medical Center - Medical Service - Facility

a. MET: 1.d.1, 1.e.1, 6.d.1.

b. AREAS REQUIRING CORRECTIVE ACTION: 3.a.1.

ISSUE NO.: 47-10-3a1-A-07

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: TriPoint Medical Center (TPMC) was the primary MS-1 medical facility for the Perry Nuclear Power Plant (PNPP). The Standard Operating Procedure (SOP) specifies dosimetry in accordance with State of Ohio requirements – which is present and within appropriate calibration dates.

In accordance with the SOP checklist for the Radiation Technician, that person was responsible for zeroing direct-reading dosimeters (DRD) and placing them on a hook in the treatment room.

The Radiation Technician had significant trouble when attempting to zero one of the DRDs. She had positioned the DRD in the CD V-750 charger backwards. She attempted to charge three or four different DRDs when they were in the incorrect position.

POSSIBLE CAUSE: This was likely due to a lack of familiarization of procedures and practice on the part of the Radiation Technician.

REFERENCE: NUREG-0654, K.3.

EFFECT: There was the potential for not having DRDs that were zeroed in place prior to the potentially contaminated injured victim arriving in the Radiolodical Emergency Area.

CORRECTIVE ACTION DEMONSTRATED: The controller intervened and

conducted training to the Radiation Technician on the proper positioning of the DRD in the Charger. Training was also conducted informing the Technician that the wire inside the charger will often become oxidized, preventing a proper connection with the DRD and making zeroing the instrument difficult. After additional instruction on the proper cleaning of the wire, the Radiation Technician was able to properly zero the DRD.

These activities were successfully re-demonstrated following additional training by the controller.

c. DEFICIENCY: None
d. PLAN ISSUES: 3.a.1.

ISSUE NO.: 47-10-3a1-P-06

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: TriPoint Medical Center (TPMC) was the primary MS-1 medical facility for the Perry Nuclear Power Plant (PNPP). The Standard Operating Procedure (SOP) specifies dosimetry in accordance with State of Ohio requirements – which was present and within appropriate calibration dates.

In accordance with the SOP checklist for the Radiation Technician, that person was responsible for zeroing direct-reading dosimeters and placing them on a hook in the treatment room. The SOP checklist provides for the Buffer Zone Nurse to distribute permanent record dosimeters (PRD). In the course of distributing the PRDs, a control PRD was not identified nor removed to another location.

POSSIBLE CAUSE: There is nothing written in the procedures or position checklists to ensure that a "control" PRD is identified and removed from the treatment suite to ensure a correct "baseline" reading is available when the hospital's mission is complete.

REFERENCE: NUREG-0654, K.3.

EFFECT: Without a "baseline" PRD reading, it is not possible to compute an actual total effective dose equivalent (TEDE) for an individual.

RECOMMENDATION: The TPMC should revise their SOP to identify an individual who will be responsible for ensuring that a control PRD is identified and given to a specific position in the Emergency Room facility.

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

3.3.2.16 Lake County - Madison Local - Evacuation School

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.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

3.3.2.17 Lake County - Perry Village Police Department - Traffic Control Point/Access Control Point - Briefing

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.18 Lake County - Perry Village Police Department - Traffic Control Point/Access Control Point - Interview

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.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

3.3.2.19 Lake County - Grand River Police Department - Traffic Control Point/Access Control Point - Briefing

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.20 Lake County - Grand River Police Department - Traffic Control Point/Access Control Point - Interview

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.1.
b. AREAS REQUIRING CORRECTIVE ACTION: 3.b.1.

ISSUE NO.: 47-10-3b1-A-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 police officer was unaware that individuals who were allergic to iodine or shellfish should not ingest KI and that individuals with allergies to KI would not have been allowed to enter the 10-Emergency Planning Zone (EPZ).

POSSIBLE CAUSE: The police officer was unfamiliar with the Suggested Operating Guidelines.

REFERENCE: NUREG-0654, E.7., J.10.e.f.

"Suggested Operating Guidelines for an Emergency at the Perry Nuclear Power Plant, EPZ Police Departments," p. 3-1 and 3-2, revision May 2010.

"Potassium Iodide Package Insert"

EFFECT: This could result in physical harm to a police officer. Had the officer been allergic, this lack of knowledge may have been hazardous to the police officer's health.

CORRECTIVE ACTION DEMONSTRATED: At the end of the interview, the Controller reviewed the usage of KI with the police officer. The police officer then correctly re-demonstrated this portion of the interview.

c. DEFICIENCY: None
d. PLAN ISSUES: None
e. NOT DEMONSTRATED: None
f. PRIOR ISSUES - RESOLVED: None
g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.21 Ashtabula County - Initial Notification Point

a. MET: 1.a.1, 1.d.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

3.3.2.22 Ashtabula County - Emergency Operations Center

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

ISSUE NO.: 47-10-2a1-P-03

CRITERION: OROs use a decision-making process 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 admin or PAGs.

CONDITION: The Ashtabula County Radiological Emergency Response Plan does not specifically state who will authorize an individual emergency worker to receive a dose in excess of pre-authorized levels. The extent-of-play agreement and scenario did not test this capability.

POSSIBLE CAUSE: The Ashtabula County Radiological Emergency Response Plan implies that the authority for this decision lies with the Ashtabula County Emergency Operations Center (EOC) Executive Director and Control Group and states that the Radiological Officer is responsible for monitoring and controlling exposures of all County emergency workers.

The State of Ohio Radiological Emergency Response Plan implies that the Ohio Department of Health must make this decision. The individual response organizations' Suggested Operating Guidelines refer the individual emergency worker to the Dosimeter Coordinator.

The plan should not imply that there is a pre-authorization for emergency workers to exceed EPA General Public Protective Action Guides.

REFERENCE: NUREG-0654 K.4 "Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency

workers and lifesaving activities)."

REP Interim Exercise Evaluation Guide, June 22, 2002, 2.a.1 "According to the ORO's plan/procedures and the extent-of-play agreement: Who will authorize exposure levels to emergency workers in excess of pre-authorized levels?"

EFFECT: If there is a need to consider emergency worker dose in excess of the pre-authorized limit, there will likely be either a delay in authorizing the dose and threat to completing the mission or the misconception that pre-authorization to exceed exists at a much lower level than intended.

RECOMMENDATION: The plan should depict, either verbally, graphically, or both, the communication chain for an emergency worker to request authorization to exceed the EPA General Public Protective Action Guides or some lower administrative limit and the communication/command chain to grant the authorization.

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

3.3.2.23 Ashtabula County - Lakeland Community College - Joint Information Center

a. MET: 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

3.3.2.24 Ashtabula County - Saybrook Fire Department - Emergency Worker Monitoring and Decontamination of Equipment and Vehicles

a. MET: 1.d.1, 1.e.1, 3.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

3.3.2.25 Ashtabula County - Saybrook Fire Department - Emergency Worker Monitoring and Decontamination

a. MET: 1.d.1, 1.e.1, 3.a.1, 6.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

3.3.2.26 Ashtabula County - Northwest Ambulance District - Medical Service - Transportation

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 6.d.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

3.3.2.27 Ashtabula County - Geneva Police Department - Traffic Control Point/Access Control Point - Briefing

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.28 Ashtabula County - Geneva Police Department - Traffic Control Point/Access Control Point - Interview

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.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

3.3.2.29 Ashtabula County - Harpersfield Volunteer Fire Department - Backup Route Alerting - Briefing

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 5.a.3.
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

3.3.2.30 Geauga County - Initial Notification Point

a. MET: 1.a.1, 1.d.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

3.3.2.31 Geauga County - Emergency Operations Center

a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.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

3.3.2.32 Geauga County - Emergency Operations Center - Sheriffs Road Patrol & Dosimetry Coordinator - Traffic and Access Control Briefing Including DCO Briefing

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.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

3.3.2.33 Geauga County - Lakeland Community College - Joint Information Center

a. MET: 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

3.3.2.34 Geauga County - Thompson Volunteer Fire Department - Route Alerting

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 5.a.3.
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

3.3.2.35 Geauga County - Ledgemont School District - Evacuation School

a. MET: 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.2.

b. AREAS REQUIRING CORRECTIVE ACTION: 3.a.1.

ISSUE NO.: 47-10-3a1-A-04

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: The Transportation Supervisor did not mention the administrative reporting limit of 1 R (bus driver should contact the supervisor), nor the procedure for the Transportation Supervisor to zero the dosimeters and complete the Emergency Worker Dosimetry Exposure Log before giving the dosimetry packet to the bus driver. These steps are provided as a checklist in the Ledgemont Local School District Suggested Operating Guideline (SOG) for an emergency at the PNPP (Rev. 10/09).

POSSIBLE CAUSE: Training and lack of familiarity with the Ledgemont Local School District Suggested Operating Guideline for an emergency at the PNPP (Rev. 10/09).

REFERENCE: NUREG-0654
II. Planning Standards and Evaluation Criteria
K. Radiological Exposure Control
3.b Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.

EFFECT: Not zeroing the dosimeter could cause a false high dosimeter reading; not completing the Emergency Worker Dosimeter Exposure Log could result in an extended time in reading each dosimeter, and would not enable the appropriate record management for emergency workers; not including the 1 R administrative reporting value during the dosimetry briefing could cause the emergency worker to

be at higher risk for radiation exposure.

CORRECTIVE ACTION DEMONSTRATED: During the re-demonstration, the Transportation Supervisor successfully completed the dosimetry briefing to include zeroing the dosimeters, completing the Emergency Worker Dosimetry Exposure Log before presenting the dosimetry packet to the driver, and advising that exceeding the administrative limit of 1 R requires the driver to contact the Transportation Supervisor after being retrained by the Controller.

c. DEFICIENCY: None
d. PLAN ISSUES: None
e. NOT DEMONSTRATED: None
f. PRIOR ISSUES - RESOLVED: None
g. PRIOR ISSUES - UNRESOLVED: None

SECTION 4: CONCLUSION

The Radiological Emergency Preparedness (REP) Partial Participation Plume Exposure Pathway Exercise of September 28, 2010, resulted in one ARCA Corrected on the Spot for Geauga County, and two ARCAs Corrected on the Spot for Lake County. A previous ARCA for the State of Ohio from the 2010 Beaver Valley Full Participation REP Exercise was resolved. There was one Planning Issue for the State of Ohio, two Planning Issues for Lake County, and one Planning Issue for Ashtabula County.

APPENDIX A: IMPROVEMENT PLAN

Issue Number: 47-10-2a1-P-03	**Criterion: 2a1**
ISSUE: The Ashtabula County Radiological Emergency Response Plan does not specifically state who will authorize an individual emergency worker to receive a dose in excess of pre-authorized levels. The extent-of-play agreement and scenario did not test this capability.	
RECOMMENDATION: The plan should depict, either verbally, graphically, or both, the communication chain for an emergency worker to request authorization to exceed the EPA General Public Protective Action Guides or some lower administrative limit and the communication/command chain to grant the authorization.	
CORRECTIVE ACTION DESCRIPTION: The county RERP has been revised under section K.5 "Exposure Control and limits" to identify the procedure for extension of dose limits for emergency responders. The SOG's relating to this plan section will also be revised in early 2011.	
CAPABILITY: Emergency Operations Center Management	PRIMARY RESPONSIBLE AGENCY: Ashtabula County
CAPABILITY ELEMENT: Planning	START DATE: 2010-12-10
AGENCY POC: George Sabo 440-576-9148	ESTIMATED COMPLETION DATE: 2011-02-24

Issue Number: 47-10-4a2-P-02	**Criterion: 4a2**
ISSUE: The Lake County Field Monitoring Team Coordinator did not include a discussion of KI in the field team pre-deployment briefing.	
RECOMMENDATION: Add a reference to KI in Section D of the FMTC SOG alongside the reference to the dosimetry requirements. This would remind the FMTC to mention the KI protocols during field team pre-deployment briefing.	
CORRECTIVE ACTION DESCRIPTION: An addition of specific KI Briefing Text will be made to the Health and Safety portion of the Lake County Health Department Field Monitoring Team procedure. This procedure will be revised in January 2011.	
CAPABILITY: Responder Safety and Health	PRIMARY RESPONSIBLE AGENCY: Lake County
CAPABILITY ELEMENT: Planning	START DATE:
AGENCY POC: Larry D. Greene 440-350-5499	ESTIMATED COMPLETION DATE: 2011-01-30

Issue Number: 47-10-3a1-P-06	**Criterion: 3a1**
ISSUE: TriPoint Medical Center (TPMC) was the primary MS-1 medical facility for the Perry Nuclear Power Plant (PNPP). The Standard Operating Procedure (SOP) specifies dosimetry in accordance with State of Ohio requirements – which was present and within appropriate calibration dates. In accordance with the SOP checklist for the Radiation Technician, that person was responsible for zeroing direct-reading dosimeters and placing them on a hook in the treatment room. The SOP checklist provides for the Buffer Zone Nurse to distribute permanent record dosimeters (PRD). In the course of distributing the PRDs, a control PRD was not identified nor removed to another location.	
RECOMMENDATION: The TPMC should revise their SOP to identify an individual who will be responsible for ensuring that a control PRD is identified and given to a specific position in the Emergency Room facility.	
CORRECTIVE ACTION DESCRIPTION: A revision will be made to the TriPoint/LakeWest Medical Centers' SOG checklist for the person who is in charge of dosimetry in the REA. The checklist will instruct that the control PRD is to be removed from the proximity of the REA to a remote location. The SOG will be revised in January 2011 to reflect the change.	
CAPABILITY: Medical Supplies Management and Distribution	PRIMARY RESPONSIBLE AGENCY: Lake County
CAPABILITY ELEMENT: Planning	START DATE:
AGENCY POC: Larry D. Greene 440-350-5499	ESTIMATED COMPLETION DATE: 2011-01-30

Issue Number: 47-10-2b1-P-01	**Criterion: 2b1**
ISSUE: The Dose Assessment Staff in the State EOC Assessment Room and the Lake County EOC and, the field monitoring team coordinators for the State and Lake County EOC performed well during the Perry exercise exhibiting good teamwork, coordination of functions and timely sharing of information. However, the procedures and standard (suggested) operating guidelines used by these individuals are mostly silent on the coordination methods used during the exercise.	
RECOMMENDATION: The State Assessment Room dose assessment personnel's procedures (Reference 4, 5) should include the maintenance of close communication during the preparation of dose projections with the Lake County Dose Assessment person. There should be a procedure for the State person who does the Lake County dose assessment and it should include the instruction for the maintenance of close communication during the preparation of dose projections with the State Assessment Room dose assessment person. The need to obtain reasonable agreement with the two dose projection results and that of PNPP should be included in both procedures. The State Field Monitoring Team Coordinator and Monitoring Team Communicator procedure and guidelines (Reference 2 and 3) should include the instruction to closely work with the Lake County Field Monitoring Team Coordinator and Team Leader (Reference 6 and 7) in the coordination of deployment strategy and the sharing of field team results. The Lake County FMTC and FMTL operating guidelines (Reference 6 and 7) should also be updated to include the new titles of the State personnel and new coordination approach.	
CORRECTIVE ACTION DESCRIPTION: To ensure continued adequate communication and coordination, procedures for the Field Monitoring Team Coordinator and Radiological Systems Operator at Lake County EOC (dose assessment) will be revised to include provisions requiring communications with each other and county personnel. These revisions will be completed in April, 2011.	
CAPABILITY: Communications	PRIMARY RESPONSIBLE AGENCY: State of Ohio
CAPABILITY ELEMENT: Personnel	START DATE:
AGENCY POC: Carol O'Claire 614-799-3915	ESTIMATED COMPLETION DATE: 2011-04-24

APPENDIX B: EXERCISE TIMELINE

Table 1 on the following page, presents the time at which key events and activities occurred during the Perry Nuclear Power Plant REP Partial Participation Plume Exposure Pathway Exercise on September 28, 2010. Also included are times notifications were made to the participating jurisdictions/functional entities.

Table 1 - Exercise Timeline

DATE: 2010-09-28, SITE: Perry Nuclear Power Plant, OH

Emergency Classification Level or Event	Time Utility Declared	OH-EOC-ER	OH-EOC-AR	OH-Lakeland CC-JIC	LAK-EOC	ASH-EOC	GEA-EOC
Unusual Event	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Alert	0744	0749	0744	0950	0755	0755	0755
Site Area Emergency	0924	0932	0931	0950	0932	0932	0932
General Emergency	1148	1158	1158	1158	1158	1158	1158
Simulated Rad. Release Started	1031	N/A	N/A	N/A	N/A	N/A	N/A
Simulated Rad. Release Terminated	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Simulated Major Release of Radioactive Material Started		N/A	1140	N/A	N/A	N/A	N/A
Facility Declared Operational		0918	0918	1100	0925	0832	0832
Declaration of Local Emergency		N/A	N/A	N/A	0940	0940	0940
Declaration of State of Emergency		1000	N/A	N/A	N/A	N/A	N/A
Exercise Terminated		1415	1415	1429	1400	1400	1400
General Informational Message		0907	N/A	N/A	0907	0907	0907
Early Precautionary Actions: Livestock Sheltered & Placed on Stored Feed		0932	N/A	1016	N/A	N/A	N/A
Early Precautionary Action Decision: Relocation of School Children		N/A	N/A	1016	0935	0935	0935
Early Precautionary Action Decision: Restriction of Air, Water, Rail and Parks Closed		0944	N/A	N/A	N/A	N/A	N/A
Protective Action Recommendation: Evacuate Sub-Areas 1, 2, 4 & Lake Erie and KI Administration		1212	N/A	N/A	N/A	N/A	N/A
1st Protective Action Decision: Evacuate Sub-Areas 1, 2, 4 & Lake Erie and KI Administration		N/A	N/A	1209	1207	1207	1207
1st Siren Activation		N/A	N/A	N/A	1215	N/A	N/A
1st EAS or EBS Message		N/A	N/A	N/A	1223	N/A	N/A
Special Informational Bulletin: Curtail Water Usage		N/A	N/A	N/A	1232	1232	1232
Protective Action Recommendation: Evacuate Sub-Areas 1, 2, 4, 5 & Lake Erie and KI Administration		N/A	1314	N/A	N/A	N/A	N/A
2nd Protective Action Decision: Evacuate Sub-Areas 1, 2, 4, 5 & Lake Erie and KI Administration		N/A	N/A	1330	1323	1323	1323
2nd Siren Activation		N/A	N/A	N/A	1330	N/A	N/A
2nd EAS or EBS Message		N/A	N/A	N/A	1333	N/A	N/A

APPENDIX C: EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel that evaluated the Perry Nuclear Power Plant REP Partial Participation Plume Exposure Pathway Exercise on September 28, 2010. The list includes the evaluation team leadership and all evaluators. The organization each evaluator represents is indicated by the following abbreviations:

DHS/FEMA - Department of Homeland Security/Federal Emergency Management Agency
ICF - ICF Consulting

Title, Name, Organization

Radiological Assistance Committee, Chairman - William E. King - DHS/FEMA

Exercise Director - Gary L. Naskrent - DHS/FEMA

Assistant Exercise Director - Dwaine Warren - DHS/FEMA

Site Specialist - Bridget Ahlgrim - DHS/FEMA

Team Leader – State of Ohio - Carolyn Sturghill - DHS/FEMA

Team Leader – Lake County - Bridget Ahlgrim - DHS/FEMA

Team Leader – Ashtabula County - Edward Diaz - DHS/FEMA

Team Leader – Geauga County - James King - DHS/FEMA

DATE: 2010-09-28, SITE: Perry Nuclear Power Plant, OH

LOCATION	EVALUATOR	AGENCY
State of Ohio - Initial Notification Point	Frank Cordaro	ICF
State of Ohio - Emergency Operations Center - Executive Room	Frank Cordaro Onalee Grady-Erickson	ICF ICF
State of Ohio - Emergency Operations Center - Assessment Room	Onalee Grady-Erickson Reggie Rodgers	ICF ICF
State of Ohio - Emergency Operations Center - Joint Information Center	Frank Cordaro	ICF
State of Ohio - Lakeland Community College - Joint Information Center	Henry Christiansen	ICF
State of Ohio - Emergency Operations Facility	Jon Christiansen	ICF
State of Ohio - Lake County Emergency Operations Center - State Radiological Analyst	Raymond Wood	ICF
State of Ohio - Department of Natural Resources - Route Alerting	Michael Meshenberg	ICF
Lake County - Initial Notification Point	Clinton Crackel	DHS/FEMA
Lake County - Emergency Operations Center	Kerris Bates Clinton Crackel Richard Grundstrom Raymond Wood	DHS/FEMA DHS/FEMA ICF ICF
Lake County - Field Monitoring Team Coordinator	*Bridget Ahlgrim Raymond Wood	DHS/FEMA ICF
Lake County - Lakeland Community College - Joint Information Center	George R MacDonald	ICF
Lake County - Field Monitoring Team #1	Gary Snodgrass	ICF
Lake County - Field Monitoring Team #2	Paul Cormier	ICF
Lake County - Leroy Fire Department - Backup Route Alerting	Wendy Swygert	ICF
Lake County - Fairport Harbor School District - Evacuation School	David Petta	ICF
Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Registration	Raymond Wood	ICF
Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Monitoring	Raymond Wood	ICF
Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Decontamination	Robert Jeffries	ICF
Lake County - Kirtland High School - Kirtland Fire Department - Evacuee Monitoring and Decontamination of Vehicles	Jon Christiansen	ICF
Lake County - Kirtland High School - Congregate Care Center	Deborah Fulk	DHS/FEMA
Lake County - Madison Fire District - Medical Service - Transportation	Todd Sniffin	ICF
Lake County - Tri-Point Medical Center - Medical Service - Facility	Clayton Spangenberg	ICF
Lake County - Madison Local - Evacuation School	Bruce Swiren	ICF
Lake County - Perry Village Police Department - Traffic Control Point/Access Control Point - Briefing	Clayton Spangenberg	ICF
Lake County - Perry Village Police Department - Traffic Control Point/Access Control Point - Interview	Henry Christiansen	ICF
Lake County - Grand River Police Department - Traffic Control Point/Access Control Point - Briefing	Todd Sniffin	ICF
Lake County - Grand River Police Department - Traffic Control Point/Access Control Point - Interview	Wendy Swygert	ICF
Ashtabula County - Initial Notification Point	Richard McPeak	ICF

Ashtabula County - Emergency Operations Center	James Groves Mike Howe Debra Schneck	ICF DHS/FEMA HQ ICF
Ashtabula County - Lakeland Community College - Joint Information Center	George R MacDonald	ICF
Ashtabula County - Saybrook Fire Department - Emergency Worker Monitoring and Decontamination of Equipment and Vehicles	Bruce Swiren	ICF
Ashtabula County - Saybrook Fire Department - Emergency Worker Monitoring and Decontamination	Kerris Bates	DHS/FEMA
Ashtabula County - Northwest Ambulance District - Medical Service - Transportation	Richard McPeak	ICF
Ashtabula County - Geneva Police Department - Traffic Control Point/Access Control Point - Briefing	David Petta	ICF
Ashtabula County - Geneva Police Department - Traffic Control Point/Access Control Point - Interview	Gary Snodgrass	ICF
Ashtabula County - Harpersfield Volunteer Fire Department - Backup Route Alerting - Briefing	Debra Schneck	ICF
Geauga County - Initial Notification Point	Carl Bebrich	DHS/FEMA
Geauga County - Emergency Operations Center	Carl Bebrich William O'Brien	DHS/FEMA ICF
Geauga County - Emergency Operations Center - Sheriffs Road Patrol & Dosimetry Coordinator - Traffic and Access Control Briefing Including DCO Briefing	Deborah Fulk	DHS/FEMA
Geauga County - Lakeland Community College - Joint Information Center	George R MacDonald	ICF
Geauga County - Thompson Volunteer Fire Department - Route Alerting	Robert Jeffries	ICF
Geauga County - Ledgemont School District - Evacuation School	James Groves	ICF
* Team Leader		

APPENDIX D: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AC	Ashtabula County
ACP	Access Control Points
ARC	American Red Cross
ARCA	Area Requiring Corrective Action
BSI	Body Substance Isolation
CAD	Computer Automated Dispatch
CAS	Crisis Action System
CC	Care Center
CE	County Engineer
CPM	Counts Per Minute
DC	Dosimetry Coordinator
DCO	Dosimetry Control Officer
DHS	Department of Homeland Security
DRF	Dosimetry Report Form
DTL	Dedicated Telephone Line
EAL	Emergency Action Level
EAS	Emergency Alert System
ECL	Emergency Classification Level
ED	Executive Director
EDL	Executive Decision Line
EMA	Emergency Management Agency
EMAD	Emergency Management Agency Director
EMD	Emergency Management Director
EMS	Emergency Medical Services
EMT	Emergency Medical Technician
EOC	Emergency Operations Center
EOF	Emergency Offsite Facility
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EPI	Emergency Public Information
EPZ	Emergency Planning Zone
ER	Emergency Room
ERDS	Emergency Response Data System
ES	Elementary School

EW	Emergency Workers
FEMA	Federal Emergency Management Agency
FH	Fairport Harbor
FHSD	Fairport Harbor School District
FMTC	Field Monitoring Team Coordinator
GE	General Emergency
GIS	Geospatial Information Service
GPD	Geneva Police Department
GPS	Global Positioning System
HFD	Harpersfield Fire Department
HS	High School
HSAS	Homeland Security Advisory System
IC	Incident Commander
INM	Initial Notification Message
INP	Initial Notification Point
IWP	Initial Warning Point
JIC	Joint Information Center
KSD	Kirtland School District
LC	Lake County
LCEMAD	Lake County Emergency Management Agency Director
LCEOC	Lake County Emergency Operations Center
LCES	Lake County Educational Services
LEADS	Law Enforcement Automated Data System
LEC	Law Enforcement Coordinator
LRDM	Locker Room Decontamination Monitor
MARCS	Multi Agency Radio Communications System
MDT	Mobile Data Terminal
MPA	Metro Parks Authority
NAD	Northwest Ambulance District
NDCL	Notre Dame Cathedral Latin
NDS	Nuclear Data System
NRC	Nuclear Regulatory Commission
NRF	National Response Framework
NWS	National Weather Service
OEMA	Ohio Emergency Management Agency
OEPA	Ohio Environmental Protection Agency
ORO	Off-site Response Organizations
OSHP	Ohio State Highway Patrol
OSL	Optically Stimulated Luminescence
OSLD	Optically Stimulated Luminescence Dosimeter

PAD	Protective Action Decision
PAG	Protective Action Guidelines
PAR	Protective Action Recommendations
PD	Police Department
PIO	Public Information Officer
PNPP	Perry Nuclear Power Plant
PR	Press Releases
PRD	Permanent Record Dosimeter
PSAP	Public Safety Answering Point
PVPD	Perry Village Police Department
RAC	Regional Assistance Committee
RACES	Radio Amateur Civil Emergency Services
RCS	Reception Center Staff
REA	Radiological Exclusion Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
RN	Registered Nurse
RO	Radiological Officer
RRA	Resident Radiological Analyst
SAE	Site Area Emergency
SIB	Special Information Bulletins
SNB	Special News Bulletins
SO	Sheriff's Office
SOG	Suggested Operating Guideline
SOP	Standard Operating Procedure
SRD	Self Reading Dosimeters
SSR	Schools Services Representative
SUV	Sport Utility Vehicles
TACP	Traffic Access Control Point
TBHBV	Turbine Building Heater Bay Vent
TCP	Traffic Control Points
TEDE	Total Effective Dose Equivalent
TL	Team Leader
TS	Transportation Supervisor
TSA	Transportation Staging Area
TSC	Technical Support Center
UE	Unusual Event
VHF	Very High Frequency

APPENDIX E: EXERCISE PLAN

This appendix lists the exercise criteria that were scheduled for demonstration in the Perry Nuclear Power Plant REP Partial Participation Plume Exposure Pathway Exercise on September 28, 2010, and the offsite extent-of-play agreement approved by DHS/FEMA on September 2, 2010.

This exercise criteria, contained in FEMA Radiological Emergency Preparedness Exercise Evaluation Methodology, as published in the Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002, represent a functional translation of the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", November 1980.

Because the exercise criteria are intended for use at all nuclear power plant sites, and because of variations among offsite plans and procedures, an extent-of-play agreement is prepared by the State and approved by DHS/FEMA to provide evaluators with guidance on expected actual demonstration criteria.

Listed below are the specific REP criteria scheduled for demonstration during this exercise.

PERRY NUCLEAR POWER PLANT

PARTIAL PARTICIPATION EXERCISE

EXTENT OF PLAY AGREEMENT

State of Ohio

08/12/2010

SEPTEMBER 28, 2010

Criteria that can be re-demonstrated immediately for credit, at the decision of the evaluator, include the following: 3.a.1, 3.d.1, 3.d.2, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Extent of Play

The State Emergency Operations Center (SEOC) and the Ohio Highway Patrol Dispatch Center will receive initial notification over the 24-hour phone line. Once the SEOC Assessment Room is activated all dedicated phone communications will be received there. The State will mobilize all the agencies that have responsibilities in the SEOC, including the Executive Room, Dose Assessment, State Joint Information Center (JIC); the county EOC's; and the PNPP JIC (Lakeland Community College) and Emergency Operations Facility (EOF). The state representatives assigned to the PNPP JIC and EOF, and the county EOC's will be pre-positioned within approximately 20 minutes after the declaration of the Alert.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

Extent of Play

The baseline exercise for demonstration of this criterion was conducted in April 2002.

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.

Extent of Play

Direction and control of state activities will be demonstrated at the SEOC. The Executive Director of Ohio EMA will be positioned in the SEOC Executive Room and will coordinate decisions on behalf of the Governor's office. The Ohio Department of Health is responsible for determining the State PAR in the SEOC Assessment Room and will provide periodic briefings to the SEOC Executive Room.

Criterion 1.d.1: At least two communication systems are available and operate properly and communication links are established and maintained with appropriate locations. Communication capabilities are managed in support of emergency operations.

Extent of Play

The primary means of communications between the State EOC and the County EOCs, PNPP JIC and EOF is by commercial and/or dedicated telephone. Backup communications (radio and/or cellular phones) will be demonstrated.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Extent of Play

The state will demonstrate the use of equipment, maps and displays to support emergency operations. The maps traditionally used in the EOC will be available and used for exercise evaluation purposes.

EVALUATION AREA 2 – PROTECTIVE ACTION DECISION MAKING

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.

Extent of Play

The SEOC Assessment Room staff will consider PAGs and Administrative Limits to develop recommendations, including KI, based on their technical evaluation of the available data. Recommendations will be forwarded to the SEOC Executive group and subsequently to the Lake, Ashtabula and Geauga County EOC's. County EOC's will disseminate recommendations to their emergency workers. Field monitoring data will be provided to the SEOC Assessment Room via controller injects.

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.

Extent of Play

The SEOC Assessment Room will evaluate the licensee information and complete independent dose projections based on that information and controller injected (simulated) field-monitoring data. Assessment Room staff will evaluate the data and forward protective action recommendations to the SEOC Executive Room. Approved recommendations will then be forwarded to the Lake, Ashtabula, and

Geauga County EOCs via a dedicated conference line established in the Assessment Room.

This is a re-demonstration to clear the ARCA incurred during the April 20, 2010 Beaver Valley Power Station exercise.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Governor or his designee will demonstrate the ability to make appropriate protective action recommendations based on technical information from the SEOC Assessment Room. Recommendations concerning the use of KI for the general public and emergency workers and institutionalized are the responsibility of the Ohio Department of Health. They are made in the SEOC Assessment Room in compliance with the ODH KI policy and will accompany the protective action recommendation.

Coordination will take place in the SEOC Executive Room with Lake, Ashtabula and Geauga Counties to ensure consideration of local needs. After the decision is made, counties will disseminate protective actions to the general public.

At least two (2) Protective Action Decisions will be demonstrated.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups.

Extent of Play

The recommendation to take KI is developed by the Ohio Department of Health in the SEOC Assessment Room and accompanies the PAR. Upon approval in the SEOC Executive Room, it is then forwarded by the SEOC Assessment to Lake, Ashtabula and Geauga Counties for implementation.

See Lake, Ashtabula and Geauga Extent-of Play Agreements.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

Criterion 2.e.1: Timely re-location, re-entry 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.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

EVALUATION AREA 3 – PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures and manage radiological exposure to emergency workers in accordance with the plan 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.

Extent of Play

The State Field Monitoring Teams (FMT's), Communication Van and Sample Screening Point will not be demonstrated this exercise. The State demonstrated this criterion at the Beaver Valley Power Station 2010 exercise. It will be demonstrated again at the April 2012 Perry Nuclear Power Plant exercise. Implementation will be demonstrated by county responders.

Implementation will be demonstrated for State personnel responding to the EOF.

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 (not the general public) is maintained.

Extent of Play

The State Field Monitoring Teams (FMT's), Communication Van and Sample Screening Point will not be demonstrated this exercise. The State demonstrated this criterion at the April 2010 Beaver Valley Power Station exercise. It will be demonstrated again at the April 2012 Perry Nuclear Power Plant exercise. Implementation will be demonstrated by county responders.

Implementation will be demonstrated for State personnel responding to the EOF.

No KI will be ingested.

Criterion 3.c.1: Protective action decisions are implemented for special population groups within areas subject to protective actions.

Extent of Play

N/A - This is a county function.

Criterion 3.c.2: OROs/school officials decide upon and implement protective actions for schools.

Extent of Play

N/A - This is a county function.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Extent of Play

The SEOC Dose Assessment Room in coordination with the SEOC Executive group will procedurally demonstrate restricting air, water and rail traffic within the Emergency Planning Zone.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

Extent of Play

N/A - This is a county function.

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.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

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.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

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.

Extent of Play

The State Field Monitoring Teams (FMT's), Communication Van and Sample Screening Point will not be demonstrated this exercise. The State demonstrated this criterion at the April 2010 Beaver Valley Power Station exercise. It will be demonstrated again at the April 2012 Perry Nuclear Power Plant exercise.

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

Extent of Play

The State Field Monitoring Teams (FMT's), Communication Van and Sample Screening Point will not be demonstrated this exercise. The State demonstrated this criterion at the April 2010 Beaver Valley Power Station exercise. It will be demonstrated again at the April 2012 Perry Nuclear Power Plant exercise.

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.

Extent of Play

The State Field Monitoring Teams (FMT's), Communication Van and Sample Screening Point will not be demonstrated this exercise. The State demonstrated this criterion at the April 2010 Beaver Valley Power Station exercise. It will be demonstrated again at the April 2012 Perry Nuclear Power Plant exercise.

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.

Extent of Play

The State demonstrated this criterion at the June 2006 BVPS exercise. It will be demonstrated again at the June 2012 PNPP exercise.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

Extent of Play

The State demonstrated this criterion at the October 2006 PNPP exercise. It will be demonstrated again at the June 2012 PNPP exercise.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include:

1. Identification of the state or local government organization and the official with the authority for providing the alert signal and instructional message
2. Identification of the commercial nuclear power plant and a statement that an emergency situation exists at the plant
3. Reference to REP-specific emergency information (e.g., brochures and information in telephone books) for use by the general public during an emergency
4. A closing statement asking the affected and potentially affected population to stay tuned for additional information.

Extent of Play

The State will consult with the county EOCs in the Executive Room to determine the best immediate protective action for the populace. Once a decision is reached that requires the activation of the alert and notification system, Lake County in coordination with Ashtabula and Geauga counties will simulate the activation of the sirens and providing EAS messages to the EAS Station. (See the Lake, Ashtabula, and Geauga counties Extent of Play Agreements for further details.)

The State also notifies the public on Lake Erie (within the 10-mile EPZ) through the US Coast Guard as supported by Ohio Department of Natural Resources (ODNR).

An interview will be conducted with ODNR at 10:00 am on Wednesday, September 29 at the Ashtabula Division of Watercraft offices in Ashtabula, Ohio.

Criterion 5.a.2: [RESERVED]

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.

Extent of Play

N/A - This is a county function.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

Extent of Play

The State PIO and a representative from the Ohio Department of Health will be present at the PNPP JIC to address protective actions being implemented and the activities taking place at the State and county level. Public information representatives from Ohio EMA will be present in the SEOC (JIC) to communicate with the PNPP JIC.

A Public Inquiry telephone will be established and demonstrated at the SEOC JIC and driven by controller injects. Public Inquiry will address at least 3 calls per hour once Site Area Emergency is declared for two (2) hours. Trends in rumors will be identified and responded to as needed.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

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.

Extent of Play

N/A - This is a county function.

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.

Extent of Play

N/A - This is a county function.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

Extent of Play

N/A - This is a county function.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

N/A - This is a county function.

STATE OF OHIO

INITIAL NOTIFICATION POINT

Address: Ohio Emergency Management Agency (OHP Dispatch)
2855 W Dublin-Granville Rd
Columbus OH 43235-2206
Contact: Carol O'Claire
Telephone: (614) 799-3915
Date: Tuesday, 9/28/2010
Time: Start of exercise.

STATE EMERGENCY OPERATIONS CENTER

Address: Ohio Emergency Management Agency
2855 W Dublin-Granville Rd
Columbus OH 43235-2206
Contact: Carol O'Claire
Telephone: (614) 799-3915
Date: Tuesday, 9/28/2010
Time: Start of exercise.

STATE ASSESSMENT ROOM

Address: Ohio Emergency Management Agency
2855 W Dublin-Granville Rd
Columbus OH 43235-2206
Contact: Carol O'Claire
Telephone: (614) 799-3915
Date: Tuesday, 9/28/2010
Time: Start of exercise.

PNPP Joint Information Center

Address: Lakeland Community College
Performing Arts Center
7700 Clocktower Drive
Mentor, OH
Contact: Tamara McBride
Telephone: (614) 799-3695 (office); (440)269-7107 or (440)269-7122
Date: Tuesday, 9/28/2010
Time: 30 to 45 minutes after ALERT.

EMERGENCY OPERATIONS FACILITY (EOF)

Address: Perry Nuclear Power Plant
10 Center Road
Perry OH

Contact: Brian Martin
Telephone: (419)734-5433 (office); (440)280-5483 or 5746 (EOF)
Date: Tuesday, 9/28/2010
Time: 30 to 45 minutes after ALERT

ODNR INTERVIEW

Address: Ashtabula Div. of Watercraft
1 Front Street
Ashtabula, Ohio 44004
Contact: Scott Stauffer
Telephone: 440-964-0518
Date: Wednesday, 9/29/2010
Time: 10:00 am

STATE OF OHIO

Demonstrating Agency/ Exercise Controller/ Location	Date/ Time
Initial Notification Point Ohio Emergency Management Agency 2855 Dublin Granville Road Columbus, OH Contact: Carol O'Claire (614) 799-3915	09/28/10 0800 hours

Directions: The State EOC is located on State Route-161, (2855 W. Dublin Granville Road), between Sawmill Road and SR-315. Roadway entrance is to the south side of SR-161 (at the ODOT and Med-Flight signs). Stay straight on roadway to the second driveway and park. The EOC building entrance is at the top of the stairway. Upon entry, request that the guard notify your contact.

State Emergency Operations Center Ohio Emergency Management Agency 2855 Dublin Granville Road Columbus, OH Contact: Carol O'Claire (614) 799-3915	09/28/10 0800 - 1400 hours
State Assessment Room Ohio Emergency Management Agency 2855 Dublin-Granville Road Columbus OH Contact: Carol O'Claire (614) 799-3915	09/28/10 0800 - 1400 hours
Emergency Operations Facility (EOF) Perry Nuclear Power Plant 10 North Center Road Perry, OH	09/28/10 ~0930 hours

STATE OF OHIO (continued)

Demonstrating Agency/ Location	Date/ Time	Exercise Controller/ [Exercise Evaluator]

Contact: Brian Martin, State of Ohio EOF Liaison
(440) 280-5746

Directions: The EOF is located at the Perry Nuclear Power Plant (10 North Center Road) on the first floor of the Training and Education Center (TEC Building) which is the two-story, brick and cement building off to the left of the road upon entering the PNPP grounds. Take Rt. 2 to the end and continue straight ahead on U.S. Rt. 20 to Center Road. Turn left (north) on Center Road and enter PNPP. The TEC is the first drive on the left.

Joint Information Center 09/28/10
Lakeland Community College ~0930 Hours
Performing Arts Center
7700 Clocktower Drive
Mentor, OH

Contact: State of Ohio Public Information Officer (PIO)
(440) 269-7107 or (440) 269-7122/7115/7116

Directions: The main entrance (Clocktower Drive) is from Rt. 308, just south of Interstate 90. (Also, there is a back entrance from Garfield Road not far from the Lake County EOC.) The Performing Arts Center is to the immediate left of the clock tower. Enter the doors directly under the overhead walkway. If the security personnel will not admit you, ask for an Exercise Controller or the Government Liaison person.

Parking: Secured parking is available in the lot directly across from the clock. The parking code to enter will be given at the pre-exercise briefing.

Lake Erie Alert and Notification 9/29/10
Ashtabula Div. of Watercraft 1000 Hours
1 Front Street
Ashtabula, Ohio 44004

Contact: Scott Stauffer
440-964-0518

LAKE COUNTY
OHIO

Extent-of-Play Agreement

For the
Perry Nuclear Power Plant
Evaluated Exercise

Week of

September 27, 2010

The exercise will take place on September 28, 2010.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1, 3.d.1, 3.d.2, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Preparedness Coordinating Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Extent of Play

Lake County EOC Staff will mobilize upon notification from the Lake County Sheriff's Central Communications Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field agency demonstrations will be conducted out-of-sequence and participants will be pre-positioned.

Field activity participants

Leroy Fire Department – Back-up Route Alerting
Kirtland Fire Department – Public Monitoring & Decontamination at Kirtland High School Care Center
Madison School District – Risk School
Fairport Harbor School District – Risk School
American Red Cross – Evacuee registration & congregate care
Lake County General Health District – KI for the general public
TriPoint Medical Center - Medical Services (MS-1)
Perry Village Police Department – Traffic/Access Control
Grand River Police Department – Traffic/Access Control
Madison Fire District – MS-1 Transportation
Laketran – Transportation for Fairport Harbor School District

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

Extent of Play

N/A - The EOC and JIC have both been evaluated; no changes have been made.

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Lake County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of-sequence field demonstrations.

Criterion 1.d.1: At least two communication systems are available and operate properly and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/pagers/cell phones) means of communications will be demonstrated at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up in 2010, there is a quantity stockpiled at the EOC that would be transported to the care centers and distributed by the local health department, as requested.

EVALUATION AREA 2 – PROTECTIVE ACTION DECISION MAKING

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.

Extent of Play

Lake County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limits.

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.

Extent of Play

N/A – Lake County does not demonstrate this criterion; it relies on the State of Ohio.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Lake County EOC Executive Group will demonstrate this criterion in coordination with Geauga and Ashtabula counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at care centers.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups.

Extent of Play

The Lake County EOC Executive Group will demonstrate this criterion in coordination with Geauga and Ashtabula counties' Executive Groups. Typically, schools relocate at Site Area Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

Extent of Play

N/A – Lake County relies on the State of Ohio.

Criterion 2.e.1: Timely re-location, re-entry 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.

Extent of Play

N/A – This Criterion was successfully demonstrated in 2008.

EVALUATION AREA 3 – PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures and manage radiological exposure to emergency workers in accordance with the plan 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.

Extent of Play

The Lake County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by field agencies during out-of-sequence exercise activities.

Field activity participants:

Dosimetry briefing:
Leroy Fire Department – Back-Up Route Alerting
Kirtland Fire Department – Public Monitoring/Decontamination at care center

Grand River Police Department – Traffic/Access Control at department
Perry Village Police Department – Traffic/Access Control at department
Madison Fire District – MS-1 Transportation
Madison School District – Interview of Transportation Supervisor & bus operator only
TriPoint Medical Center – MS-1
Laketran (provides transportation for Fairport Harbor School District) – Interview of Transportation Supervisor & bus operator only

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 (not the general public) is maintained.

Extent of Play

The Ohio Department of Health (ODH) will make recommendations regarding the use of KI. Lake County's preparedness measures for KI include pre-distribution to emergency response agencies and to the general public, if they chose to pick it up at designated centers. At the time of the emergency, the agencies distribute the dosimetry and KI to the emergency workers. Demonstration of this criterion may be facilitated by discussion with the Lake County General Health District Coordinator at the EOC. For field agency demonstrations, KI procedures will be demonstrated by interview with exercise participants or by controller inject, if necessary.

Dosimetry and KI have been pre-distributed to Offsite Response Organizations (OROs); the monitoring kits and dosimetry are exchanged annually by the State of Ohio. Supporting documentation is included in the Annual Letter of Certification.

Extent of Play

Interview the EOC Lake County General Health District (LCGHD) representative during the exercise regarding the distribution of KI for the public at the care center.

Criterion 3.c.1: Protective action decisions are implemented for special population groups within areas subject to protective actions.

Extent of Play

Notification to individuals with special needs within the Lake County portion of the EPZ will be simulated. A list of special needs residents within the Lake

County portion of the EPZ is maintained by the Lake County Department of Job and Family Services and the Lake County EMA.

The Department of Job and Family Services Coordinator at the EOC will coordinate special needs notification activities and, upon request, will present the confidential list for review by the FEMA evaluator. At least 4 transportation providers, which in Lake County include school districts, will be contacted to ensure availability of buses and drivers.

Criterion 3.c.2: OROs/school officials decide upon and implement protective actions for schools.

Extent of Play

The school districts will demonstrate this criterion out-of-sequence, by interview with the superintendent, high school principal, transportation supervisor and a bus operator. School officials follow the protective action decisions made by the elected officials for the general public, if the school districts' superintendents have not made the decision to relocate prior to a General Emergency.

The use of dosimetry and KI will be discussed with transportation personnel only. If the school district has elected to have KI available for students, it is an internal policy and will be discussed during the interview.

During the Exercise all schools in the EPZ will be notified as identified in Criterion 1.a.1, Extent of Play. The EOC County School Services Representative will follow their Suggested Operating Guideline (SOG) during the Exercise.

There will be no movement of buses or students.

Field agency participants

Fairport Harbor School District
Madison School District
Laketran – provides transportation for Fairport Harbor School District

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Extent of Play

A representative of the police departments listed will demonstrate Traffic and Access Control out-of-sequence, by interview at their respective stations.

Notification of rail, water and air traffic is a State function.

Field activity participants:

Perry Village Police Department
Grand River Police Department

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

Extent of Play

Lake County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision to reroute traffic will be discussed and implemented by the appropriate EOC Staff.

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.

Extent of Play

N/A – Lake County relies on the State of Ohio.

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.

Extent of Play

N/A – Lake County relies on the State of Ohio.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

Extent of Play

N/A – This Criterion was successfully demonstrated in 2008.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

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.

Extent of Play

Lake County General Health District will demonstrate the use of two Field Monitoring Teams (FMTs), in sequence.

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

Extent of Play

Lake County Health District will demonstrate the use of two Field Monitoring Teams (FMTs), in sequence.

Lake County FMT data is utilized for validation purposes and is not used to generate PARs.

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.

Extent of Play

For the exercise, expired silver zeolite cartridges will be used; new cartridges will be available for the FEMA evaluator's observation.

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.

Extent of Play

N/A - Lake County relies on the State of Ohio

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

Extent of Play

N/A - Lake County relies on the State of Ohio

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include:

1. Identification of the state or local government organization and the official with the authority for providing the alert signal and instructional message
2. Identification of the commercial nuclear power plant and a statement that an emergency situation exists at the plant
3. Reference to REP-specific emergency information (e.g., brochures and information in telephone books) for use by the general public during an emergency
4. A closing statement asking the affected and potentially affected population to stay tuned for additional information.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Geauga and Lake counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. A quiet siren test will be demonstrated by the Lake County EOC in lieu of an actual siren sounding.

Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The "send" button on the Lake County EAS encoder will be depressed and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could perform this function, if necessary.

Lake County will fax a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message. In delivering information about the EAS message just released, the counties' PIOs may indicate that a corresponding Special News Bulletin (SNB) will be issued soon. Lake County will also fax a copy of the EAS message to Ashtabula and Geauga counties' EOCs.

Criterion 5.a.2: (RESERVED)

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.

Extent of Play

The Leroy Fire Department will demonstrate back-up route alerting as an out-of-sequence, prepositioned field activity. One predetermined siren located in Leroy will be out of service (simulated) and back-up route alerting will be conducted in the siren coverage area. Use of the mobile PA system will be simulated during the demonstration; an audible PA test will be conducted prior to departure. The demonstration will be initiated by the exercise controller.

Field Activity Participants

Leroy Fire Department

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake Counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail. Lake County will FAX the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the

three counties by directly proceeding to the briefing room and reading the contents of the message to the assembly of news media representatives and answering any questions pertaining to the message. This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Lake and Geauga counties will also coordinate release of other informational and instructional message as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least one trend will be demonstrated.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

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.

Extent of Play

Kirtland Fire Department will demonstrate the evacuee portion of this criterion out-of-sequence at Kirtland High School. One locker room will be fully set up and demonstrated; a walk-through of the remaining locker room will be conducted upon request.

Six (6) monitoring demonstrations will be conducted using a portal monitor. One individual with simulated contamination will be walked through the monitoring/decontamination process, which includes whole body monitoring using a survey meter; contamination levels will be provided by a controller. Decontamination will be simulated.

Monitoring and decontamination of evacuees' vehicles will be conducted by interview only; no actual monitoring or decontamination will take place.

Field activity participants

Kirtland Fire Department – Public M/D
American Red Cross – Evacuee registration

Lake County General Health District – KI for the general public

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.

Extent of Play

N/A – Lake County will not demonstrate this criterion. Mentor Fire Department demonstrated the Lake County Emergency Worker Monitoring Decontamination Station during the 2006 Evaluated Exercise.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

Extent of Play

The American Red Cross will demonstrate the congregate care center portion of this criterion out-of-sequence at Kirtland High School. American Red Cross personnel will provide a walk-through of the facility and describe their capabilities. Set-up of care center equipment or supplies will be at the discretion of the American Red Cross.

One person will be processed through the Red Cross portion and a copy of the paperwork will be provided to the Evaluator.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

Madison Fire District will demonstrate this criterion in sequence with the on-site scenario. A simulated contaminated/injured victim from the Perry Power Plant will be transported to TriPoint Medical Center. No emergency lights and/or sirens will be used.

LAKE COUNTY

Demonstrating Agency/ Location	Date/ Time

School District
Fairport School District
Superintendent's Office
Board of Education
329 Vine Street
Fairport, OH

09/27/10
0930 hours

Contact: Dominic Paolo, Superintendent
(440) 354-5400

Directions: Take Rte 2 east to the OH-283/OH-535 exit; go toward Fairport Harbor. Merge onto Richmond Street; turn slight right onto OH-535/East St. Continue on East St to New 4th Street and turn left; turn right on Vine St.

NOTE: Laketran provides bus services for the Fairport School District and will provide a Transportation Supervisor and bus operator for the interview at the school.

Lake County Field Monitoring Teams
Lake County
Emergency Operations Center
8505 Garfield Road
Mentor, Ohio

09/28/10
1000 hours

Contact: Bert Mechenbier, Lake County General Health District FMT Coordinator
(440) 350-5486

Directions: Lake County EOC located at the end of Garfield Road. The EOC is accessible from (1) Rt. 84 (Mentor) or (2) Lakeland Community College Campus.

Note: The 2 Lake County Field Monitoring Teams will conduct their demonstration in sequence with the evaluated exercise on Tuesday, September 28, 2010, beginning from the Lake County EOC.

Back-Up Route Alerting
Leroy Fire Department
13028 Leroy Center Road
Leroy, OH
Contact: Chief Frank Huffman

(440) 254-4124

09/27/10
1900 hours

Demonstrating Agency/ Location cont'd	Date/ Time

Directions: Take I-90 east to Vrooman Road and turn right (south). Travel approximately 1 mile to Leroy Center Rd and turn left; the station is on the right.

Monitoring/Public 09/27/10
Kirtland High School 1900 hours
9150 Chillicothe Road
Kirtland, OH 44094

Demonstrating Agency: Kirtland Fire Department
Contact: Chief Tony Hutton
(440) 256-8979

Directions: Take Route 306 south from I-90, approximately 2 miles. Kirtland High School is on the right (west).

Congregate Care Center/Registration 09/27/10
Kirtland High School 1900 hours
9150 Chillicothe Road
Kirtland, OH 44094

Demonstrating Agency: American Red Cross
Contact: Michelene Holland
(216) 361-4505

Directions: See above

Initial Notification Point 09/28/10
Lake County ~0800 hours
Emergency Operations Center (EOC)
Central Communications Center
8505 Garfield Road
Mentor, OH

Contact: Larry Greene, Director
(440) 350-5499

Directions: The Central Communications Center is co-located with the Lake County EOC, which is located at the end of Garfield Road. The EOC is accessible from (1) Rt. 84 (Mentor) or (2) Lakeland Community College Campus

Emergency Operations Center 09/28/10
Lake County EOC ~0800 hours
8505 Garfield Road
Mentor, OH

Demonstrating Agency/ Location con'd	Date/ Time

Contact: Larry Greene, Director
(440) 350-5499

Directions: see above

Joint Information Center 09/28/10
Lakeland Community College ~930 hours
7700 Clocktower Drive
Mentor, OH

Contact: Byron Landolfi, Ashtabula County Public Information Officer (PIO)
(440) 269-7107 or (440) 269-7122/7115/7116

Medical Services - Transportation 09/28/10
Perry Nuclear Power Plant ~0730 hours
Unit #1, Controlled Access Area
10 North Center Road
Perry, OH

Demonstrating agency: Madison Fire District
33 Lake St. (Rt. 528)
Madison, OH 44057

Contact: Chief Eugene Lutz
(440) 428-1522

Directions and Notes: The Medical Services demonstration will be conducted in sequence with the evaluated exercise. Contact the Exercise Controller, who will be waiting outside the Primary Access Facility (PAF) at the Perry Power Plant. The Madison Fire District will respond to the Perry Nuclear Power Plant, enter through the PAF vehicle lock, and travel to the transfer point from the Radiological Restricted Area. Special access and dosimetry is required for all participants, including the FEMA Evaluator. An Exercise Controller will escort the FEMA Evaluator inside the plant's controlled area.

Medical Services – Facilities
TriPoint Medical Center 09/28/10
7590 Auburn Road 0830 hours
Concord, OH 44077

Contact: Pat Cassella
(440) 477-7628 (cell) or 216-634-4109 (pager)

Demonstrating Agency/ Location	Date/ Time

Directions: Take Rt. To Rt. 44 south to Auburn Road (approximately 1/8 mi. s of I-90) and turn right; TriPoint is approximately ¼ mile on the right.

Joint Information Center 09/28/10
Lakeland Community College ~ 1000 - 1500 hours
7700 Clocktower Drive
Mentor, OH
Contact: Chris Hodges, Lake County Public Information Officer (PIO)
(440) 269-7107 or (440) 269-7122/7115/7116

Directions: The main entrance (Clocktower Drive) is from Route 308, just south of Interstate 90. (Also, there is a back entrance from Garfield Road not far from the Lake County EOC.) The Performing Arts Center is to the immediate left of the clock tower. Enter the doors directly under the overhead walkway. If the security personnel will not admit you, ask for an Exercise Controller or the Government Liaison person.

Parking: Secured parking is available in the lot directly across from the clock. The parking code to enter will be given at the pre-exercise briefing. The gate lifts automatically when exiting. Parking is also available in the student parking lots

Traffic/Access Control 09/29/10
Perry Village Police Department 0900 hours
3758 Center Road
Perry, OH 44081
Contact: Chief Ed Matty
Phone: (440) 259-2671
Directions: Take Rt. 20 east to Center Road and turn right (south); the PD is on the right.

Traffic/Access Control 09/29/10
Grand River Police Department 0900 hours
205 Singer Avenue
Grand River, OH 44045
Contact: Chief Barry Dodd
Phone: (440) 352-1287

Directions: Take Rt. 44 north to Lake Shore Blvd. (Rt. 283) and turn right (east); (Lake Shore Blvd becomes Singer Avenue) and travel approximately 1 mile.

Demonstrating Agency/ Location	Date/ Time

School District

Madison School District 09/29/10
Superintendent's Office 0900 hours
Board of Education
6741 North Ridge Road
Madison, OH

Contact: Dr. Roger Goudy, Superintendent
(440) 428-2166

Directions: Take Rte. 20 east to just past Route 528. The Madison Board of Education is < 1/10 mi on the left (north) side.

ASHTABULA COUNTY
OHIO

Extent-of-Play Agreement

For the
Perry Nuclear Power Plant
Evaluated Exercise

Week of
September 27, 2010

The EOC portion of the exercise will take place on September 28, 2010.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1, 3.d.1, 3.d.2, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Preparedness Coordinating Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 5.a.1 and 5.b.1

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Extent of Play

Ashtabula County EOC Staff will mobilize upon notification from the Ashtabula County Sheriff's Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field agency demonstrations will be conducted out-of-sequence and participants will be pre-positioned.

Field activity participants

Harpersfield Volunteer Fire Department – Back-up Route Alerting
Geneva Police - Traffic/Access Control
Saybrook Township Fire Department – Emergency Worker Monitoring & Decontamination at Lakeside High School
Northwest Ambulance District (NAD) – MS-1 Transportation (at the Lakeside High School Emergency Worker Monitoring & Decontamination Station)

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

Extent of Play

N/A - The EOC and JIC have both been evaluated; no changes have been made.

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Ashtabula County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of-sequence field demonstrations.

Criterion 1.d.1: At least two communication systems are available and operate properly and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/pagers/cell phones) means of communications will be demonstrated at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up in 2010, there is a quantity stockpiled at both the EOC and the Health District that would be transported to the care centers and distributed by the local health department, as requested.

Evaluation Area 2 – Protective Action Decision Making

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.

Extent of Play

Ashtabula County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this

will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limits.

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.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion. It relies on the State of Ohio.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Ashtabula County EOC Executive Group will demonstrate this criterion in coordination with Lake and Geauga counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at care centers.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups.

Extent of Play

The Ashtabula County EOC Executive Group will demonstrate this criterion in coordination with Lake and Geauga counties' Executive Groups. Typically, schools relocate at Site Area Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

Criterion 2.e.1: Timely re-location, re-entry 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.

Extent of Play

N/A – This Criterion was successfully demonstrated in 2008.

Evaluation Area 3 – Protective Action Implementation

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures and manage radiological exposure to emergency workers in accordance with the plan 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.

Extent of Play

The Ashtabula County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by field agencies during out-of-sequence exercise activities.

Field activity participants:

Dosimetry briefing:

Harpersfield Volunteer Fire Department – Back-Up Route Alerting
Saybrook Township Fire Department – Emergency Worker Monitoring/Decontamination
Northwest Ambulance District – MS-1 Transportation

Interview & Dosimetry Briefing
Geneva Police Department – Traffic & Access Control

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 (not the general public) is maintained.

Extent of Play

The Ohio Department of Health (ODH) will make recommendations regarding the use of KI. Ashtabula County's preparedness measures for KI include pre-distribution to emergency response agencies and the general public, if they chose to pick it up. At the time of the emergency, the agencies distribute the dosimetry and KI to the emergency workers.

If the ODH recommendation for use of KI excludes the portion of the EPZ that is in Ashtabula County, demonstration of this criterion will be facilitated by discussion with the Ashtabula County Radiological Officer at the EOC. For field agency demonstrations, KI procedures will be demonstrated by interview with exercise participants or by controller inject, if necessary.

Dosimetry and KI have been pre-distributed to Offsite Response Organizations (OROs); the monitoring kits and dosimetry are exchanged annually by the State of Ohio. Supporting documentation is included in the Annual Letter of Certification.

Extent of Play

Interview the EOC Ashtabula County Health Department representative at the EOC during the exercise regarding the distribution of KI for the public at the care center.

Criterion 3.c.1: Protective action decisions are implemented for special population groups within areas subject to protective actions.

Extent of Play

Notification to individuals with special needs within the Ashtabula County portion of the EPZ will be simulated. The Ashtabula County EMA maintains a list of special needs organizations within the Ashtabula County portion of the EPZ. The EOC Job and Family Services Representative will coordinate special needs notification activities and, upon request, will present the list for review by the FEMA evaluator. At least 2 transportation providers, which in Ashtabula County are school districts, will be contacted to ensure availability of buses and drivers.

Criterion 3.c.2: OROs/school officials decide upon and implement protective actions for schools.

Extent of Play

The EOC County School Services Representative will follow their Suggested Operating Guideline (SOG) during the Exercise. Geneva School District, the only school district in the portion of the EPZ that is in Ashtabula County, successfully demonstrated this Criterion in 2008.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Extent of Play

A representative of the police department will demonstrate Traffic and Access Control out-of-sequence, by interview at the station.

Notification of rail, water and air traffic is a State function.

Field activity participants:

Geneva Police Department

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

Extent of Play

Ashtabula County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision process to re-route traffic will be discussed and implemented by the appropriate EOC Staff.

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.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

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.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

Extent of Play

N/A – This Criterion was successfully demonstrated in 2008.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

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.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

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.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

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.

Extent of Play

N/A - Ashtabula County does not demonstrate this criterion.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include:

1. Identification of the state or local government organization and the official with the authority for providing the alert signal and instructional message

2. Identification of the commercial nuclear power plant and a statement that an emergency situation exists at the plant

3. Reference to REP-specific emergency information (e.g., brochures and information in telephone books) for use by the general public during an emergency

4. A closing statement asking the affected and potentially affected population to stay tuned for additional information.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Lake and Geauga counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. A quiet siren test will be demonstrated by the Lake County EOC in lieu of an actual siren sounding.

No siren activation will be performed by Ashtabula County.

Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The "send" button on the Lake County EAS encoder will be depressed, and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could provide this function if necessary.

Lake County will fax a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message.

In delivering information about the EAS message just released, the counties' PIOs may indicate that a corresponding Special News Bulletin (SNB) will be issued soon. Lake County will also fax a copy of the EAS message to Ashtabula and Geauga counties' EOC's.

Criterion 5.a.2: (RESERVED)

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.

Extent of Play

Harpersfield Volunteer Fire Department will demonstrate back-up route alerting as an out-of-sequence, pre-positioned field activity. One pre-determined siren located in the fire department's jurisdiction will be out-of-service (simulated) and back-up route alerting will be conducted in the siren coverage area. Use of the mobile PA system will be simulated during the demonstration; an audible PA test will be conducted prior to departure. The demonstration will be initiated by the exercise controller.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake Counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail.

Lake County will FAX the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the three counties by directly proceeding to the briefing room and reading the contents of the message to the assembly of news media representatives and answering any questions pertaining to the message.

This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Geauga and Lake Counties will also coordinate release of other informational and instructional message, as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least one trend will be demonstrated.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

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.

Extent of Play

Saybrook Township Fire Department will demonstrate the emergency worker facility out-of-sequence at Lakeside High School, 6600 Sanborn Road, Saybrook Township. One locker room will be fully set up and demonstrated; a walk-through of the remaining locker room will be conducted upon request.

Two monitoring demonstrations will be conducted using a portal monitor. One individual with simulated contamination will be walked through the monitoring and decontamination process, which includes whole body monitoring using a survey meter; contamination levels will be provided by a controller. Decontamination will be simulated.

Field activity participants

Saybrook Township Fire Department – Emergency Worker M/D

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.

Extent of Play

The Saybrook Fire Department will demonstrate this criterion at Lakeside High School. One vehicle will be monitored and decontamination will be explained; no actual decontamination will take place.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

Extent of Play

The American Red Cross successfully demonstrated this Criterion at the Edgewood High School care center during the 2008 exercise and at the Conneaut Middle School care center during the 2006 exercise.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

Northwest Ambulance District – MS-1 Transportation at Lakeside High School
Emergency Worker Monitoring & Decontamination Station

ASHTABULA COUNTY

Demonstrating Agency/ Location	Date/ Time
Emergency Worker Monitoring/Decontamination Station Lakeside High School 6600 Sanborn Road Ashtabula, OH 44004 Saybrook Fire Department Contact: Chief John Jyurovat (440) 969-1179 Directions: Take I-90 east to Route 45 north. Travel approximately 3-4 miles to Route 84 and turn right; Lakeside High School is approximately 3 miles (just past Sanborn Road) on the left (north) side.	09/27/10 1900 hours
Medical Services – Transportation Lakeside High School 6600 Sanborn Road Ashtabula, OH 44004 Demonstrating agency: Northwest Ambulance District at Lakeside High School Contact: Vince Gildone (440) 466-4900 Directions and Notes: See above	09/28/10 1900 hours
Initial Notification Point Ashtabula County Sheriff's Department Dispatch Center 25 West Jefferson Street Jefferson, OH Contact: George Sabo, Director (440) 576-9148 Directions: Take Interstate 90 to State Route 45. Take State Route 45 south to State Route 307. Take State Route 307 east to State Route 46 (Chestnut Street). Take State Route 46 south (right) to the intersection with Jefferson Street. The Sheriff' Department is located with the county courthouse on the right. The Dispatch Center is located in the basement area adjacent to the County EOC.	09/28/10 ~ 0800 hours
Emergency Operations Center Ashtabula County Courthouse 25 West Jefferson Street Jefferson, OH	09/28/10 ~0800 hours

Demonstrating Agency/ Location cont'd	**Date/ Time**
Contact: George Sabo, Director (440) 576-9148 Directions: See above:	
Joint Information Center Lakeland Community College 7700 Clocktower Drive Mentor, OH Contact: Byron Landolfi, Ashtabula County Public Information Officer (PIO) (440) 269-7107 or (440) 269-7122/7115/7116	09/28/10 ~0930 hours
Traffic/Access Control Geneva Police Department 44 North Forest Street Geneva, OH 44041 Contact: Captain Greg Wiley (440) 466-1111 Directions: Travel east on I-90 to Rt. 534; turn left (north). Travel approximately 3 miles to Rt.20; turn right (east) on Rt. 20. Take first left (north) onto Forest St.; the PD is on the left side.	09/29/10 0900 hours
Back-Up Route Alerting Harpersfield Fire Department 5430 Cork Cold Springs Road Harpersfield, OH Contact: Chief Everett Henry (440) 466-3877 Directions: Travel east on Rt.90 to Rt. 534; exit and turn right (south). Travel approximately ¾ mi – 1 mile and turn right on Rt. 307. The station is about ½ mile on the south side.	09/29/10 1900 hours

GEAUGA COUNTY
OHIO

Extent-of-Play Agreement

For the
Perry Nuclear Power Plant
Evaluated Exercise

Week of

September 27, 2010

The EOC portion of the exercise will take place on September 28, 2010.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1, 3.d.1, 3.d.2, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Preparedness Coordinating Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Extent of Play

Geauga County EOC Staff will mobilize upon notification from the Geauga County Sheriff's Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field agency demonstrations will be conducted out-of-sequence and participants will be pre-positioned.

Field activity participants

Thompson Volunteer Fire Department – Back-Up Route Alerting
Ledgemont School District – Risk School
Traffic/Access Control by interview at the EOC during the Exercise

- Geauga County Sheriff's Office

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

Extent of Play

N/A - The EOC and JIC have both been evaluated; no changes have been made.

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Geauga County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of-sequence field demonstrations.

Criterion 1.d.1: At least two communication systems are available and operate properly and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/pagers/cell phones) means of communications will be demonstrated at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up in 2010, there is a quantity stockpiled at the Health District that would be transported to the care centers and distributed by the local health department, as requested.

EVALUATION AREA 2 – PROTECTIVE ACTION DECISION MAKING

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.

Extent of Play

Geauga County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limits.

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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion; it relies on the State of Ohio for field monitoring.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Geauga County EOC Executive Group will demonstrate this criterion in coordination with Lake and Ashtabula counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at care centers.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups.

Extent of Play

The Geauga County EOC Executive Group will demonstrate this criterion in coordination with Lake and Ashtabula counties' Executive Groups. Typically, schools relocate at Site Area Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

Criterion 2.e.1: Timely re-location, re-entry 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.

N/A – This Criterion was demonstrated in 2008.

EVALUATION AREA 3 – PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures and manage radiological exposure to emergency workers in accordance with the plan 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.

Extent of Play

The Geauga County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by field agencies during out-of-sequence exercise activities.

Field activity participants:
Thompson Volunteer Fire Department – Back-Up Route Alerting
Ledgemont School District – Risk School

Dosimetry briefing:
Thompson Volunteer Fire Department
Ledgemont School District – Interview of Transportation Supervisor & bus operator only

Interview & dosimetry briefing:
Geauga County Sheriff's Office – at the EOC during the Exercise

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 (not the general public) is maintained.

Extent of Play

The Ohio Department of Health (ODH) will make recommendations regarding the use of KI. Geauga County's preparedness measures for KI include pre-distribution to emergency response agencies and to the general public, if they chose to pick it up at designated centers. At the time of the emergency, the agencies distribute the dosimetry and KI to the emergency workers. If the ODH recommendation for use of KI excludes the portion of the EPZ that is in Geauga County, demonstration of this criterion may be facilitated by discussion with the Geauga County Radiological Officer at the EOC. For field agency demonstrations, KI procedures will be demonstrated by interview with exercise participants or by controller inject, if necessary.

Dosimetry and KI have been pre-distributed to Offsite Response Organizations (OROs); the monitoring kits and dosimetry are exchanged annually by the State of Ohio.

Supporting documentation is included in the Annual Letter of Certification.

Extent of Play

Interview the Geauga County Health District representative at the EOC during the exercise regarding the distribution of KI for the public at the care center.

Criterion 3.c.1: Protective action decisions are implemented for special population groups within areas subject to protective actions.

Extent of Play

Notification to individuals with special needs within the Geauga County portion of the EPZ will be simulated. A list of special needs residents within the Geauga County portion of the EPZ is maintained by the Geauga County Department of Emergency Services (DES). The Fire/EMS Coordinator at the EOC will coordinate special needs notification activities and, upon request, will present the confidential list for review by the FEMA evaluator. At least 2 transportation providers, which in Geauga County include school districts, will be contacted to ensure availability of buses and drivers.

Criterion 3.c.2: OROs/school officials decide upon and implement protective actions for schools.

Extent of Play

The school district will demonstrate this criterion out-of-sequence, by interview with the superintendent, high school principal, transportation supervisor and a bus operator. School officials follow the protective action decisions made by the elected officials for the general public.

The use of dosimetry and KI will be discussed with transportation personnel only. There will be no movement of buses or students.

The EOC County Schools Services Representative will follow their Suggested Operating Guideline (SOG) during the Exercise.

Field activity participants

Ledgemont School District

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Extent of Play

The EOC Geauga County Sheriff's Office will demonstrate Traffic and Access Control by interview at the Geauga County EOC during the exercise.

Notification of rail, water and air traffic is a State function.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

Extent of Play

Geauga County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision to reroute traffic will be discussed and implemented by the appropriate EOC staff.

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.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

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.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

Extent of Play

N/A – This Criterion was demonstrated in 2008.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include:

1. Identification of the state or local government organization and the official with the authority for providing the alert signal and instructional message
2. Identification of the commercial nuclear power plant and a statement that an emergency situation exists at the plant
3. Reference to REP-specific emergency information (e.g., brochures and information in telephone books) for use by the general public during an emergency
4. A closing statement asking the affected and potentially affected population to stay tuned for additional information.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Lake and Geauga counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. A quiet siren test will be demonstrated by the Lake County EOC in lieu of an actual siren sounding.

Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The "send" button on the Lake County EAS encoder will be depressed, and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could perform this function, if necessary.

Lake County will fax a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message. In delivering information about the EAS message just released, the counties' PIOs may indicate that a corresponding Special News Bulletin (SNB) will be issued soon. Lake County will also fax a copy of the EAS message to Ashtabula and Geauga counties' EOCs.

Criterion 5.a.2: (RESERVED)

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.

Extent of Play

Thompson Volunteer Fire Department, the only Geauga County department with this responsibility, will demonstrate back-up route alerting as an out-of-sequence, pre-positioned field activity. One pre-determined siren located in the fire department's jurisdiction will be out-of-service (simulated) and back-up route alerting will be conducted in the siren coverage area. Use of the mobile PA system will be simulated during the demonstration; an audible PA test will be conducted prior to departure. The demonstration will be initiated by the exercise controller.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake Counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail. Lake County will FAX the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the three counties by directly proceeding to the briefing room and reading the contents of the message to the assembly of news media representatives and answering any questions pertaining to the message. This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Geauga and Lake Counties will also coordinate release of other informational and instructional message as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least one trend will be demonstrated.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

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.

Extent of Play

N/A – Geauga County will not demonstrate this criterion. The two public monitoring/decontamination care centers were evaluated in the past 2 exercises: the Cardinal High School care center in 2008 and the Notre Dame Cathedral Latin High School care center in 2006. In addition, the Geauga County Emergency Worker Monitoring Decontamination facility at Chardon High School was evaluated in the 2008 exercise.

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.

Extent of Play

N/A – The Chardon Fire Department successfully demonstrated this criterion at Chardon High School during the 2008 Evaluated Exercise.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

Extent of Play

The American Red Cross successfully demonstrated this Criterion at the Cardinal High School care center during the 2008 exercise and at the Notre Dame Cathedral Latin care center during the 2006 exercise.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

N/A – Geauga County will not demonstrate this criterion.

GEAUGA COUNTY

Demonstrating Agency/ Location	Date/ Time
Initial Notification Point Geauga County Sheriff's Dispatch Center 12450 Merritt Road Chardon, OH Contact: Dale Wedge, Director Geauga County Department of Emergency Services (DES) (440) 279-2170 Directions: The Sheriff's Dispatch Center is located in the Geauga County Sheriff's Office complex. Take State Route 44 to Merritt Road. Turn left (east) on Merritt Road (about 2 miles south of Route 322) and turn in at the first driveway on the left.	09/28/10 ~0800 hours
Emergency Operations Center 12518 Merritt Road Chardon, OH Contact: Dale Wedge, Director 440) 279-2170 Directions: Take Rt. 44 south to Merritt Road. Turn left (east) on Merritt Road (about 2 miles south of Route 322) and turn in at the second driveway on the left.	09/28/10 ~0800 hours
Joint Information Center Lakeland Community College 7700 Clocktower Drive Mentor, OH Contact, Linda Burhenne, Geauga County Public Information Officer (PIO) (440) 269-7107 or (440) 269-7122/7115/7116 Directions: The main entrance (Clocktower Drive) is from Rt. 308, just south of Interstate 90. (Also, there is a back entrance from Garfield Road not far from the Lake County EOC.) The Performing Arts Center is to the immediate left of the clock tower. Enter the doors directly under the overhead walkway. If the security personnel will not admit you, ask for an Exercise Controller or the Government Liaison person. Parking: Secured parking is available in the lot directly across from the clock. The parking code to enter will be given at the pre-exercise briefing. The gate lifts automatically when exiting. Parking is also available in the student parking lots.	09/28/10 ~930 hours
Back-Up Route Alerting Thompson Fire Department 6778 Madison Road	09/28/10 1930 hours

Demonstrating Agency/ Location	**Date/ Time**

Thompson, OH
Contact: Chief Dan Robison
(440) 298-1405
Directions: Travel east on Rt.90 to Rt. 528; turn right (south) on Rt. 528 and travel approximately 6 miles into Thompson. Go halfway around the square; the fire department is on the right.

School District
Ledgemont School District — 09/29/10
Superintendent's Office — 0930 hours
Board of Education
16200 Burrows Road
Thompson, OH 44086
Contact: Ron Donatone, Superintendent
(440) 298-3341
Directions: Take Rt. 90 east to Rt. 528; turn right (south) and travel approximately 5 miles into Thompson. Go half-way around the town square and continue on Rt. 528 approximately 3 miles to Burrows Rd. and turn right. The Board of Education is in the Elementary School.

PERRY NUCLEAR POWER PLANT
RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE
09/28/2010

TIMELINE OF EVENTS

This exercise will be conducted using an operations crew in the Perry control room simulator which will provide "live" simulator data to exercise participants. Exact event times provided in this Timeline may vary based on crew response or controller direction.

Event No.	Event Description	Event Time
1.	Explosion due to a dropped CO2 extinguisher damaging Safe-Shutdown equipment.	~0735
2.	Contaminated Injured Person	~0735
	Explosion – Alert – FA1	~0750
3.	Main Turbine Trip – Reactor Scram Failure, ATWS	~0915
	Failure to Shutdown the Reactor – Site Area Emergency – CS1	~0930
4.	Main Steam Drain Line Pipe Break	~1030
5.	Emergency Depressurization (ED)	~On ED
6.	Fission Product Barrier Loss and Radioactive Release	~1140
	Loss of Fission Barriers and Radiation Release General Emergency – AG1/HG1	~1155
7.	Change in Wind Direction	~1305
	Par Changed Based on Wind Direction Change	~1320
8.	Exercise Termination	~1430
9.	Critique	~1500

CONTAMINATED / INJURED PERSON
Medical Services (MS-1)
Mini Scenario

Demonstration Locations:

- Lakeside High School (Ashtabula County)

This scenario will involve a contaminated emergency worker slipping in the locker room and sustaining a broken wrist. Fire Department personnel, trained in monitoring and decontamination, will assist as necessary (as players).

At the demonstrating facility, the exercise controller will use oral injects to facilitate this scenario.

- Any individual can act as the contaminated injured emergency worker.
- The victim will sustain a broken left wrist during this fall.
- The location and intensity of the contamination is as 1300 cpm on the left palm.
- The individual had just been decontaminated the 2nd time and was in the process of being monitored post decon.

NO transportation from the facility will take place.

- Tri-Point Center (Lake County)

At the demonstrating facility, the exercise controller will use oral injects to facilitate the scenario.

NOTE: Victim scenario – Fire watch inadvertently knocks over a CO2 fire extinguisher causing the cylinder to explode. The fire watch receives a puncture wound and broken right upper arm by flying debris. The victim was also sprayed in the face and upper body by leakage (approximately a half pint) from a broken stainless instrument line Containing contaminated liquid. The victim is ambulatory.

- The location and intensity of the contamination is as identified on Attachment #1.

- The individual will be decontaminated as appropriate for the contamination Levels and location identified.
- Two decontamination attempts will be necessary to reduce monitor readings To acceptable levels.
- Proper nasal smears should be taken based on contamination on the face.

Upon Arrival at Tri-Point Medical Center

Mouth and nasal area: 2500 cpm.
Wound area and upper body: 3000 cpm.

2nd Monitoring

After decontamination: 600 cpm.

3rd Monitoring

After decontamination: Background.

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