

May 17, 2011

Mr. Brian McDermott
Director, Division of Preparedness and Response
Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Ref: Response to Nuclear Regulatory Commission Request for FEMA Lessons Learned Related to Offsite Emergency Preparedness Following Hurricane Katrina.

Dear Mr. McDermott:

This is in response to an e-mail from Mr. Joseph Anderson dated Tuesday, May 10, 2011, with a request from the NRC Fukushima Daiichi Task Force for FEMA to provide information on a number of topics, including emergency preparedness (EP) lessons-learned from Hurricane Katrina.

The definitive report of lessons learned from Hurricane Katrina was "The Federal Response to Hurricane Katrina: Lessons Learned," released by the White House on February 23, 2006 (http://georgewbush-whitehouse.archives.gov/reports/katrina-lessons-learned/). This report detailed the incident and the federal response, provided lessons learned and made recommendations for emergency managers at all levels.

Virtually all federal, state, tribal and local Offsite Response Organizations involved in EP at fixed nuclear facilities also have the greater mission of all hazards emergency preparedness and response. The lessons learned from Hurricane Katrina has led to initiatives that apply to the entire Emergency Management Community to which we and our stakeholders belong. Below are some of the more significant acts of legislation, strategies and guidance that have led to enhancements in national preparedness in the aftermath of Hurricane Katrina.

Presidential Executive Order 12148 "Federal Emergency Management, July 20, 1979"

This executive order directed FEMA to establish federal policies, coordinate civil emergency planning management and assistance functions, and represent the President in working with State, local, and tribal governments and the private sector. After the Three Mile Island accident, President Carter directed FEMA to lead State and local emergency planning and preparedness activities for communities near commercial nuclear power plants. For the last 30 years, using regulation, guidance,

and training, FEMA's Radiological Emergency Preparedness Program (REPP) has provided reasonable assurance of public health and safety in communities near commercial nuclear power plants. The operating environment faced by REPP has evolved over the last three decades. The terrorist attacks of September 11, 200 I, anthrax attacks, devastation of Hurricane Katrina, and the potential of a possible pandemic have all changed the nation's perspective on preparedness. These include establishment of the Department of Homeland Security, the National Response Framework, National Incident Management System, National Preparedness Guidelines, and implementation of a National Exercise Program (NEP). NEP was established to align Federal and State/local exercise priorities and requirements. The NEP established the Homeland Security Exercise and Evaluation Program (HSEEP) as the doctrine for scheduling, planning, conducting and evaluating' exercises. HSEEP incorporates the tenets of the National Preparedness Guidelines, National Incident Management System, National Response Framework and other related plans and strategies.

Post Katrina Emergency Management Reform Act (PKEMRA)

Hurricane Katrina highlighted that four years after 9/11 there were still critical challenges that hindered the ability of Federal departments and agencies to work together in response to a National crisis. These challenges reflected, among other factors, the lack of overall preparedness on the part of Federal incident managers and responders in terms of planning, coordination, communication, knowledge, training, and exposure to incident management principles.

The following examples from the White House Hurricane Katrina Lessons Learned report serve to illustrate this point:

<u>Command and Control</u>. "Command centers in the Department of Homeland Security (DHS) and elsewhere in the Federal government had unclear, and often overlapping, roles and responsibilities that were exposed as flawed during this disaster. The Secretary of Homeland Security is the President's principal Federal official for domestic incident management, but he had difficulty coordinating the disparate activities of the Federal departments and agencies."

<u>Federal Resource Coordination</u>. "Ineffective communications between FEMA and other Federal departments and agencies prevented available Federal resources from being effectively used for response operations."

<u>Law Enforcement and Security</u>. "Federal officials attempted to have law enforcement officers protect emergency responders against security threats. However, due to a lack of planning, arranging this support took several days, during which the situation grew worse."

<u>Training for Joint Field Offices (JFOs).</u> "This inability to place trained personnel in the JFO had a detrimental effect on operations, as there were not enough qualified persons to staff all of the required positions. We must require all incident management personnel to have a working knowledge of (the National Incident Management System and Incident Command System) principles."

<u>Human Services Delivery</u>. "The Federal government's system for distribution of human services was not sufficiently responsive to the circumstances of a large number of victims – many of whom were particularly vulnerable – who were forced to navigate a series of complex processes to obtain critical

services in a time of extreme duress. Disaster Recovery Centers (DRCs) did not provide victims single-point access to apply for a wide array of Federal assistance programs."

Presidential Policy Directive 8: "National Preparedness" (PPD-8)

PPD-8 directs the development of a national goal for preparedness to identify those activities that must be accomplished in order to prevent and protect against acts of terrorism in the homeland and mitigate against, respond to, and recover from emergencies and disasters regardless of their cause. The Secretary of Homeland Security, through the Administrator of the Federal Emergency Management Agency (FEMA), is responsible for coordinating the domestic all-hazards preparedness efforts of all executive departments and agencies, in consultation with State, local, tribal, and territorial governments, nongovernmental organizations, private-sector partners and the general public; and for developing the **National Preparedness Goal**. All executive departments and agencies with roles in prevention, protection, mitigation, response or recovery from an emergency or disaster on U.S. soil are responsible for national preparedness efforts, consistent with their statutory roles and responsibilities.

The Goal shall identify the core capabilities that must be enabled by the Nation in order to prevent, protect against, mitigate the effects of, respond to, and recover from acts of terrorism and emergencies and disasters regardless of cause. The Goal should respect and leverage the Nation's Federal, State and local governmental structures, maximizing preparedness though adaptability and decentralization. The Goal should support cooperative common thinking about strategic needs while ensuring that all levels of government share common understanding and awareness of threats and hazards and resulting risks, are ready to act, and can do so independently but collaboratively. The Goal should establish common intent and foster robust partnerships across all communities and levels of government; build the capacity of partners across jurisdictional boundaries; and encourage dynamic coordination and cooperation.

National Preparedness System

As outlined in the Draft "Implementation Plan for PPD-8: National Preparedness", the Secretary of Homeland Security, acting through the FEMA Administrator, shall provide to the President, through the Assistant to the President for Homeland Security and Counterterrorism, a document describing the national preparedness system.

The system should provide an integrated approach to preparedness that can be implemented and measured at all levels of government. The system should provide an all-of-Nation and whole-of-community approach to preparedness, from neighborhood organizations to civic groups and private businesses. It should contain a methodical approach integrated across the preparedness cycle and link together programs and requirements into a comprehensive system, driving rational decision-making and allowing for a direct and defensible assessment of progress against clearly defined objectives.

The system should be based on a consistent methodology for assessing the threats and hazards facing a given jurisdiction. The findings of the assessment should then drive planning factors and all other components of the preparedness cycle including resource requirements, existing capabilities and capability gaps, driving investments to close those gaps, making and validating improvements in capabilities through training and exercising, and continually assessing progress. The system shall

include and incorporate the elements required in Section 644 of the Post-Katrina Act.

- (1) Target capabilities and preparedness priorities.
- (2) Equipment and training standards.
- (3) Training and exercises.
- (4) Comprehensive assessment system.
- (5) Remedial action management program.
- (6) Federal response capability inventory.
- (7) Reporting requirements.
- (8) Federal preparedness.

Integrated Public Alert and Warning System (IPAWS)

Executive Order 13407, "Public Alert and Warning System, June 26, 2006" established as policy the requirement for the United States to have an effective, reliable, integrated, flexible, and comprehensive system to alert and warn the American people. FEMA is designated within the Department of Homeland Security to implement the policy of the United States for a public alert and warning system as outlined in Executive Order 13407 and has established a program office to implement IPAWS. FEMA and its federal partners, the Federal Communications Commission, the National Oceanic and Atmospheric Administration's National Weather Service and the DHS Science and Technology Directorate are working together to transform the national alert and warning system to enable rapid dissemination of authenticated alert information over as many communications channels as possible. For more details regarding what IPAWS will do, please access the following weblink:

http://www.fema.gov/emergency/ipaws/

I hope this information will prove useful to the work of the Fukushima Daiichi Task Force. Once you have an opportunity to review this information, please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely

Timothy Greten

Deputy Director

Technological Hazards Division

cc: Mark Thaggard, NRC