

# EMERGENCY PREPAREDNESS RULE AND RADIOLOGICAL EMERGENCY PREPAREDNESS PROGRAM MANUAL GUIDANCE

## IMPLEMENTATION FORUMS



**FEMA**





# TOPICS

- Brief Overview of EP Rulemaking, Guidance Documents, REP Program Manual and NUREG 0654/FEMA-REP-1, Rev. 1 Supplement 4
- Backup Means for Alert and Notification Systems
- Challenging Drills and Exercises
- FEMA REP Program Demonstration Guidance
- Evacuation Time Estimate Updates
- Supplement 3 to NUREG-0654/FEMA-REP-1
- ERO Augmentation at Alternative Facilities
- Onsite Protective Actions
- Emergency Plan Change Process
- Emergency Declaration Timeliness
- On-Shift Staffing Analysis

# EP Rule Implementation Forum Agenda | 2011/2012

<b>DAY 1</b>	
8:00AM	Introductions, Forum Overview, and Opening Remarks
	Purpose and Scope of REP Program Manual Programmatic Changes and Evaluation of Offsite Preparedness Supplement 4 to NUREG-0654/FEMA-REP-1 EP Rulemaking and Guidance Documents (FEMA, NRC, OROs, and Industry Representatives)
	Backup Means for Alert and Notification Systems (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
<b>11:30AM Lunch Break</b>	
1:00PM	Challenging Drills and Exercises: 8-Year Exercise Cycle, Scenario Variations, and HSEEP (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: HAB Exercises, NIMS/ICS, Licensee Coordination with OROs, and ORO Event Response Integration (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: No/Minimal Radiological Release (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
5:00PM	Day 1 Recap (FEMA, NRC, OROs, and Industry Representatives)
5:30PM	Adjourn

<b>DAY 2</b>	
8:00AM	<p>Day 2 Opening Remarks</p> <hr/> <p>Program Demonstration Guidance            Credit for Actual Events            Exercise Guidance Structure            REP Program Administration            Offsite Plan Updates            (FEMA, NRC, OROs, and Industry Representatives)</p> <hr/> <p>Evacuation Time Estimate Updating            Supplement 3 to NUREG-0654/FEMA-REP-1            (FEMA, NRC, OROs, and Industry Representatives)</p> <hr/> <p>Opportunity for Public Participation</p>
<b>11:45AM Lunch Break</b>	
1:15PM	<p>ERO Augmentation at Alternative Facilities            (FEMA, NRC, OROs, and Industry Representatives)</p> <hr/> <p>Onsite Protective Actions            (FEMA, NRC, OROs, and Industry Representatives)</p> <hr/> <p>Emergency Plan Change Process            (FEMA, NRC, OROs, and Industry Representatives)</p> <hr/> <p>Opportunity for Public Participation</p>
5:00PM	<p>Day 2 Recap            (FEMA, NRC, OROs, and Industry Representatives)</p>
5:30PM	<p>Adjourn</p>

<b>DAY 3</b>	
8:00AM	Day 3 Opening Remarks
	Emergency Declaration Timeliness (FEMA, NRC, OROs, and Industry Representatives)
	On-Shift Staffing Analysis (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
11:45AM	Day 3 Recap/Forum Closing Remarks (FEMA, NRC, OROs, and Industry Representative)
12:00PM	Adjourn

## EP FINAL RULE AND GUIDANCE DOCUMENT LISTING



DOCUMENT ID	DOCUMENT DESCRIPTION	LINK
<b>EP FINAL RULE PACKAGE</b>		
N/A	Final Rule <i>Federal Register</i> Notice*	ML112070125
N/A	Regulatory Analysis and Backfit Analysis*	ML112971541
N/A	Summary and Analysis of Public Comments on Proposed Rule Language*	ML112971546
SECY-11-0053	Final Rule Enhancements to Emergency Preparedness Regulations Package	<a href="#">ML102150182</a>
SRM-M110830A	Staff Requirements – Affirmation Session, 8:55 A.M., Tuesday, August 30, 2011 (SECY-11-0053 – Final Rule)	<a href="#">ML112420153</a>
<b>GUIDANCE DOCUMENTS</b>		
N/A	FEMA REP Program Manual	<a href="http://www.fema.gov/about/divisions/thd_repp.shtm">http://www.fema.gov/about/divisions/thd_repp.shtm</a>
RG 1.219	Guidance on Making Changes to Emergency Response Plans for Nuclear Power Reactors*	ML102510626
NSIR/DPR-ISG-01	Interim Staff Guidance Emergency Planning for Nuclear Power Plants*	ML113010523
NUREG-0654/FEMA-REP-1, Supplement 3	Guidance for Protective Action Strategies*	ML113010596
NUREG-0654/FEMA-REP-1, Supplement 4	Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants	<a href="http://www.fema.gov/about/divisions/thd_repp.shtm">http://www.fema.gov/about/divisions/thd_repp.shtm</a>
NUREG/CR-7002	Criteria for Development of Evacuation Time Estimate Studies*	ML113010515
N/A	FEMA REP Program Manual and Supplement 4 Comment Adjudication Report – Organized by Topic	<a href="http://www.fema.gov/about/divisions/thd_repp.shtm">http://www.fema.gov/about/divisions/thd_repp.shtm</a>

\* Document is draft and will be officially issued upon publication of the EP final rule *Federal Register* notice in the *Federal Register*.

DOCUMENT ID	DOCUMENT DESCRIPTION	LINK
NEI 10-05	Assessment of On-Shift ERO Staffing and Capabilities	<a href="#">ML111751698</a>
NEI 06-04, Appendix A	Recommended [Hostile Action-Based] Drill and Exercise Objectives	<a href="#">ML112091915</a>

\* Document is draft and will be officially issued upon publication of the EP final rule *Federal Register* notice in the *Federal Register*.



**Emergency Preparedness  
Final Rule And Guidance  
Implementation Forum**

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**Overview**

- Emergency Egress
- Restrooms
- Cell phones and pagers

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**Meeting Purpose**

- Explain expectations for implementation of the final rule and guidance documents
- Answer questions related to implementation to provide clarification

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### Implementation Site Workshops

- FEMA Regions will coordinate with OROs to plan implementation site workshops
- Site workshops will be ongoing surrounding the RPM Forums
- Workshops are **NOT** inspections and will allow for in depth discussion on changes/updates needed for specific state and local plans

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### Participation

- Multiple ways to participate today –
  - In-Person
  - “Viewing” using the Internet
  - “Listening” using the Toll-free Teleconference
- Please use the Microphone when speaking

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### Participation

- Category 2 Meeting
  - Primary focus is for licensees and State, local, Tribal governments to gain clarity on how to implement the rule and guidance changes
  - Dedicated times on the agenda for others to ask questions

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**For those participating remotely ...**

- Out of respect for other listeners:
  - Please mute your phone (\*6)
  - Don't forget to un-mute (\*6) to ask your question

**For everyone who asks a question...**

- Please state your name, organization, and your question for the panel

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**Day 1 Morning Agenda**  
(Category 2 Meeting)

8:00AM	Introductions, Forum Overview, and Opening Remarks
	Purpose and Scope of REP Program Manual, Programmatic Changes and Evaluation of Offsite Preparedness, Supplement 4 to NUREG-0654/FEMA-REP-1, EP Rulemaking and Guidance Documents (FEMA, NRC, OROs, and Industry Representatives)
	Backup Means for Alert and Notification Systems (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
11:30AM	Break

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**Day 1 Afternoon Agenda**  
(Category 2 Meeting)

1:00PM	Challenging Drills and Exercises: 8-Year Exercise Cycle, Scenario Variations, and HSEEP (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: HAB Exercises, NIMS/ICS, Licensee Coordination with OROs, and ORO Event Response Integration (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: No/Minimal Radiological Release (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
5:00PM	Day 1 Recap (FEMA, NRC, OROs, and Industry Representatives)
5:30PM	Adjourn

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**Forum Opening Remarks**

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**Background**

- Strategic Review Steering Committee (SRSC), 1996
- Included input from Federal, State, Tribal, and local stakeholders
- Initiative 1.13: "Develop REP Handbook"
  - Desk reference incorporating existing FEMA REP guidance
  - Eliminate piecemeal policy and guidance sources



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**Background**

- 2002 REP Exercise Evaluation Methodology introduced
- 2002 Interim REP Program Manual
  - Incorporated revised Exercise Evaluation Methodology and other SRSC Initiatives
  - Planning Section under development



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**Background**

- Intervening Years (2002-2009)
- Planning Section developed
- Exercise Evaluation Areas finalized
- Stalled attempts to finalize due to competing priorities



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**Background**

- Align REP policy and guidance with tenets of National Incident Management System (NIMS), National Response Framework (NRF), and Homeland Security Exercise Evaluation Program (HSEEP)
- Enhance scenario realism and eliminate pre-conditioned exercise activities (negative learning)
- Establish "Part II," embedding planning guidance that was not included in 2002 Interim version
- Incorporate and retire FEMA REP's legacy operative policy and program memoranda



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**Background**

- Revised Manual and Supplement 4 posted for public comment in May 2009
- Multiple public meetings to inform and receive feedback
- Adjudicated 2,340 comments from stakeholders
- Impact Paper Meetings in May through August 2010



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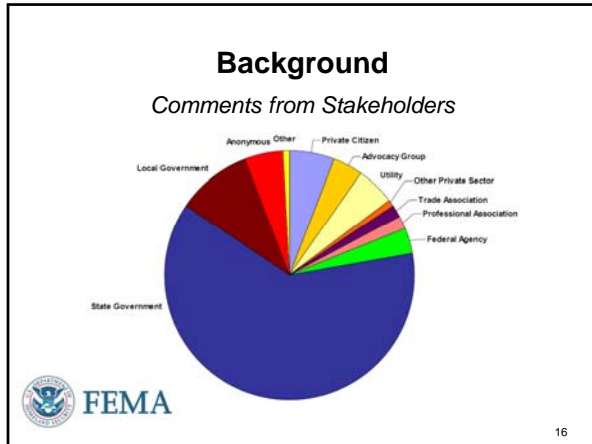
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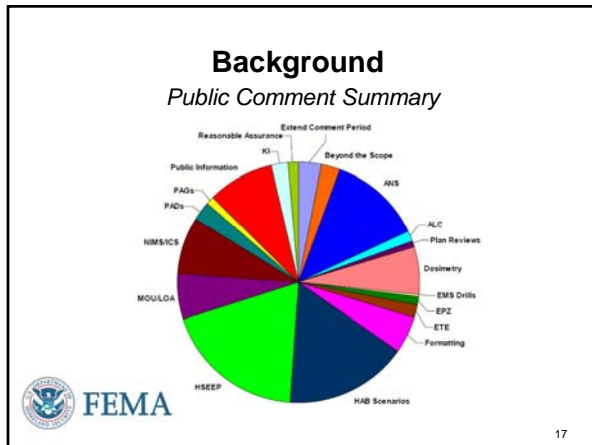
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### Background

- Comment Adjudication Matrix developed
  - Available for download at [www.regulations.gov](http://www.regulations.gov)
- Collaboration with the NRC
- The final Manual evolved from the adjudicated comments, additional contemporary emergency management principles, and Department of Homeland Security publication standards.

FEMA

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Radiological Emergency Preparedness Program's  
**Manual Structure**



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**Purpose**

- Single-source that provides contemporary REP guidance
- Amplifies planning standards and evaluation criteria in regulatory guidelines:
  - NUREG-0654/FEMA-REP-1, Rev.1 and 44 CFR Part 350
- Aligns FEMA offsite activities with NRC regulations and rulemaking activities



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**Disclaimer**

- For any relevant policy or guidance not incorporated into this manual, the REP Program will regard the subject material, in its current format, as the currently held position on the referenced matter until FEMA can appropriately revise the manual.
- To the greatest extent possible, FEMA will issue all future REP Program guidance as amendments to the applicable parts of this manual.



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**REP Program Manual Structure**

Major Sections

- Part I - Introduction to the REP Program Manual
- Part II - REP Program Planning Guidance
- Part III - REP Program Demonstration Guidance
- Part IV - FEMA REP Program Administration
- Appendices



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**REP Program Manual Structure**

Major Sections

- **Part I - Introduction to the REP Program Manual**
- Part II - REP Program Planning Guidance
- Part III - REP Program Demonstration Guidance
- Part IV - FEMA REP Program Administration
- Appendices



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**Part I - Introduction to the REP Manual**

- Purpose
- Scope
- Establishment of the REP Program
- Programmatic changes
- Evaluation of REP at Commercial Nuclear Power Plants
- Technical Basis for the Program



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### REP Program Manual Structure

Major Sections

- Part I - Introduction to the REP Program Manual
- **Part II - REP Program Planning Guidance**
- Part III - REP Program Demonstration Guidance
- Part IV - FEMA REP Program Administration
- Appendices



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### Part II - Program Planning Guidance

Subparts

- Planning Standards
- Planning Guidance
- Conducting Review of Plans/Procedures
- Annual Reporting Process



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### REP Program Manual Structure

Major Sections

- Part I - Introduction to the REP Program Manual
- Part II - REP Program Planning Guidance
- **Part III - REP Program Demonstration Guidance**
- Part IV - FEMA REP Program Administration
- Appendices



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### Part III - Demonstration Guidance

Subparts

- REP Exercise Process
- Assessment Areas
  - Intent
  - Demonstration Criteria
  - Assessment Area/Extent of Play
- Evaluation of Medical Services Drills



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### REP Program Manual Structure

Major Sections

- Part I - Introduction to the REP Program Manual
- Part II - REP Program Planning Guidance
- Part III - REP Program Demonstration Guidance
- **Part IV - FEMA REP Program Administration**
- Appendices



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### Part IV - Program Administration

- General guidance on the FEMA REP Program administrative policies and procedures
- Examples provided in this Part are meant to show how a particular task may be accomplished, but are not intended to mandate a specific way of accomplishing tasks



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## REP Program Manual Structure

Major Sections

- Part I - Introduction to the REP Program Manual
- Part II - REP Program Planning Guidance
- Part III - REP Program Demonstration Guidance
- Part IV - FEMA REP Program Administration
- **Appendices**



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## Appendix A


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- Abbreviations and Acronyms used in the REP Program

## Appendix B

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- Glossary of REP Terms



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## Appendix C


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- REP Guidance References

## Appendix D

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- Historical REP Guidance References



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**Key Programmatic Changes**



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**Programmatic Changes**  
*DHS National Preparedness Initiatives*

- NIMS
- NRF
- National Preparedness Guidelines – HSEEP
- FEMA Comprehensive Preparedness Guide (CPG 101)
- Post-Katrina Emergency Management Reform Act (PKEMRA)



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**Programmatic Changes**  
*Scenario Enhancements*

- Introduce hostile actions into scenarios
- Vary the radiological releases
- Reduce preconditioning of players



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**Programmatic Changes**  
*National Preparedness Guidelines*

- REP Program exercises will use the HSEEP methodology and guidance for exercise program management, design, development, conduct, evaluation, and improvement planning.
- The requirement applied only to REP exercise conduct, not other non-REP Program Offsite Response Organization (ORO) activities.
- The HSEEP methodology will not alter requirements for the REP Program under NUREG-0654/FEMA-REP-1, establish any additional exercise evaluation requirements for the REP Program, or replace existing REP Program Demonstration Criteria with new capabilities.



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**Programmatic Changes**  
*PKEMRA*

- Functional Needs Support Service
- Full and Equal Services
- A Right to Service

*Integrate children and adults with and without disabilities who have access and functional needs into EVERY aspect of emergency shelter planning and response*



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**Clarifying Language**



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**Clarifying Language**  
*Service Animals and Household Pets*

- March 2011 American with Disabilities Act updated the service animal definition (recognizes dogs only).
- CPG 101 - household pets
- No specific guidance on the radiological monitoring and decontamination of household pets



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**Clarifying Language**  
*Should and Shall*

- Direct quotes from regulatory material uses both "shall" and "should" to denote requirements
  - i.e., Planning Standard G
- Remaining text uses "shall", "must", and "require" denote mandatory items from regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations



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**Clarifying Language**  
*Should and Shall*

- "Should", "suggest", and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of REP regulations.
- "May" denotes an option which is neither a requirement nor recommendation



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NUREG-0654/FEMA-REP-1, Rev.1

**Supplement 4**



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**Supplement 4**

- Provides guidance to OROs with respect to preparing offsite plans and conducting exercises in a manner that will be found acceptable to FEMA and the NRC
- This document revises and adds Evaluation Criteria and revises Appendix 3 of NUREG-0654/FEMA-REP-1, Rev. 1



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**Supplement 4**

Four Emerging Issues:

- Aligning the offsite REP Program with national preparedness initiatives under Homeland Security Presidential Directive (HSPD)-5 and Presidential Policy Directive (PPD)-8
- Preparing for and responding to hostile action-based (HAB) incidents at NPPs
- Enhancing scenario realism and reducing negative training and pre-conditioned responses of exercise participants
- Ensuring backup means are in place for alert and notification systems



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### Supplement 4

Contents:

1. Introduction
2. Integration of National Preparedness Initiatives into ORO Response Plans and Activities
3. Coordination between OROs and Licensees during a Hostile Action-Based Incident
4. Challenging Drills and Exercises
5. Backup Means for Alert and Notification
6. Summary of Revisions



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### EP Rule and Guidance Documents

EP Final Rule <i>Federal Register</i> Notice (76 FR 72560)	ADAMS Accession No. <a href="#">ML112070125</a> <a href="http://www.regulations.gov/">http://www.regulations.gov/</a> (NRC-2008-0122)
FEMA REP Program Manual	<a href="http://www.fema.gov/about/divisions/thd_repp.shtm">http://www.fema.gov/about/divisions/thd_repp.shtm</a>
Supplement 4 to NUREG-0654/ FEMA REP-1	<a href="http://www.fema.gov/about/divisions/thd_repp.shtm">http://www.fema.gov/about/divisions/thd_repp.shtm</a>
Regulatory Guide 1.219	ADAMS Accession No. <a href="#">ML102510626</a>
NUREG/CR-7002	ADAMS Accession No. <a href="#">ML113010515</a>
NSIR/DPR-ISG-01	ADAMS Accession No. <a href="#">ML113010523</a>
Supplement 3 to NUREG-0654/ FEMA REP-1	ADAMS Accession No. <a href="#">ML113010596</a>
NEI 10-05	ADAMS Accession No. <a href="#">ML111751698</a>
NEI 06-04, Appendix A	ADAMS Accession No. <a href="#">ML112091915</a>

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### Questions on this topic?

- If you're in the room, pass in a card with your name and organization on it
- If you're on the phone, please tell the Phone Moderator your name and organization

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### Alert and Notification System (ANS) Backup Means

New/Revised Guidance

- With licensee, identify and develop both administrative and physical means for a backup public ANS
- Capable of covering essentially 100% of population within plume EPZ
- Backup means conducted within reasonable time (goal of 45 minutes)
- Independent backup means of public notification is required

Actions/Deliverables

- ANS Design Report and emergency plan update
- Implementation of backup means



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### ANS Backup Means

Implementation

- Existing site with existing FEMA-approved ANS backup means
  - December 24, 2012
- Site with no FEMA-approved ANS backup means
  - Submit report to FEMA by June 24, 2013
- After FEMA Approval
  - 12 months to implement new system
  - Backup system shall be implemented by June 22, 2015



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### ANS Backup Means

Exercise Cycle Requirements

- Exercise Demonstration 5.a.3.
- No less than once a cycle



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**Alert and Notification System (ANS)  
Backup Means**

New/Revised Requirements

- Alert and Notification Functions
- Flexibility and Phased Approach
- ERPA's and Targeted Areas

Actions/Deliverables

- ANS Design Report and Emergency Plan Update
- Backup Means Implementation
- Admin. Controls, Training, and Testing Program

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**ANS Backup Means**

Implementation

- FEMA-Approved ANS Backup Means
  - December 24, 2012: ANS Backup Means Implemented
- Add ANS Backup Means
  - June 24, 2013: ANS Design Report to FEMA
  - 365 Days After FEMA Approval: ANS Backup Means Implemented
  - June 22, 2015: Total Time Not to Exceed 3.5 Years

Inspection

- IP 71114.02

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**ANS Backup Means**

Guidance (NSIR/DPR-ISG-01)

- Essentially 100% Coverage
- Phased Approach
- Targeted Areas
- Reasonable Time (45-Minute Goal)
- Types of Backup Means

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**Questions on this topic?**

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**Opportunity  
For  
Public Participation**

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**The morning session for the  
implementation forum has ended**

**We will resume at 1:00PM**

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**Day 1 Afternoon Agenda**  
(Category 2 Meeting)

1:00PM	Challenging Drills and Exercises: 8-Year Exercise Cycle, Scenario Variations, and HSEEP (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: HAB Exercises, NIMS/ICS, Licensee Coordination with OROs, and ORO Event Response Integration (FEMA, NRC, OROs, and Industry Representatives)
	Challenging Drills and Exercises: No/Minimal Radiological Release (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
5:00PM	Day 1 Recap (FEMA, NRC, OROs, and Industry Representatives)
5:30PM	Adjourn

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Challenging Drills and Exercises

**8-Year Exercise Cycle**



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**8-Year Exercise Cycle**

New/Revised Guidance

- Exercise cycle expanded to accommodate enhanced scenario variations
- The site-specific 8-year exercise cycle requirement will begin when the licensee's exercise incorporates an HAB initiating event into its scenario



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**8-Year Exercise Cycle**

Action/Deliverables

- Update exercise schedule
  - All Demonstration Criteria are evaluated once in an 8-year exercise cycle
- Certain core elements evaluated at least biennially regardless of the scenario

Implementation/Exercise Cycle Requirements

- The licensee is required to begin the cycle no later than December 31, 2015



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**Challenging Drills and Exercises**

**Scenario Variations**



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**Scenario Variations**

New/Revised Guidance

- REP exercise scenarios need to be enhanced to help avoid anticipatory responses by exercise participants due to preconditioning and to emphasize the expected interfaces and coordination between key decision-makers based on realistic postulated events.
- The initiating event of a REP Program exercise scenario is now varied to go beyond the traditional equipment malfunctions and plant operator actions and bring more of an all-hazards perspective to the overall exercise cycle.



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### Scenario Variations

- Types of variations:
- Rapidly Escalating Scenario - Initial classification of, or rapid escalation to, an Site Area Emergency or General Emergency
- Ingestion Pathway Scenario - No less than once every 8 year exercise cycle; can be combined with any plume scenario with a release
- Hostile Action Based Scenario - Licensees required to host a functional hostile action-based exercise by end of CY 2015
- No/Minimal Radiological Release Scenario - Requirement for licensees; OROs encouraged to participate



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### Scenario Variations

Action/Deliverables

- Develop exercise schedules incorporating the new requirements
- Revise drill and exercise programs to address the new requirements
- Track and document the demonstration of the required scenario elements during each cycle
- Complete each scenario during the 8-year cycle



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### Scenario Variations

Implementation/Exercise Cycle Requirements

- New exercise cycle starts with the HAB scenario. Vary the scenario from then on
- Regardless of the scenario, certain core elements of the Evaluation Areas still must be evaluated at least biennially



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## Scenario Variations

Guidance References

- REP Program Manual, October 2011
  - Planning Standard N
- Supplement 4 to NUREG-0654/FEMA-REP-1, Rev. 1



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## Challenging Drills and Exercises Integration of HSEEP



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## HSEEP

Integration of HSEEP  
***DOES NOT***  
alter requirements, establish additional  
evaluation requirements, or replace  
Demonstration Criteria with new  
capabilities

*FEMA will continue to issue Areas Requiring Corrective  
Action (ARCAs) and Deficiencies during REP exercises  
when appropriate*



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## HSEEP

### New/Revised Guidance

- HSPD-8 established HSEEP as the official policy for all FEMA exercise activities
- Requires all federal exercises to adhere to the methodologies, terminology and documentation standards delineated within the HSEEP Reference Volumes
- REP Program exercises will use the HSEEP methodology and guidance for exercise program management, design, development, conduct, evaluation, and improvement planning



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## HSEEP

### Actions/Deliverables

- Conduct exercise program management, design, development, evaluation, and improvement planning using the HSEEP methodology

### Implementation

- All FEMA Regions have begun using the HSEEP methodology for exercises
- Continued use is recommended



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## HSEEP

### Supplemental Information

FEMA has developed two tools for use:

- Criterion-capability crosswalk
- REP Program-specific exercise evaluation guides (EEGs)
  - Guides include target capability sets identified by FEMA that correlate to the REP Program Demonstration Criteria so that REP Program exercises can be evaluated using HSEEP exercise documents



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**Challenging Drills and Exercises**

New/Revised Requirements

- Hostile Action Exercises
- Additional Scenario Variations
- 8-Year Exercise Cycle
- NRC Review of Scenarios
- Remedial Exercises
- Key Skills
- Principal Functional Areas

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**Challenging Drills and Exercises**

Actions/Deliverables

- Exercise Scenario Submittal to NRC
- Exercise/Scenario Element Tracking

Implementation

- December 31, 2015: Hostile Action Exercise
- December 31, 2015: Start of 8-Year Exercise Cycle
- December 23, 2011: Remaining Drill/Exercise Requirements

Inspection

- IP 71114.01, 06, 07, and 08

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**Challenging Drills and Exercises**

Guidance (NSIR/DPR-ISG-01)

- Revised N.1.a, N.1.b, N.1.c, and N.4
- No/Minimal Rad. Release Options
- Scenario Elements for Each Exercise
- Scenario Elements During Each Cycle
- Scenario Elements for Drills
- Hostile Action Exercises (NEI 06-04, Rev. 2)
- 50.54(hh)(2) Strategies
- Remedial Exercises

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**Challenging Drills and Exercises**

Example of Initial 8-Year Exercise Cycle

- Year 1: Hostile Action
  - No/Minimal Radiological Release
  - Onsite/Offsite Response Integration
- Year 3: Plume Phase
  - 50.54(hh)(2) Strategies
- Year 5: Plume Phase/Ingestion Pathway
- Year 6: Off-hours/Unannounced
- Year 7: Plume Phase
  - Rapid Escalation

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**Questions on this topic?**

- If you're in the room, pass in a card with your name and organization on it
- If you're on the phone, please tell the Phone Moderator your name and organization

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**Challenging Drills and Exercises**

**Hostile Action Based Scenarios**



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## Hostile Action Based Scenarios

### New/Revised Guidance

- Hostile Action directed at the plant site involving the integration of offsite resources with onsite response

### Actions/Deliverables:

- Add new scenario variable to exercise schedule



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## Hostile Action Based Scenarios

### Implementation/Exercise Cycle Requirements:

- HAB scenario starts the new 8-year exercise cycle
- The HAB scenario variable
- Coincide with either a release or no/minimal scenario variable
- Cannot include a no/minimal release option for consecutive HAB exercises at a particular site



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## Hostile Action Based Scenarios

### Guidance References

- NUREG-0654/FEMA-REP-1, Supplement 4
- Program Manual: Part II-120
- Planning standards N.1., N.3., N.4



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**Challenging Drills and Exercise**  
**NIMS/ICS**



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**NIMS/ICS**

New and Revised Guidance

- HSPD-5 requires the Federal Departments and agencies to make the adoption of NIMS by OROs a condition for Federal preparedness assistance, through grants, contracts and other activities.
- HSPD-5 does not apply to private sector entities such as nuclear power plant licensees.
- Offsite response concepts based on ORO plans and procedures should be coordinated with licensee plans/procedures to ensure effective response and communications between the licensee and OROs.



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**NIMS/ICS**

Actions and Deliverables

- Integrate NIMS into ORO emergency plans/procedures
- Facilitate integration and coordination of response elements during an incident that affects a nuclear facility

Implementation

- Update plans and procedures by June 23, 2014



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**USNRC**  
U.S. Nuclear Regulatory Commission  
*Protecting People and the Environment*

**Licensee Coordination with Offsite Response Organizations**

New/Revised Requirements

- Identification of Offsite Resources
- Description of Assistance
- Resource Needs During Hostile Action

Actions/Deliverables

- Offsite Resource Needs Identified
- Resource Agreements Obtained
- Assistance Described in Emergency Plan

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**USNRC**  
U.S. Nuclear Regulatory Commission  
*Protecting People and the Environment*

**Licensee Coordination with Offsite Response Organizations**

Implementation

- June 23, 2014: Resources Identified, Agreements In Place, and Emergency Plan Updated

Inspection

- IP 71114.05

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**USNRC**  
U.S. Nuclear Regulatory Commission  
*Protecting People and the Environment*

**Licensee Coordination with Offsite Response Organizations**

Guidance (NSIR/DPR-ISG-01)

- Emergency Plan Resource Needs Review
  - Includes Hostile Action
- Assistance Expected from Offsite Agencies
  - Includes LLEAs, Firefighting, and Medical Response
- Shortfalls Identified and Addressed
- Written Agreements In Place
- Annual Review of Arrangements

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**ORO Event Response Integration**

Existing/Revised Requirements

- Prompt Communications Among Response Groups
- Assistance Expected from OROs

Actions/Deliverables

- Implementing Procedures Revised
- Licensee Liaisons Identified and Trained

Implementation

- Initial Hostile Action Exercise

Inspection

- IP 71114.07

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**ORO Event Response Integration**

Guidance (NSIR/DPR-ISG-01)

- New Evaluation Criterion C.6
- PAR Review
- Communications Between ICP and ERFs
- Multiple ORO Notification Pathways
- Public Information During Hostile Action
- Licensee Liaisons at ICP
- Command Structure Compatibility (e.g., NIMS/ICS)
- Site Access for Offsite Responders

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**Challenging Drills and Exercises**

**No/Minimal Release**

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### No/Minimal Release Scenario

New/Revised Guidance

- No radiological release or an unplanned minimal radiological release that requires the site to declare a Site Area Emergency, but does not require the declaration of a General Emergency



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### No/Minimal Release Scenario

Action/Deliverables

- OROs are encouraged to participate
  - *All participants involved in the development of the extent-of-play will need to collaborate closely in order to map out alternative strategies for how to observe any tasks NOT accomplished as a consequence of a no/minimal release biennial exercise.*

Implementation/Exercise Cycle Requirements

- Incorporate scenario into exercise schedule
- Demonstrate once every cycle



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### No/Minimal Release Exercise

- Licensee Requirement Once Per Cycle
- Site Area Emergency Required
- Offsite Protective Actions Not Required
- Evaluation Criterion N.1.b
- Three Considerations for OROs
  - Participate Jointly with Licensee
  - Identify Alternative Evaluation Method
  - Conduct Separate Integrated Exercise

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**Questions on this topic?**

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**Opportunity  
For  
Public Participation**

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**Day 1 Recap**

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**Adjourn Day 1**

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**Emergency Preparedness  
Final Rule And Guidance  
Implementation Forum**

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**Overview**

- Emergency Egress
- Restrooms
- Cell phones and pagers

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**Meeting Purpose**

- Explain expectations for implementation of the final rule and guidance documents
- Answer questions related to implementation to provide clarification

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**Participation**

- Category 2 Meeting
  - Primary focus is for licensees and State, local, Tribal governments to gain clarity on how to implement the rule and guidance changes
  - Dedicated times on the agenda for others to ask questions

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**Participation**

- Multiple ways to participate today –
  - In-Person
  - "Viewing" using the Internet
  - "Listening" using the Toll-free Teleconference
- Please use the Microphone when speaking

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**For those participating remotely ...**

- Out of respect for other listeners:
  - Please mute your phone (\*6)
  - Don't forget to un-mute (\*6) to ask your question

**For everyone who asks a question...**

- Please state your name, organization, and your question for the panel

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**Day 2 Morning Agenda**  
(Category 2 Meeting)

8:00AM	Opening Remarks
	Program Demonstration Guidance, Credit for Actual Events Exercise Guidance Structure, REP Program Administration Offsite Plan Updates (FEMA, NRC, OROs, and Industry Representatives)
	Evacuation Time Estimate Updating, Supplement 3 to NUREG-0654/FEMA-REP-1 (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
11:45AM	Break

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**Day 2 Afternoon Agenda**  
(Category 2 Meeting)

1:15PM	ERO Augmentation at Alternative Facilities (FEMA, NRC, OROs, and Industry Representatives)
	Onsite Protective Actions (FEMA, NRC, OROs, and Industry Representatives)
	Emergency Plan Change Process (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
5:00PM	Day 2 Recap (FEMA, NRC, OROs, and Industry Representatives)
5:30PM	Adjourn

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**Program Demonstration Guidance**



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**Program Demonstration Guidance**

Structure

- Exercises and other activities
- Exhibit III-2: Federal Evaluation Process Matrix
- Documenting Exercises
- Exercise Assessment Areas



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**Program Demonstration Guidance**

New/Revised Criteria

- 3.a.1. and 3.b.1.
- 6.a.1. and 6.b.1.

Implementation/Exercise Cycle Requirements

- Evaluated once every 8 years
- 1.b.1. Facilities
- 5.a.3. Back up route alerting



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**Credit for Actual Events**



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**Credit for Actual Events**

New/Revised Guidance

- As part of the HSEEP process, FEMA supports OROs seeking to combine multiple requirements into fewer total exercises. FEMA will consider granting REP Program exercise credit to OROs for their participation in a response to a real-world incident.



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**Credit for Actual Events**

Actions/Deliverables

- Documentation to support performance of specific criteria
- A request for credit will be sent from the ORO to the State and then to the Regional Assistance Committee (RAC) Chair
- RAC Chair decision to REP Program Headquarters for final decision
- Approval and granted exemption
  - Negotiations with RAC Chair will determine whether performance is necessary in upcoming exercise



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### Credit for Actual Events

Implementation/Exercise Cycle Requirements

- Documentation is needed
- For criterion that may not be so easily documented a FEMA REP Site Specialist may be present to evaluate



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### Questions on this topic?

- If you're in the room, pass in a card with your name and organization on it
- If you're on the phone, please tell the Phone Moderator your name and organization

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### Evacuation Time Estimate Updating

New/Revised Requirements

- Periodic Updates
- NRC Review for Completeness
  - 6 Months Prior to Use
- Annual Population Review
  - 25% or 30 minutes

Actions/Deliverables

- ETE Update Based on 2010 Census
- Method for Obtaining Annual Population Estimates
- Documented Annual Population Review

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**Evacuation Time Estimate Updating**

Implementation

- 365 Days From Later of Census Data Availability or December 23, 2011: ETE Update
- Annually (365 Days or Less): Population Review

Review

- NRC Headquarters Review of Updates

Guidance

- NUREG/CR-7002

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**NUREG-0654/FEMA-REP-1, Rev.1**

**Supplement 3**

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**Supplement 3 to NUREG-0654**

New/Revised Requirements

- PAR Development Using NRC-Approved and Updated ETEs
- Providing ETEs to Offsite Agencies

Actions/Deliverables

- Updated PARs and PAR Procedures

Implementation

- After 180-Day Period in Appendix E, Section IV.4

Inspection

- IP 71114.05

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 **USNRC**  
U.S. Nuclear Regulatory Commission  
Protecting People and the Environment

### Supplement 3 to NUREG-0654

Guidance

- Site-Specific PARs and Decision Logic
- Staged Evacuation
- General Emergency and Severe Accidents
- Precautionary Protective Actions
- Expansion of Initial PARs
- Rapidly Progressing Events
- Public Information and Emergency Messaging
- Development Tool

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### Supplement 3

New/Revised Guidance

- Onsite-offsite Protective Action Recommendation coordination
- Offsite emergency messaging guidance for OROs

Actions/Deliverables

- OROs work closely with licensees to develop coordinated protective action procedures
- OROs submit plan/procedure updates to FEMA for review

 **FEMA**

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### Supplement 3

Implementation/Exercise Cycle Requirements

- Revisions to the licensee's protective action recommendation procedures are due to be completed.
- Once approved by and FEMA and the NRC, OROs and licensees will be evaluated against these plans/procedures updates in the next upcoming exercise.

 **FEMA**

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**Questions on this topic?**

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**Opportunity  
For  
Public Participation**

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**The morning session for the  
implementation forum has ended**

**We will resume at 1:15PM**

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**Day 2 Afternoon Agenda**  
(Category 2 Meeting)

1:15PM	ERO Augmentation at Alternative Facilities (FEMA, NRC, OROs, and Industry Representatives)
	Onsite Protective Actions (FEMA, NRC, OROs, and Industry Representatives)
	Emergency Plan Change Process (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
5:00PM	Day 2 Recap (FEMA, NRC, OROs, and Industry Representatives)
5:30PM	Adjourn

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**ERO Augmentation at Alternative Facilities**

New/Revised Requirements

- Multiple Facilities and Accessibility
- Capabilities (Communications, Offsite Notifications, and Engineering Assessment)

Actions/Deliverables

- Facilities Identified and Equipped
- Capabilities Addressed
- Personnel Awareness/Training/Drills

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**ERO Augmentation at Alternative Facilities**

Implementation

- June 20, 2012: Staging Area and Communications
- December 23, 2014: Remaining Capabilities

Inspection

- IP 71114.03 and 07

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### ERO Augmentation at Alternative Facilities

Guidance (NSIR/DPR-ISG-01)

- Accessible Location (Outside OCA, < 30 Miles)
- Communications (EOF, Control Room, and Site Security)
- Offsite Notifications (15-Minute Capability)
- Engineering Assessment (Repair Team Preparation)
- Additional Capabilities for Consideration
  - Event Classification
  - Additional Communications and Access to Plant Data

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### Questions on this topic?

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### Onsite Protective Actions

New/Revised Requirements

- Ability of Site Personnel to:
  - Perform Reactor Shutdown
  - Implement Emergency Plan
- Protection for Non-Responders

Actions/Deliverables

- Security Event Response Procedure(s)
  - Protective Action Decision-Making Tool
- Implementing Processes In Place
- Personnel Awareness/Training

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### Onsite Protective Actions

Implementation

- June 20, 2012: Onsite Protective Actions

Inspection

- IP 71114.07

Guidance

- Range of Protective Actions (NSIR/DPR-ISG-01)
- Response Strategies for Potential Aircraft Threats (Regulatory Guide 1.214)

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### Questions on this topic?

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### Emergency Plan Change Process

New/Revised Requirements

- Definition of Terms
- Reduction in Effectiveness
- License Amendment Process
  - EAL Scheme Change

Actions/Deliverables

- Revised Change Procedures
- Staff Training
- Revised Change Documentation Submittals

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 **USNRC**  
U.S. Nuclear Regulatory Commission  
Protecting People and the Environment

### Emergency Plan Change Process

Implementation

- February 21, 2012: Change Documentation Submittals

Review

- NRC Headquarters Review of Changes

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 **USNRC**  
U.S. Nuclear Regulatory Commission  
Protecting People and the Environment

### Emergency Plan Change Process

Guidance (Regulatory Guide 1.219)

- Definitions
- Emergency Planning Functions
- Changes Requiring/Not Requiring Prior NRC Approval
- Change Submittals, Documentation, and Record Retention

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 **USNRC**  
U.S. Nuclear Regulatory Commission  
Protecting People and the Environment

 **FEMA**

### Questions on this topic?

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 **USNRC**  
United States Nuclear Regulatory Commission  
*Protecting People and the Environment*

 **FEMA**

**Opportunity  
For  
Public Participation**

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 **USNRC**  
United States Nuclear Regulatory Commission  
*Protecting People and the Environment*

 **FEMA**

**Day 2 Recap**

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 **USNRC**  
United States Nuclear Regulatory Commission  
*Protecting People and the Environment*

 **FEMA**

**Adjourn Day 2**

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**Emergency Preparedness  
Final Rule And Guidance  
Implementation Forum**

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**Day 3 Agenda  
(Category 2 Meeting)**

8:00AM	Opening Remarks
	Emergency Declaration Timeliness (FEMA, NRC, OROs, and Industry Representatives)
	On-Shift Staffing Analysis (FEMA, NRC, OROs, and Industry Representatives)
	Opportunity for Public Participation
11:45AM	Day 3 Recap/Forum Closing Remarks (FEMA, NRC, OROs, and Industry Representatives)
12:00PM	Adjourn

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**Overview**

- Emergency Egress
- Restrooms
- Cell phones and pagers

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**Meeting Purpose**

- Explain expectations for implementation of the final rule and guidance documents
- Answer questions related to implementation to provide clarification

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**Participation**

- Category 2 Meeting
  - Primary focus is for licensees and State, local, Tribal governments to gain clarity on how to implement the rule and guidance changes
  - Dedicated times on the agenda for others to ask questions

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**Participation**

- Multiple ways to participate today –
  - In-Person
  - "Viewing" using the Internet
  - "Listening" using the Toll-free Teleconference
- Please use the Microphone when speaking

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**For those participating remotely ...**

- Out of respect for other listeners:
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  - Don't forget to un-mute (\*6) to ask your question

**For everyone who asks a question...**

- Please state your name, organization, and your question for the panel

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**Emergency Declaration Timeliness**

New/Revised Requirements

- 15-Minute Emergency Declaration Capability
- Prompt Declaration
- Implementation of Response Actions

Actions/Deliverables

- Implementing Procedure Revisions
- Training Program Revisions
- ERO Training

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**Emergency Declaration Timeliness**

Implementation

- June 20, 2012

Inspection

- IP 71114.01

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### Emergency Declaration Timeliness

Guidance (NSIR/DPR-ISG-01)

- 15-Minute Start/Stop
- "Plant Operator"
- Indication/Alarm Validation
- Analysis Results
- Prompt Declaration
- Offsite Notification Capability
- EAL Threshold Duration
- Delayed Declaration

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### Questions on this topic?

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- If you're on the phone, please tell the Phone Moderator your name and organization

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### On-Shift Staffing Analysis

New/Revised Requirements

- On-Shift Staffing Analysis

Actions/Deliverables

- Staffing Analysis
- Incorporation in Emergency Plan
- Corrective Actions for Gaps

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**On-Shift Staffing Analysis**

Implementation

- December 24, 2012: Staffing Analysis Completion
- 30 Days After Analysis: Compensatory Actions for Gaps
- 24 Months After Analysis: Long-Term Corrective Actions

Inspection

- IP 71114.03

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**On-Shift Staffing Analysis**

Guidance (NSIR/DPR-ISG-01)

- Minimum Events
  - Design Basis Accidents (DBAs) Resulting in Emergency Declaration
  - General Emergency with Release
  - Station Design Basis Threat (DBT)
  - Aircraft Probable Threat
  - Control Room Fire with Evacuation and Remote Shutdown
- Additional Site-Specific Events
  - Station Blackout
  - Appendix R Fire
  - Severe Accident Management Guidelines (SAMGs)

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**On-Shift Staffing Analysis**

Guidance (Continued)

- Detailed Analysis (NEI 10-05)
- On-Shift Staffing per Emergency Plan
- Multi-Unit Sites/Events
- All On-Shift Positions Evaluated
- NUREG-0654, Table B-1 Functions and Tasks

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**Questions on this topic?**

- If you're in the room, pass in a card with your name and organization on it
- If you're on the phone, please tell the Phone Moderator your name and organization

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**Opportunity  
For  
Public Participation**

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**Day 3 Recap  
Forum Closing Remarks**

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 **USNRC**  
U.S. Nuclear Regulatory Commission  
*Protecting People and the Environment*

 **FEMA**

**Adjourn Day 3**

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 **FEMA**

**Break**

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