



FEMA

MAY 07 2012

Mr. Brian M. Satula
Administrator
Wisconsin Emergency Management
2400 Wright Street
P.O. Box 7865
Madison, Wisconsin 53707-7865

Dear Mr. Satula:

This is to inform you of the U.S. Department of Homeland Security/Federal Emergency Management Agency's (DHS/FEMA) identification of a Deficiency finding for Manitowoc County under Criterion 5.a.1. – Activation of the Prompt Alert and Notification System during the Point Beach Nuclear Power Plant's (PBNP) Radiological Emergency Preparedness (REP) Full Participation Plume Exposure Pathway Exercise, conducted on April 17, 2012. This issue was presented to the PBNP Exercise participants during the Participants' Meeting on April 20, 2012.

A Deficiency is defined in DHS/FEMA REP Program Manual, Page III-21, dated October 2011, as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

A Protective Action Decision (PAD) was made by Manitowoc County officials to evacuate residents in Sub-Area 5, including activation (simulated) of county sirens at 1150 hours and broadcast (simulated) of an Emergency Alert System (EAS) message through Radio Station WOMT at 1152 hours. Radio Station WOMT did not air the EAS message because the radio station was not notified of the exact time the county sirens would be activated as stipulated by the county plans.

At 1210 hours, a release (simulated) of radioactive materials from the PBNP occurred.

A subsequent PAD was made by Manitowoc County officials at 1257 hours with decisions to activate county sirens at 1310 hours and broadcast of an EAS message through Radio Station WOMT at 1312 hours. This EAS message was aired by the radio station.

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A total of one hour and 22 minutes elapsed between the initial activation of county sirens and the first EAS message that was broadcast (simulated) by Radio Station WOMT. Not having notified the residents to evacuate after the initial siren activation delayed their departure, thereby subjecting them to unnecessary additional exposure.

The Health & Safety of the General Public was potentially compromised during the PBNP Exercise. The Deficiency resulted from the failure of the Manitowoc County Public Information Officer (PIO) to provide the EAS Radio Station (WOMT) the time that county sirens were to be activated, per Manitowoc County Emergency Operations Plan (EOP), Annex I - Part 2.V - Public Information Officer Nuclear Power Plant Incident Checklist – EAS Message Selection and Broadcast SOP. Notification to Radio Station WOMT of the exact time that county sirens would be activated was necessary in order for the radio station to commence dissemination of an evacuation message for residents in Sub-Area 5 of the PBNP 10-mile EPZ.

More detailed information regarding Criterion 5.a.1 performance is included in an enclosed narrative synopsis of events surrounding the issuance of the Deficiency.

In accordance with 44 CFR 350.9(d) and DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with the U.S. Nuclear Regulatory Commission (NRC).

In accordance with DHS/FEMA rules and regulations and the potential impact this finding has on public health and safety, this issue should be corrected within 120 days after the exercise date through appropriate remedial actions, including training, exercises, drills, or other actions.

Please coordinate with this office regarding a Schedule of Corrective Actions (SCA), including the date, time and identification of those participating in any remedial exercises. A response to this letter, including a SCA is requested ASAP, but no later than May 7, 2012.

A copy of this letter has been forwarded to Headquarters DHS/FEMA, the NRC Headquarters, and NRC Region III.

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

Sincerely,



Andrew Velasquez III
Regional Administrator

cc: Headquarters DHS/FEMA
NRC Headquarters
NRC Region III

Enclosures (1)

EVALUATION AREA 5: Emergency Notification and Public Info

Sub-element 5.a - Initial Alert & Notification

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

NARRATIVE SUMMARY FOR CRITERION: 5.a.1

The Point Beach Nuclear Plant (PBNP) Radiological Emergency Preparedness Exercise was conducted on Tuesday, April 17, 2012.

Key personnel at the Manitowoc County Emergency Operations Center (EOC) and in the Manitowoc County Joint Dispatch Center located at 1024 South 9th Street, Manitowoc, Wisconsin coordinated and accomplished sounding of the primary alert system (sirens) in a timely manner following each of the two decisions to activate the system.

The first notification to the public, which contained a Protective Action Decision (PAD) and instructions to the public to evacuate, although developed appropriately, and in a timely manner, was never broadcast. A notification containing information and instructions was provided to the public following the second activation of the alerting system.

Activities undertaken by key personnel at the Manitowoc County EOC related to the public notification process were directed and coordinated by the County Board Chairperson, Manitowoc County Emergency Management Director (EMD), Manitowoc County Dispatcher and Public Information Officer (PIO), who worked in conjunction with the State of Wisconsin and Kewaunee County.

The PAD was based on a recommended utility Protective Action Recommendation to evacuate all sectors out to 2-miles and evacuate downwind sectors out to 5-miles. The PAD was issued in a timely manner in accordance with the Manitowoc County's Emergency Operations Plan.

The decision to activate the public alert and notification system was made at the General Emergency (GE) Emergency Classification Level (ECL) at 1124 hours. Following the GE ECL, Manitowoc County in conjunction with the State of Wisconsin and Kewaunee County, made their first PAD which recommended the evacuation of all sectors out to 2-miles and 5-miles downwind of the PBNP (Sub-Area 5).

In conjunction with the State of Wisconsin and Kewaunee County personnel, an agreement was reached that the primary alert system would be activated at 1150 hours and the Emergency Alert System (EAS) message broadcast at 1152 hours. The message was read by the Manitowoc County PIO and recorded by Radio Station WOMT for broadcast. The EAS message read was clear and precise, and provided appropriate instructions.

In accordance with current plans and procedures, dated February 2009, the Manitowoc County PIO was to notify Radio Station WOMT of time the Manitowoc County sirens would be activated. This would ensure that Radio Station WOMT staff did not air the EAS message prior to the sirens being activated. The EAS message provided to Radio Station WOMT by the Manitowoc County PIO, which contained a PAD and instructions to the public to evacuate was not broadcast (simulated), due to the WOMT Staff not receiving a call with the siren activation time.

At 1210 hours, weather conditions were reported as, wind speed five miles per hour from 101 degrees and a simulated release of radiological materials occurred. A decision to activate the primary alert system a second time was made during a GE ECL, as a result of the simulated release of radiological materials.

At 1257 hours, Manitowoc County, in conjunction with the State of Wisconsin and Kewaunee County made their second PAD which recommended the evacuation of all sectors out to 5-miles and to evacuate sectors M, N, P, and Q out to 10-miles of the PBNP (Sub-Areas 5, 10SW, 10W, 10NW, 10N). The PAD was issued in a timely manner in accordance with the Manitowoc County's Emergency Operations Plan. In coordination with State of Wisconsin and Kewaunee County personnel, an agreement was reached that the sirens would be activated at 1310 hours, using the primary alert system.

At 1308 hours, Radio Station WOMT was notified by a supervisor in the Manitowoc County Joint Dispatch Center, that the Manitowoc County sirens would be activated in one minute and 42 seconds. The EAS message was then read by the Manitowoc County PIO and recorded by Radio Station WOMT for broadcast.

The EAS message broadcast (simulated) was clear and precise and contained all necessary information. The EAS message was broadcast (simulated) to the public by WOMT, at 1312 hours. One hour and 22 minutes transpired between the first activation of the sirens and the EAS message being disseminated to the public. Consequently, this delayed the evacuation of the public in Sub-Area 5 due to the initial EAS message not being broadcast. This could have lead to potentially increasing individuals' exposure to the simulated release of radiological materials.

All messages provided to Radio Station WOMT from the Manitowoc County EOC were recorded for broadcast. The computerized system at Radio Station WOMT was set up to broadcast the last message received until replaced by another message, or cancelled.

All messages identified the Manitowoc County Official authorizing the message, indicated that there was an emergency situation at the PBNP, referred listeners to previously distributed Emergency Informational Calendar, and advised listeners to stay tuned to the EAS station for additional information as it becomes available.

Manitowoc County Officials did not effectively demonstrate the capability to notify (simulated) the general public of appropriate instructions.

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CONDITION (describe the inadequacy):

The Health & Safety of the general public was potentially compromised during the PBNP Exercise. The Manitowoc County Public Information Officer did not provide the EAS Radio Station (WOMT) the time that Sirens were to be activated, per Manitowoc County Emergency Operations Plan, Annex I - Part 2.V - Public Information Officer Nuclear Power Plant Incident Checklist – EAS Message Selection and Broadcast SOP, in order for the station to commence dissemination of an evacuation message for the general public in Sub-Area 5 of the PBNP 10-mile EPZ.

POSSIBLE CAUSE (what is responsible):

The Manitowoc County PIO may not have utilized their standard operating procedures checklist regarding specific instructions to contact the radio station.

REFERENCE (cite the specific NUREG-0654 element, regulation, etc.):

NUREG-0654/FEMA, REP.1, REV.1, Evaluation Criteria E.5 and E.6.

EFFECT (what resulted, or could have resulted, from this issue):

The delay of the initial EAS message not being broadcast could have resulted in increased radiation exposure of simulated radioactive materials to the general public in Sub-Area 5.

RECCOMENDATION

Manitowoc County and Radio Station WOMT need to develop, implement, and train staff on procedures to ensure EAS messages are broadcast to the public in a timely manner following the activation of the primary alert system (sirens).