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Cc: [West, Steven](#); [Kunowski, Michael](#); [Shear, Gary](#)
Subject: PB Graded Exercise
Date: Monday, May 21, 2012 10:57:10 AM
Attachments: [Point Beach Graded Exercise ED Error.doc](#)

Good Morning Steve,

As you may recall during the Point Beach graded exercise that you and Cindy participated in we had some communication issues in the EOF that resulted in the Emergency Director changing a Protective Action Recommendation from Evacuate to Shelter. This was an error on the part of the Emergency Director that was identified in the station critique.

I understand that this Thursday a SERP will be held at Region 3 to determine if this issue is greater than green. Last Friday our fleet Emergency Preparedness Manager, Don Mothena, provided some of our perspective on the error to the inspector, Mr. Bob Jickling, so I wanted to ensure you also had this information (attached) and was hoping it could be factored into the determination.

The key point is that we believe the involved station procedure could have and should have been implemented as written to come to a correct conclusion. As described in the attached paper, the principal reason for the error is that the emergency director (ED) failed to seek to understand the narrow context of the county's use of the term "evacuation impediment" compared to the broader intended context of our use of this term in the applicable station emergency procedure. If the ED had not made this error, the impediment the county was reporting would have been determined to be finite and road based, and the procedure should have been implemented as written, not resulting in a shelter PAR being issued over the evacuation PAR.

The key action taken to address this issue was to provide the site EDs with training on the error that occurred and the need to understand differences that stakeholders might have in using certain key words such as "evacuation impediment." As a self-improving culture we recognize that procedures form a barrier that can reduce the frequency and consequence of human errors so, as is usually the case with such errors, we have also reviewed and strengthened the associated station procedure so that it can serve as a more effective barrier in the future also.

Thanks,

Larry

WHITE PAPER
NextEra Energy Point Beach, LLC
2012 NRC/FEMA Evaluated Exercise
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OBJECTIVE

Provide information to the Nuclear Regulatory Commission (NRC) to demonstrate that the issuance of a shelter Protective Action Recommendation (PAR) was a performance weakness primarily the result of actions and decisions by the Emergency Director (ED). This would not result in a Failure to Comply (FTC) with a regulatory requirement, and therefore no finding.

SUMMARY

A performance weakness was identified and critiqued by the Point Beach (PB) Emergency Planning (EP) personnel during the conduct of the 2012 NRC/FEMA Evaluated Exercises on April 17, 2012. This does not amount to a FTC with a regulatory requirement.

Specifically, when presented with an “impediment to evacuate” inject by the County that was re-emphasized by the NRC participant, the PB Emergency Director (ED) interpreted the impediment in accordance with the plant procedure definition of that term as significant to preclude or impede evacuation. The plant’s use of the term as significant to preclude or impede evacuation is distinguished from the County’s use of that term which is intended to convey a finite, road based impediment. This was a miscommunication that was exacerbated by the failure of the PB ED (and ED staff) to seek to understand the context of the use of the word impediment by the County. If the ED had not made that error, the impediment would have been determined to be finite and road based, and the procedure could have been implemented as written, not resulting in a shelter PAR being issued over the evacuation PAR.

CORRECTIVE ACTIONS

The decision to make the shelter PAR was recognized by PB during the Exercise and was fully and timely critiqued. In addition, the PB ED’s were provided training on the event and the governing EP procedure was strengthened to serve as a stronger barrier in a similar circumstance. It is important to note that the procedure was enhanced prior to the NRC exit meeting to strengthen the process for protective actions related to sheltering and impediments.

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SUPPORTING POINTS

1. The county uses a definition of impediment from the FEMA REP Program Manual that is finite and road based.
2. The FEMA and county context of impediment is different than that used in NRC guidance and the PB EPIP procedure which is much broader in scale.
3. The ED was not aware of the difference in definition and acted solely on input from the County that the impediment was actually an impediment to evacuate.
4. The ED failed to seek an understanding of the definition used by the County for an impediment as it compared to broad based definition of that term in NRC guidance and in the PB site procedure.
5. The State understood the PB ED's basis for issuing of a shelter recommendation based on an impediment but did not deviate in continuing with the evacuation in progress. The State decision maker was cognizant of the conditions that led PB to issue a shelter recommendation and the regulatory history. It did not encumber his decision making process for offsite protective actions.
6. Similar traffic injects have been part of every FEMA exercise for the last 10 years without the miscommunication of the traffic problem as an impediment and the procedure was executed correctly.
7. Additionally a NRC participant in the EOF brought the "impediment to evacuation" to the attention of the ED adding to its relative importance and elevated the impediment injects. That contributed to the failure by the ED to seek to understand the definition of impediment being used.
8. The procedure was enhanced prior to the exit meeting to strengthen the process for protective actions related to sheltering and impediments.

CONCLUSION

The overall exercise accomplished one of its purposes in providing performance opportunities to develop key skills and identify weaknesses in performance by the emergency response organization. Again, the decision to issue a shelter PAR was primarily the result of a performance issue by the ED. This would not result in a FTC with a regulatory requirement, and therefore no finding.