United States Nuclear Regulatory Commission Official Hearing Exhibit
In the Matter of: Entergy Nuclear Operations, Inc.
(Indian Point Nuclear Generating Units 2 and 3)
ASLBP #: 07-858-03-LR-BD01
Docket #: 05000247 | 05000286
Exhibit #: CLE000016-00-BD01
Identified: 10/15/2012
Admitted: 10/15/2012
Withdrawn:
Rejected:
Stricken:
Other:

Exhibit CLE000016
Submitted 12/22/11

Federal Emergency Management Agency
**Region II**
**Jacob K. Javits Federal Building**
**26 Federal Plaza, Room 1307**
**New York, NY 10278-0002**

February 21, 2003

Mr. Edward F. Jacoby, Jr., Director
New York State Emergency Management Office
Building #22, Suite 101
1220 Washington Avenue
Albany, New York 12226-2251

RE: Radiological Emergency Preparedness Program – Indian Point Energy Center
Response Due: May 2, 2003

Dear Mr. Jacoby:

Please find enclosed five copies of the Final Exercise Report for the Indian Point 2 Full-Participation Plume Exposure Pathway conducted September 24, 2002 (Attachment A). The State of New York and the counties of Westchester, Rockland, Orange and Putnam in New York, and Bergen in New Jersey participated during the exercise.

There were no Deficiencies and thirteen Areas Requiring Corrective Action (ARCAs) identified as a result of this exercise. There are also six unresolved ARCAs from the November 2000 plume exercise and one ARCA that remains unresolved from the May 1999 ingestion pathway exercise. Twenty-two prior ARCAs were adequately demonstrated and are now closed.

In addition to the Exercise Report, please find attached an update of our review of the 2000 plans for the State and the four risk counties including a review of the plan changes submitted in 2002 (Attachment B). The attached identifies all the plan issues previously raised by FEMA in past reviews and cross-references them against the State's independent. We have included additional information on the status of each plan issue identified. As you are aware, the State agreed to update all plans prior to the September 24, 2002, exercise. It is important to note that significant planning items have yet to be addressed almost five months after the September exercise.

AX45

No exercise finding rose to the level of a Deficiency as defined in 44 C.F.R. Part 350. However, based on the absence of corrected and updated plans from the counties and State, as outlined in the enclosures, at this time, I am not able to provide a final recommendation of "reasonable assurance" that the county and State officials can take appropriate measures.

The primary concern of FEMA is the health and safety of the public. The State and FEMA, as demonstrated by our efforts and cooperation in the REP Program over the last 20 years, have always worked closely in resolving any issues regarding emergency preparedness. If the State of New York, as previously requested, can provide updated plans on or before May 2, 2003, then this decision will be re-evaluated. If, in the event the State is unable to do so, in my capacity as Acting Regional Director, I will proceed with advising FEMA headquarters that I cannot provide a recommendation of reasonable assurance that the State and local plans are adequate to protect the health and safety of the public. In this event, FEMA headquarters would notify the Nuclear Regulatory Commission (NRC) and the Governor of New York State of the decision.

During this process, if initiated, you will have an opportunity to provide a plan for corrective action with a negotiated completion date from FEMA. Failure to comply would result in formal notification to the NRC that "reasonable assurance" cannot be issued. In any event, Region II and our FEMA headquarters will assist the State in addressing all planning issues.

Please feel free to contact me for further information.

Sincerely,

Joseph Picciano
Acting Regional Director

Attachments

ATTACHMENT A

# Exercise Report

# INDIAN POINT 2 NUCLEAR POWER STATION

| | |
|---|---|
| Licensee: | ENTERGY |
| Exercise Date: | September 24, 2002 |
| Report Date: | February 21, 2003 |

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**FEDERAL EMERGENCY MANAGEMENT AGENCY**
**REGION II**

**26 Federal Plaza**
**New York, New York 10278**

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# I. EXECUTIVE SUMMARY

On September 24, 2002, the Federal Emergency Management Agency (FEMA) evaluated an exercise in the plume exposure pathway around the Indian Point 2 Nuclear Power Station. Specifically, the purpose of the exercise was to assess the level of State and local preparedness in responding to a radiological emergency in the 10 mile Emergency Planning Zone (EPZ). This exercise was held in accordance with FEMA's policies and guidance concerning the exercise of State and local radiological emergency response plans (RERP) and procedures.

FEMA wishes to acknowledge the efforts of the many individuals in New York State; Westchester, Rockland, Orange, and Putnam Counties; and Bergen County, New Jersey who participated in this exercise.

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. The cooperation and teamwork of all participants were evident during this exercise.

This report contains the final evaluation of the biennial exercise and the evaluation of the following out-of-sequence activities in Orange, Putnam, Rockland and Westchester counties: Reception Centers; Congregate Care Centers; Emergency Worker Personnel Monitoring Centers; General and Special Population Bus Companies; School Bus Companies; Traffic Control Points; School Interviews; Medical Drills and Siren Tests.

**Exercise Results**

The State and local organizations, except where noted in this report, satisfactorily demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. While no Deficiencies were identified during the exercise, thirteen (13) Areas Requiring Corrective Action (ARCAs) were identified and are discussed in more detail in this report. Seven of these involved the Joint News Center and the provision of information to the media and the general public. The remaining were county operational ARCAs.

In addition, twenty-one ARCAs from the previous exercise have been resolved; thirteen were resolved either immediately (at the time of demonstration) or on follow-up before December 31, 2000. One ARCA, concerning dose assessment at the State EOC, was resolved at the full-scale exercise for the Nine Mile Point plant on December 4, 2001. Five ARCAs from the November 2000 plume phase exercise and one ARCA from the May 1999 ingestion exercise remain unresolved. The prior ARCAs that either were or were not resolved at the September 2002 exercise are described in this report.

**Planning Issues**

FEMA Region II staff, assisted by the Regional Assistance Committee (RAC), composed of

representatives of 11 federal agencies, performed a review of the State and county Radiological Emergency Response Plans and procedures for Indian Point. The results of that review were provided to the State on January 15, 2002. This was followed up with a letter dated December 3, 2002, which summarized remaining concerns and the State's commitment to take corrective action. Although the State and counties have responded to a number of FEMA's concerns with the plans as described in the plan review, there remain weaknesses in the plans. Some of these concerns were included in the State's own draft report "Review of Emergency Preparedness at Indian Point and Millstone"1 (the State Report). While FEMA's review is more comprehensive, the State Report did validate a number of our previous findings. Moreover, we value many of the findings in the State Report and understand the concerns it generated among State and local officials surrounding the facility. It should be noted that all of the planning findings in the State Report were previously raised by FEMA, and the State and counties have previously agreed to correct the weaknesses or to provide missing information. FEMA's updated plan review "Reviews of the Radiological Emergency Response Plans for the State of New York, and the Indian Point Counties" (based on the State and county 2002 plans) includes similar planning issues raised by the State in its own report. This review is provided under separate cover and includes further comment on the State Report and related information. Among the issues raised in FEMA's updated plan review, the most significant outstanding planning issues include:

1. Neither the State nor the counties have submitted their *Letters of Agreement* for FEMA review in order to determine the availability of resources needed by the counties in event of an incident at the plant.

2. *The Joint News Center Procedures and Public Education Workplan*, which is the basic procedure for dissemination of information to the public during a response to an emergency at the plant, is inadequate and continues to interfere with performance, as noted during both the 2000 and 2002 exercises.

3. The plans do not yet have the information from the *Updated Evacuation Time Estimates* (ETE) that have been prepared to reflect new demographics as well as shadow evacuation. Without the updated ETEs, the plans do not reflect the latest information on the time(s) it would take to evacuate the population of an emergency response planning area under various conditions (i.e., time of day, day of week, time of year, weather conditions, etc

4. While the procedures for schools in the plans are adequate, the individual school district, pre-school and day care center plans also need to be submitted to FEMA for review.

**New York State Report Findings**

On August 1, 2002, Governor George Pataki announced that James Lee Witt Associates (JLWA) would conduct a comprehensive and independent review of emergency preparedness around the

1 "Review of Emergency Preparedness at Indian Point and Millstone – Draft," James Lee Witt Associates, LLC, January 10, 2003.

Indian Point Energy Center and that portion of New York that is near the Millstone Nuclear Power Plant located in Connecticut. On January 10, 2003, a draft report entitled "Review of Emergency Preparedness at Indian Point and Millstone" was released by JLWA for public comment. Comments on this draft State report were to be submitted by February 7, 2003.

FEMA has reviewed the draft State report and prepared written responses to the major findings contained in the report. FEMA believes that the draft State report raises a number of issues that should be considered for enhancing the level of preparedness in the communities surrounding the Indian Point Energy Center. These include better education of the public, more training of offsite responders and improved emergency communications. Some of these issues should be evaluated for their applicability program-wide. However, FEMA also believes that a number of issues raised by the state report are not supported by FEMA's own exercise evaluations, plan reviews and knowledge of the REP Program.

FEMA's detailed responses to these issues can be found in the second attachment to the letter to the Director of the New York State Emergency Management Office entitled "Reviews of the State and County Radiological Emergency Response (REP) Plans for the Indian Point Energy Center and Comments on the REP Program, Planning and Exercise Issues Raised by Others." FEMA will obtain and review the final state report when it is released to ensure that any revisions that could affect our final determination are taken into consideration.

**Out-of-Sequence Activities**

Numerous out-of sequence activities were demonstrated and evaluated as part of the 2002 exercise for Indian Point. Out-of-sequence activities are demonstrations of facilities and knowledge of procedures that occur out of sequence with the full-scale exercise scenario. The following activities were conducted and evaluated by FEMA personnel in order to develop a better understanding of the level of preparedness:

18 School Interviews
10 School Bus Company Interviews
9 Special Population Bus Company Interviews
8 Congregate Care Centers
4 Reception Centers
4 Emergency Worker Personnel Monitoring Centers
6 Traffic Control Points
4 Medical MS-1 Drills
Full-System Siren Test – March 26, 2002

**Conclusions**

Although, as noted above, no exercise finding rose to the level of a Deficiency as defined under 44 CFR Part 350, at this time, FEMA, in the absence of fully corrected and updated plans for the

counties and State, cannot provide "reasonable assurance" that appropriate measures can be taken in the event of a radiological emergency. However, should the State of New York provide complete plans on or before May 2, 2003, with a schedule of corrective actions to address the exercise issues, then this decision will be re-evaluated. If the State is unable to do so, FEMA will proceed with notification to FEMA Headquarters that assurance cannot be provided regarding the adequacy of the plans to protect the health and safety of the public. At that time, FEMA headquarters would notify NRC and the Governor of the decision.

FEMA and the State of New York and the counties in the emergency planning zone have worked together to assure the safety and health of the public in the event of an incident at Indian Point Energy Center. FEMA anticipates that the planning issues cited above and the exercise issues described in the report will be addressed and resolved in a timely fashion.

## II. INTRODUCTION

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

FEMA Rule 44 CFR 350 establishes the policies and procedures for 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 government participation in joint exercises with licensees.

FEMA's 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 the following Federal agencies with responsibilities in the radiological emergency planning process:

  - U.S. Department of Commerce,
  - U.S. Nuclear Regulatory Commission,
  - U.S. Environmental Protection Agency,
  - U.S. Department of Energy,
  - U.S. Department of Health and Human Services,
  - U.S. Department of Transportation,
  - U.S. Department of Agriculture,
  - U.S. Department of the Interior
  - U.S. Food and Drug Administration, and
  - U.S. Department of Defense.

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

Formal submission of the RERPs for the Indian Point Nuclear Power Station to FEMA Region II by the State of New York and involved local jurisdictions occurred on October 10, 1991. Formal approval of the RERP was granted by FEMA on May 3, 1996, under 44 CFR 350.

A full-scale REP exercise was evaluated on September 24, 2002 by FEMA assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency at the Indian Point 2 Nuclear Power Station. 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 FEMA Region II RAC Chairperson, and approved by the Regional Director.

The criteria utilized in the 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; and

- "Radiological Emergency Preparedness: Exercise Evaluation Methodology," published in the *Federal Register* on September 12, 2001, and revised April 25, 2002.

Section III of this report, titled "Exercise Overview," presents basic information and data relevant to the exercise. This section of the report contains a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

Section IV of this report, titled "Exercise Evaluation and Results," presents detailed information on the demonstration of applicable exercise objectives 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 assessed during this exercise, recommended corrective actions, and the State and local governments' schedule of corrective actions 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.

## III. EXERCISE OVERVIEW

Contained in this section are data and basic information relevant to the September 24, 2002, exercise to test the offsite emergency response capabilities in the area surrounding the Indian Point 2 site. This section of the exercise report includes a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

### A. Plume Emergency Planning Zone Description

The Indian Point Nuclear Power Station's (IPNPS) 10-mile plume pathway EPZ contains portions of four New York State counties: Orange, Putnam, Rockland, and Westchester.

The IPNPS is located on the east bank of the Hudson River about 24 miles north of the New York City boundary line at Indian Point, Village of Buchanan in upper Westchester County, New York. The station is about 0.8 miles southwest of the city of Peekskill, 8.3 miles south of West Point, 1.5 miles northeast of the Lovett Generating Station site, 4.6 miles north of the Bowline Point Generating Station site, and 2.3 miles north of Montrose Point.

The Indian Point Site is accessible by several roads in the Village of Buchanan. Broadway, a two-lane paved road, borders the site to the east and is the primary access road to the site. The Village roads of Bleakley Avenue and First Street enter Broadway across from the eastern site boundary. Additionally, a paved road links the eastern boundary of the site to the plants.

There are no residences within the site boundary. In addition, there are no public highways or railroads that traverse the site area.

The Indian Point Site is surrounded on almost all sides by high ground ranging from 600 to 1,000 feet above sea level. The site is on the east bank of the Hudson River which runs northeast to southwest at this point but turns sharply northwest approximately two miles northeast of the site. The west bank of the Hudson is flanked by the steep, heavily wooded slopes of the Dunderberg and West Mountains to the northwest (elevations 1,086 feet and 1,257 feet respectively) and Buckberg Mountain to the west-southwest (elevation 793 feet). These peaks extend to the west by other names and gradually rise to slightly higher peaks.

The general orientation of this mass of high ground is northeast to southwest. One mile northwest of the site, Dunderberg Mountain bulges to the east; north of Dunderberg and the site, high ground reaching 800 feet forms the east bank of the Hudson as the river makes a sharp turn to the northwest. To the east of the site, peaks are generally lower than those to the north and west. The Spitzenberg and Blue Mountains average about 600 feet in height and there is a weak, poorly defined series of ridges that again run mainly in a north-northeast direction. The river south of the site makes another sharp bend to the southeast and then widens as it flows past Croton and Haverstraw.

The IPNPS is approximately 239 acres in size and contains three pressurized water reactors: Unit 1 (615 MWt, 265 MWe, de-fueled), Unit 2 (2,758 MWt, 873 MWe), and Unit 3 (3,025 MWt, 965 MWe). Indian Point Unit 3 is adjacent to and south of Unit 1 and Unit 2 is to the north of Unit 1. The two operating units, #'s 2 and 3, were designed by the Westinghouse Electric Corporation.

The Indian Point pressurized water nuclear power plants each contain a nuclear reactor and closed loops of pressurized water that remove the heat energy from the reactor core and transfer the energy to a secondary water system that generates steam. The steam, in turn, drives a turbine generator set which produces electric power.

## B. Exercise Participants

The following agencies, organizations, and units of government participated in the Indian Point 2 exercise on September 24, 2002.

**Federal Agencies**

United States Military Academy

**State of New York**

New York State Department of Health
New York State Department of Highways
New York State Department of Social Services
New York State Department of Transportation
New York State Emergency Management Office
New York State Emergency Medical Services Coordinator
New York State Energy Research and Development Authority
New York State Police
New York State Public Service Commission

**Risk Jurisdictions**

**Orange County**

Orange County Attorney
Orange County Department of Health
Orange County Department of Public Works
Orange County Department of Social Services
Orange County Emergency Management Office
Orange County Emergency Medical Services
Orange County Executive
Orange County Radiological Officer
Orange County Public Information Officer
Orange County School Liaison
Orange County Sheriff's Office

**Putnam County**

Putnam County Bureau of Fire and Emergency Medical Services
Putnam County Fire Department
Putnam County Health Department

Putnam County Highway Department
Putnam County Office for the Aging
Putnam County Office of Personnel
Putnam County School District
Putnam County Sheriff's Office
Putnam County Social Services

**Rockland County**

Local Police Departments
Rockland County Department of Health
Rockland County Mental Health
Rockland County Office of the Aging
Rockland County Public Information Office
Rockland School Representative

**Westchester County**

Bureau of Environmental Quality
Bureau of Public Health Protection
City of Peekskill
Civil Air Patrol
Department of Schools
General Services Department
Westchester County Community Mental Health
Westchester County Department of Environmental Facilities
Westchester County Department of Health
Westchester County Department of Parks, Recreation & Conservation
Westchester County Department of Social Services
Westchester County Emergency Management Agency
Westchester County Emergency Medical Services
Westchester County Executive Office
Westchester County Finance Department
Westchester County Fire and Safety
Westchester County Local Emergency Planning Committee
Westchester County Medical Center
Westchester County Office of Emergency Services
Westchester County Police
Westchester County Public Information Office
Westchester Department of Public Works
Yorktown Municipal Police Department

**Support Jurisdictions**

**Bergen County**

Bergen County Office of Emergency Management

**Private/Volunteer Organizations**

American Red Cross
Civil Air Patrol
Nuclear Power Generation Utilities Technical Representative
Orange County Amateur Radio Emergency Services (ARES)/
Radio Amateur Civil Emergency Service (RACES)
Putnam County RACES
Putnam Emergency Amateur Repeater League
Rockland County RACES
Salvation Army
Volunteers from RACES
WABC AM Radio Station
Westchester County RACES

**Out-of-Sequence Activities**

The out-of sequence activities that were demonstrated and evaluated as part of the 2002 exercise for Indian Point are listed below:

**School Interviews**

Orange County

- James O'Neil High School (September 23, 2002)

Putnam County

- Putnam Valley Middle School/High School (May 2, 2002)
- Bonous Montessori (May 23, 2002)
- Garrison U.F.E.S (June 12, 2002)

Rockland County

- Lime Kiln Elementary School (May 28, 2002)
- St. Paul's School (June 10, 2002)
- Clarkstown North Senior High School (September 18, 2002)
- James A. Farley Middle School (September 18, 2002)
- Robin Hill Nursery School (September 18, 2002)

Westchester County

- Buchanan-Verplanck Elementary School (June 10, 2002)
- Croton-Harmon High School (June 12, 2002)
- Hillcrest Elementary School (June 12, 2002)
- West Orchard Elementary School (June 13, 2002)
- Pinesbridge School (June 14, 2002)
- St. Patrick's School (June 14, 2002)
- Briarcliff High School (June 17, 2002)
- Benjamin Franklin Elementary School (June 17, 2002)
- St. Ann's School (June 17, 2002)

**School Bus Company Interviews**

Orange County

- West Point Tours (August 15, 2002)

Putnam County

- Putnam County School District (May 2, 2002)
- Hudson Valley Bus (June 12, 2002)

Rockland County

- Chestnut Ridge (June 11, 2002)
- Clarkstown Central School District (June 12, 2002)
- Haverstraw (June 13, 2002)
- Peter Brega (June 14, 2002)

Westchester County

- Liberty Lines (September 10, 2002)
- Hendrick Hudson School District (September 16, 2002)
- Lakeland Central School District (September 19, 2002)

**Special Population Bus Company Interviews**

Orange County

- West Point Tours (August 15, 2002)

Putnam County

- Mahopac School District (April 18, 2002)
- Haldane School District (June 19, 2002)

Rockland County

- Chestnut Ridge (June 11, 2002)
- Clarkstown Central School District (June 12, 2002)
- Haverstraw (June 13, 2002)
- Peter Brega (June 14, 2002)

Westchester County
- Liberty Lines (September 10, 2002)
- Royal Coach (September 10, 2002)

**Congregate Care Centers**

Orange County
- Twin Towers Middle School (August 20, 2002)

Putnam County
- George Fisher Middle School (July 30, 2002)

Rockland/Bergen Counties
- Fairleigh Dickinson University (September 4, 2002)
- Bergen Community College (September 9, 2002)
- Ramapo College (September 9, 2002)

Westchester County
- Westchester Community College (August 14, 2002)

**Reception Centers**

Orange County
- Heritage Middle School (August 1, 2002)

Putnam County
- Carmel High School (July 30, 2002)

Rockland County
- Suffern High School (August 19, 2002)

Westchester County
- Westchester Community College (August 14, 2002)

**Emergency Worker Personnel Monitoring Centers**

Orange County
- Board of Cooperative Educational Services (BOCES) (September 19, 2002)

Putnam County

- Carmel Fire Department (April 30, 2002)

Rockland County

- County Sewer District (June 25, 2002)

Westchester County

- Fire Training Center (July 10, 2002)

**Traffic Control Points (Conducted during the exercise, but out-of-sequence)**

- Orange County Sheriff's Department (September 24, 2002)
- Putnam County Sheriff's Department (September 24, 2002)
- Rockland County – Clarkstown (September 24, 2002)
- Rockland County – Stony Point (September 24, 2002)
- Westchester County – County Police (September 24, 2002)
- Westchester County – Yorktown Police (September 24, 2002)

**Medical MS-1 Drills**

- Putnam Hospital (May 15, 2002)
- Westchester Medical Center (June 11, 2002)
- Cornwall Hospital (October 24, 2001)
- Good Samaritan Hospital (May 4, 2001)

**Full-System Siren Tests** – March 26, 2002.

## C. Exercise Timeline

Table 1, on the following page, presents the time at which key events and activities occurred during the Indian Point Exercise on September 24, 2002. Also included are times notifications were made to the participating jurisdictions/functional entities.

## Table 1. Exercise Timeline
### INDIAN POINT 2 – September 24, 2002

| Emergency Classification Level or Event | Time Utility Declared (RECS) | Time That Notification Was Received or Action Was Taken | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | NY State EOC | JNC | EAS @ WABC | Putnam Co. EOC | Rockland Co. EOC | Westchester Co. EOC | Orange Co. EOC | Bergen Co. EOC | EOF |
| **Alert** | 0837 | 0845 | - | - | 0844 | 0837 | 0845 | 0844 | 0911 | 0845 |
| **Site Area Emergency** | 1126 | 1135 | 1141 | - | 1133 | 1136 | 1129 | 1132 | 1149 | 1126 |
| **General Emergency** | 1222 | 1228 | 1230 | - | 1228 | 1222 | 1228 | 1226 | 1250 | 1222 |
| **Simulated Rad. Release Started** | 1329 (EOF) or 1349 (NYS) | 1358 | 1416 | - | 1357 (EOF Facilities) 1400 (RECS) | 1403 | 1345 | 1359 | 1441 | 1335 data 1355 announced |
| **Simulated Rad. Release Terminated** | 1513 | 1521 | 1546 | - | 1513 | 1526 | 1521 | 1520 | 1540 | 1514 |
| **Facility Declared Operational** | | 0935 | 0953 | N/A | 0928 | 0933 | 0948 | 1000 | 0910 | 0905* 0945** |
| **Declaration of State of Emergency by State** | | 1125 | 1132 | - | 1130 | 1130 | 1129 | 1120 | - | - |
| **Declaration of State of Emergency by County** | | - | - | - | 1130 | - | - | - | - | - |
| **Exercise Terminated** | | 1603 | 1607 | | 1603 | 1603 | 1605 | 1605 | 1603 | 1602 |
| **Early Precautionary Actions:** | | 0940 | | | | | | 1007 | | |
| **Closing All Schools** | | | | | 1101 | | | | | |
| **Evacuation of School Children** | | | - | - | 1103 | - | - | | - | - |
| **Dairy Animals on Stored Feed/Covered Water** | | 1111 | | | 1119 | | | | | |
| **1st Notification Sequence** | | | | | | | | | | |
| **Siren:** | | 1011 | | | 1011 | 1011 | 1011 | 1010 | - | 1011 |
| **EAS:** | | 1014 | 1014 | 1014 | 1014 | 1014 | 1014 | 1014 | | |

## Table 1. Exercise Timeline
### INDIAN POINT 2 – September 24, 2002

| Emergency Classification Level or Event | Time Utility Declared (REGS) | Time That Notification Was Received or Action Was Taken | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | NY State EOC | JNC | EAS @ WABC | Putnam Co. EOC | Rockland Co. EOC | Westchester Co. EOC | Orange Co. EOC | Bergen Co. EOC | EOF |
| 2nd Notification Sequence<br>Shelter: Remaining<br>Evacuate: 1, 2, 3, 4, 7, 8, 16, 18, 26, 29, 38, 39 | | 1211 | - | - | 1211 | 1211 | 1211 | 1211 | - | 1223 |
| 2nd Siren Activation | | 1223 | - | - | 1223 | 1223 | 1223 | 1223 | - | - |
| 2nd EAS or EBS Message | | 1226 | 1226 | - | 1226 | 1226 | 1226 | 1226 | | |
| 3rd Notification Sequence<br>Shelter: Remaining<br>Evacuate: 1, 2, 3, 4, 7, 8, 9, 16, 18, 26, 29, 38, 39 | | 1437 | | | 1303 | 1303 | 1303 | 1303 | - | 1315 |
| 3rd Siren Activation | | 1449 | - | - | 1315 | 1315 | 1315 | 1315 | - | - |
| 3rd EAS or EBS Message | | 1452 | 1318 | - | 1318 | 1318 | 1318 | 1318 | - | - |
| 4th Notification Sequence<br>Decision to Expand PAR<br>Shelter: Remaining<br>Evacuate: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 16, 17, 18, 19, 20, 23, 24, 25, 26, 29, 30, 38, 39, 40 | | 1437 | - | - | 1437 | 1437 | 1437 | 1437 | - | 1449 |
| 4th Siren Activation | | - | - | - | 1449 | 1449 | 1449 | 1449 | - | - |
| 4th EAS or EBS Message | | - | 1452 | - | 1452 | 1452 | - | 1452 | - | - |
| KI Decision | | - | - | - | 1530 | 1517 | - | 1518 | - | N/A |

## Table 1. Exercise Timeline
### INDIAN POINT 2 – September 24, 2002

* facility
** arrival of last EOC staff member

| | |
|---|---|
| **PAD for 2nd ANS –** | Evacuate ERPA's: Westchester, Putnam<br>Shelter ERPA's: Westchester, Rockland, Putnam, Orange |
| **PAD for 3rd ANS –** | Evacuate ERPA's: Westchester, Putnam<br>Shelter ERPA's: Westchester, Rockland, Putnam, Orange |
| **PAD for 4th ANS –** | Evacuate ERPA's: Westchester, Putnam, Orange, Rockland<br>Shelter ERPA's: Westchester, Rockland, Orange |

## IV. EXERCISE EVALUATION AND RESULTS

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the September 24, 2002, exercise to test the offsite emergency response capabilities of State and local governments in the 10-mile EPZ surrounding the Indian Point 2 Nuclear Power Station.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of criteria contained in the September 12, 2001, *Federal Register* Notice (revised April 25, 2002). Detailed information on the exercise criteria and the extent-of-play agreement used in this exercise are found in Appendix 3 of this report.

### A. Summary Results of Exercise Evaluation – Table 2

The matrix presented in Table 2, on the following page(s), presents the status of all exercise criteria which were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status of those criteria is indicated by the use of the following letters:

| | | |
|---|---|---|
| M | - | Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior exercises) |
| D | - | Deficiency assessed |
| A | - | ARCA(s) assessed |
| N | - | Not Demonstrated (Reason explained in Subsection B) |
| U | - | Unresolved ARCA(s) from prior exercises |

(See attached file IP2 SERF TABLE 2 final)

(See attached file IP2 SERF TABLE 2 final)

(See attached file IP2 SERF TABLE 2 final)

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(See attached file IP2 SERF TABLE 2 final)

## A. Summary Results of Exercise Evaluation

This subsection provides information on the evaluation of each participating jurisdiction and functional entity, in a jurisdiction-based, issues-only format. Presented below is a definition of the terms used in this subsection relative to objective demonstration status.

- **Met** - Listing of the demonstrated exercise objectives under which no Deficiencies or ARCAs were assessed during this exercise and under which no ARCAs assessed during prior exercises remain unresolved.

- **Deficiency** - Listing of the demonstrated exercise objectives under which one or more Deficiencies were assessed during this exercise. Included is a description of each Deficiency and recommended corrective actions.

- **Area Requiring Corrective Actions** - Listing of the demonstrated exercise objectives under which one or more ARCAs were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of the ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.

- **Not Demonstrated** - Listing of the exercise objectives which were not demonstrated as scheduled during this exercise and the reason they were not demonstrated.

- **Prior ARCAs - Resolved** - Description of ARCAs assessed during previous exercises which were resolved in this exercise and the corrective actions demonstrated.

- **Prior ARCAs - Unresolved** - Description of ARCAs assessed during prior exercises which 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 biennial exercise.

The following are definitions of the two types of exercise issues which are discussed in this report.

- A **Deficiency** is defined in FEMA-REP-14 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."

- An **ARCA** is defined in FEMA-REP-14 as "...an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety."

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

The identifying number for Deficiencies and ARCAs 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 Codes.

- **Exercise Year** - The last two digits of the year the exercise was conducted.

- **Evaluation Area Criterion** - A letter and number corresponding to the criteria in the FEMA REP Exercise Evaluation Methodology.

- **Issue Classification Identifier** - (D = Deficiency, A = ARCA). Only Deficiencies and ARCAs are included in exercise reports.

- **Exercise Issue Identification Number** - A separate two (or three) digit indexing number assigned to each issue identified in the exercise.

## B. Status of Jurisdictions Evaluated

## 1. NEW YORK STATE

### 1.1 Emergency Operations Center

a. **MET:** Evaluation Area Criteria 1.a.1, 1.b.1, 1.d.1, 1.e.1
2.a.1, 2.b.1, 2.b.2, 2.c.1
3.a.1, 3.c.1
5.a.1, 5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** ONE

**Issue No.:** 32-02-1.c.1-A-01

**Criterion:** 1.c.1

**Condition:** At 1112 hours, it was announced in the State Command Center, that the Governor had declared a State of Disaster Emergency for the counties of Orange, Putnam, Rockland, and Westchester and contiguous areas. The State Plan indicates that, once the State of Disaster Emergency has been declared, the State assumes the lead in decision-making and a State Coordinating Officer will be designated; however, this was not done. There was no announcement or mention to the counties that a change in the decision making process had occurred; decisions still occurred within the counties in coordination with the State Command Center even though the State EOC issued a news release (News Release No. 4, at 1:09 PM) indicating response actions were being coordinated by the Disaster Preparedness Commission.

**Possible Cause:** This particular process in the State Plan has not been practiced in recent drills or exercises. Specific players may not have been aware that the decision-making authority changes after a declaration of emergency has been made by the Governor for a nuclear power plant emergency.

**Reference:** State Plan, Section III, paragraph 2.8

**Effect:** Risk counties were not informed that the State was now the lead decision-maker for protective actions during the emergency response and may have been unaware that additional resources may have been available for the response.

**Recommendation:** When a decision is made by the Governor to declare a State

of Disaster Emergency, an announcement should be made over the Radiological Emergency Communication System (RECS line) indicating that the State is assuming overall command of response operations and is making available additional State resources. In addition, the State Plan should be reviewed to determine if this provision agrees with State law and the county plans. Annual training is required to ensure that all response personnel are aware of this procedure.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 1.2 Emergency Operations Facility

a. **MET:** Evaluation Area Criteria 1.b.1, 1.c.1, 1.d.1, 1.e.1
3.b.1
4.a.2

b.**DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** ONE

**Issue No.:** 32-02-3.a.1-A-02

**Criterion:** 3.a.1

**Condition:** The Westchester County, Rockland County, Orange County, and State Department of Health (DOH) personnel assigned to the EOF traveled through the Emergency Planning Zone, enroute to the EOF, without personnel monitoring dosimetry or potassium iodide (KI). They also were not aware of dose limits or administrative and decontamination reporting requirements.

**Possible Cause:** These individuals were not issued dosimetry or KI, as is required for all emergency workers.

**Reference:** NUREG-0654, Criteria K.3.a and J.10.e

**Effect:** The exposures received by these emergency workers coming to or leaving the facility would not be recorded. In addition, the EOF is not a shielded facility and these emergency workers could receive additional exposure while inside the EOF.

**Recommendation:** Provide all personnel assigned to the EOF a dosimetry/KI kit and training in the dose limits and reporting requirements.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. NOT DEMONSTRATED: NONE

e. **PRIOR ARCAs - RESOLVED:** ONE

**Issue No.:** 75-00-04-A-02 (1.d.1)

**Description:** Inoperable Utility supplied data system in Rockland, Westchester, and Orange Counties. The Utility-supplied Meteorological Information and Dose Assessment System (MIDAS) terminal and printer were inoperative in the County Emergency Operations Centers (EOCs) for much of the exercise. Problems were encountered when attempting to print the projections and plant status information that were updated every 15 minutes automatically. In addition to the printer problems, the data displayed were not always consistent with the plant status data that were being transmitted by fax from the EOF. This is a recurring problem. The Utility liaisons reported that there were problems. Considering the terrain and the potential for wind shifts, the hour-by-hour forecast information is an important tool for an effective response. (NUREG-0654, I.10; *New York State REPP*, Procedure H, *Assessment/Evaluation*.)

**Corrective Action Demonstrated:** The MIDAS system has been replaced by the Meteorological Radiological Plant Data System (MRP-DAS. The MRP-DAS provides technical data (containment temperature, containment pressure, containment radiation levels, stack vent release rates, and meteorological parameters) from the EOF to the State and County EOCs on a continuous basis. This system functioned properly throughout the exercise. This ARCA is resolved.

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 1.3 Joint News Center

a. **MET:** Evaluation Area Criteria 1.a.1, 1.b.1, 1.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** SEVEN

**Issue No.:** 32-02-1.d.1-A-03

**Criterion:** 1.d.1

**Condition:** The videoconference link in the Media Briefing room, (both audio and visual), between Orange County and the Joint News Center (JNC) was non-operational through the first three briefings.

**Possible Cause:** According to State personnel working on the failed link, "it is an AT&T problem, not ours."

**Reference:** NUREG-0654

**Effect:** As the videoconference equipment was located in the media briefing room in lieu of a Public Information Officer (PIO) from Orange County, the ability of the County and the media to discuss and disseminate accurate information was adversely affected. The media would have had to contact the Orange County Emergency Operations Center (EOC) directly for information, and would have received information that had not been coordinated through the JNC.

**Recommendation:** The videoconference equipment requires two dedicated telephone lines to allow two-way data flow for a video connection. This equipment should have been tested and the link established early for the exercise. When the link does fail to operate, a representative PIO from Orange County should be repositioned to the JNC, or a telephone conference line should be added to the media briefing room.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-1.e.1-A-04

**Criterion:** 1.e.1

**Condition:** The Main Briefing room audio multi-box was non-functional throughout the exercise.

**Possible Cause:** The audio multi-box in the main briefing room had a problem somewhere in the wiring.

**Reference:** NUREG-0654, E.5, E.7

**Effect:** The media was unable to gather and transmit good quality audio coming from the microphone located at the front podium. Media personnel were forced to place microphones against speakers for sound. Eventually, additional microphones were added to the podium.

**Recommendation:** The multi-box should be tested, repaired, or replaced. A back-up wire from the podium to the rear platform could also be installed, or provide one long enough to run the length of the room, to the rear platform.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-5.a.1-A-05

**Criterion:** 5.a.1 – Activation of the Prompt Alert and Notification System

**Condition:** The EAS messages and the Follow-On-News Bulletins did not provide timely, accurate information to the public. For example, the initial EAS message concluded with the phrase "Stay tuned to this Emergency Alert System station for further information and instructions." Since there was no Follow-On-News Bulletin for airing on the EAS station, and the EAS message did not contain a public inquiry number, the public would have had to wait two hours and 12 minutes until the second EAS airing at 1226 to receive the public inquiry number and further information and instructions.

**Possible Cause:** The staff developing the EAS messages and Follow-On-News Bulletins most likely did not develop a Follow-On-News Bulletin for the first EAS message since there were no detailed emergency instructions or protective action recommendations in the EAS message, and they did not realize that the EAS message did not include the public inquiry number.

**Reference:** NUREG-0654, E.5, 7

**Effect:** The public would have had to wait over two hours before hearing the public inquiry number. This is too long; many members of the public would have had important questions to ask of public safety officials.

**Recommendation:** Revise the EAS messages to include the public inquiry telephone number. Provide a Follow-On-News Bulletin for every EAS message. Provide additional training to the personnel who will compose the public information messages so that they will check to make sure that the public inquiry telephone number is broadcast in a timely fashion.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-5.b.1-A-06

**Criterion:** 5.b.1 – Emergency Information and Instructions for the Public and the Media

**Condition:** There were major delays between the actual times events occurred and the times that information was given to members of the media during briefings at the Joint News Center. Specific instances are documented in press briefings # 3, 4 & 5.

- The utility spokesperson, who introduced each press briefing, in press briefing # 3 announced at 1256 that a General Emergency (GE) had been declared, but failed to explain the significance of the event. He was followed by the Westchester County spokesperson who began reading EAS message #2 at 1257, describing a Site Area Emergency at the plant. Upon completion, the Westchester County spokesperson did refer to the previously announced GE condition at the plant, but also did not offer an explanation or additional information. Near the conclusion of this briefing, the State of New York spokesperson finally expressed grave concern about the GE, but offered no guidance.

- Press briefing # 4 began at 1356 and continued until 1423. At 1358, the Westchester County spokesperson read EAS message # 3 that had aired at 1318 hours. The message stated that there was no radiation release at the plant. Actually, a radiation release had been detected at the plant at 1354.

- Press briefing # 5 began at 1456 hours. The Westchester County spokesperson announced that EAS Follow-On-News Bulletin # 3, distributed at 1338 hours – an hour and 18 minutes earlier – had inadvertently stated that there had been a radiation release at the plant. The spokesperson asked that persons holding copies of Follow-On-News Bulletin # 3 destroy them, replacing them with "revised" Follow-On-News Bulletin #3. It was later learned that the JNC personnel had been aware of the incorrect bulletin by about 1353, several minutes before press briefing #4 began. However, a decision was made to hold on to the corrected announcement for more than an hour.

**Possible Cause:** There were instances during the exercise when press briefings were scheduled in order to deliver specific information, but even before the information was delivered to the media, it was being superseded by new and more serious information. Decisions were made to withhold the new information until a later press briefing instead of delaying or interrupting a press briefing in order to disseminate the most current information about conditions and protective actions to the media, and, therefore, the public.

**Reference:** NUREG-0654; E.5, 7.

**Effect:** The delays between the actual times that events occurred and the times that information was given to members of the media during briefings at the Joint News Center resulted in the most urgent and needed information being delayed for up to ninety minutes until the next scheduled press briefing.

**Recommendation:** The plan and procedures for conduct of press briefings must be revised to permit the introduction of new information and late-breaking news if it arises shortly before or during briefings. Press briefings should be delayed or interrupted in order to disseminate the most current information and protective actions. In addition, all public information staff, particularly those who would report to the JNC, should be trained on how to manage the situation when there is new information arriving just before or during a press briefing.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-5.b.1-A-07

**Criterion:** 5.b.1 - Emergency Information and Instructions for the Public and the Media

**Condition:** The Joint News Center personnel used emergency response protective area (ERPA) numbers only in announcing protective action decisions, rather than explaining the ERPAs by geographic descriptions as well.

**Possible Cause:** Since emergency response protective area zone numbers are published and made available to residents living within close proximity to the Indian Point Energy Center, it is assumed that all residents know "their" ERPA number, evacuation route and designated reception center. This is an unrealistic expectation. It also does not take into account how transients are given geographic information.

**Reference:** NUREG-0654; E.5, 7

**Effect:** Using ERPA zone numbers in public information, without giving the appropriate geographical information, could result in confusion on the part of residents and transients and cause them to respond incorrectly to emergency information and emergency instructions.

**Recommendation:** Review and revise the plan and procedures for providing protective action decision information to the public in order to clearly identify for residents and transients the area in which they are at the time of the announcement, and the correct protective actions to take at that time from that location. Provide additional training to all public information staff on the revised plan and procedures.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-5.b.1-A-08

**Criterion:** 5.b.1 - Emergency Information and Instructions for the Public and the Media

**Condition:** There were discrepancies between information in the EAS messages and the Follow-On-News Bulletins as well as missing or incorrect information in the Follow-On-News Bulletins. Specifically:

- EAS message #2 did not list ERPA 9 as evacuating, yet the Follow-On-News Bulletin references the evacuation route for ERPA 9 on page 2.
- EAS message #3 stated that there had not been a release of radioactive materials, while the first issuance of Follow-On-News Bulletin #3 stated that there was a release (see below).
- Follow-On-News Bulletins #'s 3 & 4 did not contain evacuation route instructions for previously evacuated ERPAs that were still under an evacuation

directive.

- Follow-On-News Bulletin # 5 stated that all ERPAs in Putnam County were sheltered when all ERPAs in Putnam County were evacuated.

- There was no explanation in any of the Follow-On-News Bulletins that the numbers preceding each paragraph are referring to the ERPA numbers.

The Follow-On-News Bulletin for EAS message # 3 had to be retracted and revised because the Bulletin stated that there *had* been a radioactive release when there *had not been a release*. EAS message # 3 was aired (simulated) at 1318; the original Bulletin was faxed (simulated) to the EAS station at 1336. At 1428, the State Public Information Officer (PIO) informed the County PIOs that the first version of the Bulletin contained erroneous information and had been retracted and replaced by a revised Bulletin. At 1501, during briefing # 5, the Westchester County PIO told the media representatives that they were to destroy the originals of the Bulletin and pick up the revised Bulletin. This was too late to prevent confusion on the matter.

**Possible Cause:** The pre-scripted EAS messages do not include the public inquiry telephone number. Also, the persons composing and approving the EAS messages and Follow-On-News Bulletins did not catch the errors and discrepancies noted above.

**Reference:** NUREG-0654; E.5, 7

**Effect:** Potential confusion on the part of the media and the public on (1) what the status of the emergency situation was, (2) how to get additional information via a public inquiry number, and (3) what to do in response to the emergency situation.

**Recommendation:** Review and revise the Joint News Center plan and procedures to include revised pre-scripted EAS messages and Follow-On-News Bulletins. The revisions should include necessary information (such as the public inquiry number) and a method to reduce the possibility of discrepancies between the EAS messages and the Follow-On-News Bulletins. One way to do this is to provide a *series* of pre-scripted EAS messages and Follow-On-News Bulletins that are consistent with each other that would cover a variety of emergency situations and protective responses, as is found in many other radiological plans and procedures for other sites in the country. The current "One Size Fits All" pre-scripted EAS message and Follow-On-News Bulletin included in the JNC plan and procedures is not sufficient. Also, provide additional training to the personnel who will compose and approve the EAS messages and Follow-On-News Bulletins during an exercise or incident.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 32-02-5.b.1-A-09

**Criterion:** 5.b.1 - Emergency Information and Instructions for the Public and the Media

**Condition:** Personnel at the Joint News Center did not explain the protective action decisions that had been made for residents and transients under the various emergency classification levels (ECLs) that were included in the EAS messages and Follow-On-News Bulletins.

**Possible Cause:** There may be a misconception among emergency management officials that residents understand emergency classification levels and know exactly what to do when given instructions in an EAS message and/or a Follow-On-News Bulletin, without further explanation provided at the press briefings.

**Reference:** NUREG-0654; E.5, E.7

**Effect:** A failure to completely inform residents and transients of what the emergency classification levels (ECLs) mean, and what protective action decisions are based on the ECLs, could result in the public not following appropriate and timely emergency instructions.

**Recommendation:** Review and revise the plan and procedures, and the text of the pre-scripted EAS messages and Follow-On-News Bulletins, to include explanations of the emergency classification levels and what they mean to the public. Provide all public information staff with additional training on the revised plan and procedures.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** THREE

**Issue No.:** 75-00-11-A-03 (5.b.1)

**Description:** The rumor control telephone number was not included in any printed information such as Special News Broadcasts, public information brochures or news releases. (NUREG-0654, G.2.c.; *2000 Joint News Center Procedures and Public Education Workplan; Planning For Emergencies*, pg.5, *Rumor Control.*)

**Reason ARCA Unresolved:** Although the number was announced at the media briefings, the rumor control telephone number is not printed in the Westchester, Rockland, Orange or the Putnam Counties' *Important Information on Indian Point and Planning for Emergencies* Brochure. Orange County did not publicize the public inquiry telephone number in its press releases at the Alert, SAE or the GE classification levels.

**Recommendation:** A listing in the public information brochure of a toll-free (800) emergency telephone number for public inquiries is necessary. It is confusing and misleading to print a toll-free (800) number for non-emergency questions and general information when it does not provide the public an immediate service during emergency situations. The plan and public information brochure should be revised to specify the dedicated public inquiry number that will be operational during an emergency. Once the predominant and significant rumors are identified, government officials must address them with the public through press releases and media briefings.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 75-00-11-A-04 (5.a.1)

**Description:** Per joint news center procedures, "if the EAS [Emergency Alert System] message contains a PAR [Protective Action Recommendation] for evacuation or sheltering, EAS personnel from counties and state will assist in preparing a special news bulletin which expands the information contained in the EAS broadcast message. Immediately after sign-off, the Special News Bulletin is faxed to the EAS station. The EAS coordinator confirms receipt of faxed bulletin with the station." This did not occur during the exercise. There was no follow-up message or bulletin sent to the EAS station. (NUREG-0654, E.5; *2000 Joint News Center Procedures and Public Education Workplan*, pg. 4, *EAS Message Preparation Procedures.*)

**Reason ARCA Unresolved:** The initial EAS message did not include a Follow-

On-News Bulletin, and so none was faxed to the EAS station. Subsequent EAS messages did have Follow-On-News Bulletins, but these, in accordance with the Extent-of-Play, were also not faxed to the EAS station. Therefore, the ARCA has not been resolved.

**Recommendation:** Demonstrate that Follow-On-News Bulletins will be faxed to the EAS station in the event of an emergency.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No.:** 75-00-12-A-05 (5.a.1)

**Description:** At the Joint News Center (JNC) media briefing, conducted at 1035 hours, the Westchester County Public Information Officer (PIO) announced that at 1039 hours sirens had been sounded at 1041 hours and an EAS message had been broadcast at 1044 hours. This was prior to these events. At the next media briefing at 1145 hours, the briefing was conducted during the time the second alert and notification sequence was occurring (with sirens sounded at 1150 hours and the EAS being broadcast at 1153 hours). Both of these media briefings should have been delayed until after the alert and notification activity had concluded. If these briefings had been broadcast live they could have created a great deal of confusion. (NUREG-0654, E.7; *2000 Joint News Center Procedures and Public Education Workplan*, pg. 2, *Media Briefings.*)

**Reason ARCA Unresolved:** As noted in the new issue #32-02-5.b.1-A-06 described above, there were, again, significant disconnects between the time that events occurred and the times that information was given to members of the media during briefings at the Joint News Center.

**Recommendation:** The plan and procedures for conduct of press briefings must be revised to permit the introduction of new information and late-breaking news, if it arises shortly before or during briefings. Press briefings should be delayed or interrupted in order to disseminate the most current information and protective actions. Additionally, when an alert and notification sequence is scheduled, the media briefings should be delayed until after the EAS broadcast. In addition, all public information staff, particularly those who would report to the JNC, should be trained on how to manage the situation when there is new information arriving just before or during a press briefing.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

## 1.4 Emergency Alert System - Station WABC

a. **MET:** Evaluation Area Criteria 5.a.1, 5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 2. RISK JURISDICTIONS

### 2.1 ORANGE COUNTY

#### 2.1.1 Orange County - Emergency Operations Center

a. **MET:** Evaluation Area Criteria

1.a.1, 1.b.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
4.a.2
5.a.1, 5.a.3

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** ONE

**Issue No.:** 32-02-5.b.1-A-10

**Criterion:** 5.b.1

**Condition:** Orange County press releases did not provide telephone numbers for the Public Inquiry Line, JNC-Media Response Desk, and the Orange County PIO.

**Possible Cause:** The public information function at the county emergency operations center was disrupted by failure of the video conference link with the Joint News Center.

**Reference:** NUREG-0654, E.5, 7; G.3.a, G.4.c

**Effect:** The news media and general public did not have complete information on who to contact for information on actions in Orange County.

**Recommendation:** Provide all public information staff with additional training to ensure that they understand which emergency information numbers should be provided to the media and the public. Develop or revise Standard Operating Procedures for preparing news releases.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.1.2 Orange County - Field Monitoring Teams

a. **MET:** Evaluation Area Criteria 1.a.1, 1.d.1, 1.e.1
3 .a.1, 3.b.1
4.a.1, 4.a.2, 4.a.3

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.1.3 Orange County - Reception Center (Out-of-sequence at Heritage Middle School on August 1, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.1.4 Orange County - Congregate Care Center (Out-of-sequence at Twin Towers Middle School on August 20, 2002)**

a. **MET:** Evaluation Area Criteria 6.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.1.5 Orange County - Emergency Worker Personnel Monitoring Center (Out-of-sequence at BOCES on September 19, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1
6.a.1; 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.1.6 Orange County - Special Population Bus Company Interviews (Out-of-sequence with West Point Tours on August 15, 2002)

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1; 3.b.1; 3.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.1.7 Orange County - School Bus Company Interviews (Out-of-sequence with West Point Tours on August 15, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1; 3.b.1; 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.1.8 Orange County - School Interviews (Out-of-sequence at James O'Neill High School on September 23, 2002)

a. **MET:** Evaluation Area Criteria 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.1.9 Orange County - Medical Drill (Out-of-sequence at Cornwall Hospital on October 24, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.d.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.1.10 Orange County - Traffic Control Points

a. **MET:** Evaluation Area Criteria 3.a.1, 3.b.1, 3.d.1, 3.d.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 2.2 PUTNAM COUNTY

### 2.2.1 Putnam County - Emergency Operations Center

a. **MET:** Evaluation Area Criteria 1.b.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
4.a.2
5.a.1, 5.a.3, 5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** ONE

**Issue No.:** 32-02-1.a.1-A-11

**Criterion:** 1.a.1

**Condition:** The initial notification to several county emergency management leaders indicated that a Site Area Emergency (SAE) had been declared; however, this was not correct: at that time an Alert had been declared.

**Possible Cause:** The initial notification to these personnel came from the Warning Point (WP) located in the County Supervisor Dispatch Office. The information provided to them incorrectly called the situation an SAE. This is not consistent with the initial call from the plant's Emergency Operations Facility (EOF) over the Radiological Emergency Communications System line.

**Reference:** NUREG-0654; E.1, E.2

**Effect:** Emergency workers were given incorrect information and could have made inappropriate decisions.

**Recommendation:** County Dispatcher/Communications personnel should participate in additional training with emphasis on accuracy.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** ONE

**Issue No.:** 75-00-11-A-07 (5.a.1)

**Description:** Emergency Alert System (EAS) message Number Four discusses how traffic control has been established to restrict access to the portion of Putnam County located within 10 miles of the plant. However, during the exercise and through interview, County officials stated that access control had not been established around any of the sheltered areas. Only two Traffic Control Points (TCPs) had been identified through Controller inject. Access to Putnam County within the EPZ was not restricted. It is noted that draft EAS messages were sent to the EOC for review and approval. Information should be verified for all activities prior to release. It is also noted that a draft message did indicate a modification that was not done by the Joint News Center. (NUREG-0654, E.5; *Putnam RERP*, Section III, *Response*, e. *Public Information.*)

**Demonstrated Corrective Actions:** The capability to provide accurate emergency information and instructions, including any recommended protective actions to the public and the media in a timely manner, was adequately demonstrated. After the initial EAS message, Putnam County prepared 10 press releases and supplied information to the EAS Follow-on News Releases and for the Public Information Officer (PIO) at the JNC. The first press release informed the public that the County EOC had been activated and that staff was also at the Joint News Center. Other press releases discussed the evacuation and sheltering of Emergency Response Planning Areas (ERPAs) in Putnam County, the evacuation routes, location of relocation centers, the closing of senior nutrition sites, the movement of school children out of the EPZ, the shift change of the County Executive by the Deputy County Executive, and the monitoring of the County for possible contamination.

The media releases were prepared at the JNC and faxed to the County EOC where they were given to the Executive Team for review and approval. Each member of the team reviewed each message for consistency and accuracy. Edits were made and revisions were then prepared for final approval. The releases were not signed off on until the corrections had been verified. This ARCA was successfully addressed and is closed.

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.2.2 Putnam County - Field Monitoring Teams

a. **MET:** Evaluation Area Criteria 1.a.1, 1.d.1, 1.e.1
3.a.1, 3.b.1
4.a.1, 4.a.2, 4.a.3

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** THREE

**Issue No.:** 75-00-06-A-08 (4.a.1)

**Description:** Procedure 4, Attachment 4 of the *Putnam County Radiological Emergency Response Plan* calls for performing a source check on the RO-2A instrument using a cesium-137 check source, as indicated in Section 1.1.3 under *Radiation Survey Techniques* (p. D-21). Also, Procedure 4, Attachment 4, Section 2.3 under *Airborne Survey Techniques* (p. D-22) calls for doing a source check on the Eberline RM-14 meter using the cesium-137 check source. Neither of the prescribed source checks was performed by Field Monitoring Team A. (NUREG-0654, H.10; *Putnam County RERP*, Procedure 4, *Radiological Officer*, Attachment 4, *Field Monitoring*.)

**Demonstrated Corrective Actions:** Field Team A did a thorough check of both the RO-2A instrument and the Eberline RM-14 meter and their back-ups using a cesium-137 check source.

The Putnam County Radiological Monitoring Team B performed source checks on their instruments to ensure correct instrument response. On both the RO-2A and RM-14 instruments, a cesium-137 source (5 uCi-1998) was used and both instruments operated correctly.

**Issue No.:** 75-00-08-A-09 (4.a.1)

**Description:** Putnam County Field Team B's RM-14 instrument alarm and flashing light could not be turned off during check out, however, the team continued to use the instrument in the field. Under these conditions, accuracy of results and operability of the instrument would be questionable. (NUREG-0654, H.10; *Putnam County RERP*, Procedure 4, *Radiological Officer*, Attachment 4, *Field Monitoring*, p. D-23.)

**Demonstrated Corrective Actions:** Field Team A did a thorough check of both the RO-2A instrument and the Eberline RM-14 meter and their back-ups using a cesium-137 check source. All four instruments were in proper working order. The back-up detectors were taken to the field in case of malfunction.

The Putnam County Radiological Monitoring Field Team B employed an RM-14 instrument that was correct in its response and functioned properly with its audio and visual alarms.

**Issue No.:** 75-00-08-A-10 (4.a.1)

**Description:** Field Team B did not protect the detector from contamination during particulate air monitoring. It is standard practice for a field monitoring team to cover a detector with thin, transparent plastic during particulate filter measurements in order to protect the instrument from contamination and to avoid erroneous readings. (NUREG-0654, I.9; *Putnam County RERP*, Procedure 4, *Radiological Officer*, Attachment 4, *Field Monitoring*, pp. D-19 and D-23.)

**Demonstrated Corrective Actions:** Field Team A covered the probes for the two RO-2A radiation detectors with a thin layer of plastic to protect the instruments from contamination causing erroneous readings.

The Putnam County Radiological Monitoring Field Team B, in its three air sample collections and subsequent measurements, always employed a thin plastic probe cover during particulate filter measurements.

**f. PRIOR ARCAs - UNRESOLVED:** NONE

### 2.2.3 Putnam County - Reception Center (Out-of-sequence at Carmel High School on July 30, 2002)

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.2.4 Putnam County - Congregate Care Center (Out-of-sequence at George Fischer Middle School on July 30, 2002)**

a. **MET:** Evaluation Area Criteria 6.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.2.5 Putnam County - Emergency Worker Personnel Monitoring Center (Out-of-sequence at the Carmel Fire Department on April 30, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1, 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.2.6 Putnam County - Special Population Bus Company Interviews (Out-of-sequence at the Haldane School District, the Mahopac School District, and the Garrison District on April 18 and June 19, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1, 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.2.7 Putnam County - School Bus Company Interviews (Out-of-sequence at the Putnam Valley School District and the Hudson Valley buses on May 2 and June 12, 2002)

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1; 3.b.1; 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.2.8 Putnam County - School Interviews (Out-of-sequence at Garrison U.F.E.S., Putnam Valley Middle School/High School, and Bonous Montessori on May 2, May 23 and June 12, 2002)**

a. **MET:** Evaluation Area Criteria 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.2.9 Putnam County - Medical MS-1 Drill (Out-of-sequence at Putnam Hospital on May 15, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.d.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.2.10 Putnam County – Traffic Control Points

a. **MET:** Evaluation Area Criteria 3.a.1, 3.b.1, 3.d.1, 3.d.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 2.3 ROCKLAND COUNTY

### 2.3.1 Rockland County - Emergency Operations Center

a. **MET:** Evaluation Area Criteria 1.a.1, 1.b.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
4.a.2
5.a.1, 5.a.3, 5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** ONE

**Issue No.:** 75-00-03-A-11 (1.c.1)

**Description:** Rockland County did not keep Bergen County abreast of important information and developments. For example, Rockland County did not notify Bergen County that an SAE had been declared until after notifying Bergen that a GE had been declared. Bergen County learned of the SAE only after calling back to Rockland to confirm the GE. In addition, Bergen County was only notified of the first siren activation and EAS message. No notice was given of the final three activations and messages, nor was Bergen County notified of the termination of the radioactive release. (NUREG-0654, A.1.d., 2.a.,b.; *Rockland County REPP*, Procedure RC/BC-1, *Rockland County/Bergen County Liaisons*, Section 5.3.1, *EOC Operations*.)

**Reason ARCA Unresolved:** Rockland County did not provide information to Bergen County in a timely manner. Information to Bergen County from Rockland County was obtained only in response to direct requests to Rockland County from the Bergen County EOC. The Liaison from the Rockland County Sheriff's Office arrived and immediately stated that he had only been directed to perform this duty 48 hours previously. He further stated that he had received no training for the task he was about to undertake and that he had been told to report to the Bergen County EOC Director who would tell him what to do. Ultimately, the Bergen County EOC Director asked the Rockland County Liaison to call the Rockland County EOC for updates every 15 minutes.

In addition, the Bergen County liaisons within the Rockland County EOC also indicated that they were new to this assignment and unfamiliar with their responsibilities and the plan. For example, the Rockland County Operations Chief had to speak directly to the liaison in Bergen County to pass information to Bergen County, because the liaisons within the Rockland EOC did not know what information to pass on: the decision to activate school reception centers, and congregate care centers (which are in Bergen County) was not communicated to Bergen County.

**Recommendation:** Review and revise the Rockland County Plan and Procedures for communication with Bergen County. Review and revise the plan and procedures for Bergen County. Train all personnel who will have duties providing communications between Rockland and Bergen Counties.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

### 2.3.2 Rockland County - Field Monitoring Teams

a. **MET:** Evaluation Area Criteria 1.a.1, 1.d.1, 1.e.1
3.a.1, 3.b.1
4.a.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** TWO

**Issue No:** 32-02-4.a.2-A-12

**Criterion:** 4.a.2

**Condition:** Field Monitoring Team #1 was not informed of key information in accordance with Radiological Emergency Response Agency Procedure, DOH-7, "Field Monitoring Team Coordinator," Section 5.4.9.

**Possible Cause:** Periodic contacts with Field Monitoring Team #1 did not request acknowledgement from the team that appropriate information designated in the procedure was received.

**Reference:** NUREG-0654, I.8., 11.

**Effect:** Information related to protective actions taken is essential for field teams supporting plume tracking, contamination control, and management of radiological exposures.

**Recommendation:** EOC staff involved in transmission of information to field teams should carefully follow the designated procedure and request acknowledgements from field teams that they are aware of prescribed information affecting field activities.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

**Issue No:** 32-02-4.a.3-A-13

**Criterion:** 4.a.3

**Condition:** After completing the air sample with the Air Sampler H-809C, a field team member placed the uncovered filter and cartridge on the radiator grill area

adjacent to the battery, causing cross contamination from the vehicle surface to the filter and cartridge.

Through interview, the team simulated moving to a low background area to survey the filter and cartridge. A team member placed the Ludlum 14C survey instrument (pancake probe) directly on the contaminated filter and cartridge while surveying the samples.

The Air Sampler H-809C and the Eberline RO-2A were placed in the same plastic bag as was used for personal protective clothing and equipment.

Though the filter and cartridge samples were properly bagged and labeled, they were placed in the field team kit without being monitored.

**Possible Cause:** The Rockland County Emergency Preparedness Radiological Response Plan and support procedures did not adequately address contamination control of samples during collection and transfer. The instrumentation operation procedures within the plan did not adequately detail contamination control procedures with regards to instrument usage and storage during field operations.

**Reference:** NUREG-0654, I.9

**Effect:** The lack of contamination control in the control and transfer of field samples could result in the Field Monitoring Team relaying incorrect exposure information to Dose Assessment at the EOC, thus altering the Rockland County Protective Action Decisions.

**Recommendation:** Additional training of the Field Monitoring Team and further clarification of the sampling and contamination reduction procedures should be considered. The Field Team Procedures and other portions of the field kit should not be placed on the ground or under the hood during sampling. To reduce general cross contamination during field operations, the team should place the air sampler and the Eberline RO-2A in separate individual plastic bags.

The Air Sampler H-809C, Ludlum 14C, and Eberline RO-2A survey techniques contained in the Rockland County Emergency Preparedness Radiological Response Plan Standard Operating Procedures (DOH 11, Attachment 4, pp. 11-13) should be updated to include detailed information on general field team and instrument specific cross-contamination techniques.

**Schedule of Corrective Actions:**

The State has not submitted a Schedule of Corrective Actions.

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.3.3 Rockland County - Reception Center (Out-of-sequence at Suffern High School on August 1, 2002)

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1, 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** ONE

**Issue No.:** 75-00-18-A-12 (6.2.1)

**Description:** There was only one female monitor for the female shower at the Tappan Zee Reception Center and two are required (per Rockland County Procedures and the Extent-of-Play Agreement). (NUREG-0654, J.10.h., 12; *Rockland County REPP*, Procedure DOH-2, *Personnel Monitoring Centers*, Section 5.1.1.)

**Recommendation:** Additional female monitors should be trained to assure staffing for the female decontamination area is sufficient.

**Demonstrated Corrective Action:** At the Reception Center demonstration at Suffern High School on August 19, 2002, there were two male and two female workers to provide decontamination to male and female individuals.

f. **PRIOR ARCAs - UNRESOLVED:** ONE

**Issue No.:** 75-00-18-A-13 (6.2.1)

**Description:** Holding areas in the cafeteria at the Tappan Zee Reception Center are not designated for evacuees awaiting transportation to shelters or private transportation. (NUREG-0654, J.12; *Rockland County REPP*, Procedure DSS-2, *Department of Social Services Emergency Response Actions*, Section 5.3.3.)

**Recommendation:** The diagram of the reception center should include designated areas for evacuees awaiting transportation to shelters or private transportation.

**Demonstrated Corrective Action:** FEMA has not yet received an updated diagram of the Tappan Zee Reception Center Reception Center.

**2.3.4 Rockland County - Congregate Care Center (Out-of-sequence at Bergen Community College, Fairleigh Dickinson University, and Ramapo College on September 4 and September 9, 2002)**

a. **MET:** Evaluation Area Criteria 6.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs – RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.3.5 Rockland County - Emergency Worker Personnel Monitoring Center (Out-of-sequence at the County Sewer District offices on June 25, 2002)

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1, 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.3.6 Rockland County - Special Population Bus Company Interviews (Out-of-sequence at Chestnut Ridge, Clarkstown Central School District, Haverstraw, and Peter Brega on June 11 – 14, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1, 3.b.1, 3.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.3.7 Rockland County - School Bus Company Interviews (Out-of-sequence at Chestnut Ridge, Clarkstown Central School District, Haverstraw, and Peter Brega on June 11 - 14, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1, 3.b.1, 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.3.8 Rockland County - School Interviews (Out-of-sequence at St Paul's School, Clarkstown Senior High School, James A. Farley Middle School, Lime Kiln Elementary School, and Robin Hill School on May 28, June 10, and September 18, 2002)**

a. **MET:** Evaluation Area Criteria 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.3.9 Rockland County - Medical Drill (Out-of-Sequence at Good Samaritan Hospital on May 4, 2001)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.d.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.3.10 Rockland County -Traffic Control Points

a. **MET:** Evaluation Area Criteria 3.a.1, 3.b.1, 3.d.1, 3.d.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## 2.4 WESTCHESTER COUNTY

### 2.4.1 Westchester County - Emergency Operations Center

a. **MET:** Evaluation Area Criteria 1.a.1, 1.b.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
4.a.2
5.a.1, 5.a.3, 5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.4.2 Westchester County - Field Monitoring Teams

a. **MET:** Evaluation Area Criteria 1.a.1, 1.d.1, 1.e.1
3.a.1, 3.b.1
4.a.1, 4.a.2, 4.a.3

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.4.3 Westchester County - Reception Center (Out-of-sequence at Westchester Community College on August 14, 2002)

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1, 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.4.4 Westchester County - Congregate Care Center (Out-of-sequence at Westchester Community College on August 14, 2002)**

a. **MET:** Evaluation Area Criteria 6.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.4.5 Westchester County -Emergency Worker Personnel Monitoring Center (Out-of-sequence at the Fire Training Center on July 19, 2002)**

a. **MET:** Evaluation Area Criteria 3.a.1; 6.a.1, 6.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.4.6 Westchester County - Special Population Bus Company Interviews (Out-of-sequence with Liberty Lines and Royal Coach on September 10, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1, 3.b.1, 3.c.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.4.7 Westchester County - School Bus Company Interviews (Out-of-sequence at the Hendrick Hudson School District, Liberty Lines, and the Lakeland Central School District on September 10, September 16, and September 19, 2002)**

a. **MET:** Evaluation Area Criteria 1.d.1; 3.a.1, 3.b.1, 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

**2.4.8 Westchester County - School Interviews (Out-of-sequence at Hillcrest Elementary School, Buchanan-Verplanck Elementary School, Pinesbridge School, Briarcliff High School, Croton-Harmon High School, Benjamin Franklin Elementary School, St. Ann's School, West Orchard Elementary School, and St. Patrick's School on June 10, June 12-14, and June 17, 2002)**

a. **MET:** Evaluation Area Criteria 3.c.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

### 2.4.9 Westchester County - Medical MS-1 Drill (Out-of-sequence at Westchester Medical Center on June 11, 2002)

a. **MET:** Evaluation Area Criteria 3.a.1; 6.d.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** ONE

**Issue No.:** 75-00-21-A-26 (6.d.1)

**Description:** The Medical team failed to isolate and control radioactive contamination within the treatment room. The patient was brought on an ambulance gurney into a Radiological Emergency Treatment Area (RETA) within the Westchester County Medical Center and immediately transferred onto a hospital treatment table. The initial radiological scanning of the patient was performed on this table, while the patient was still fully clothed, immediately after his vital signs had been checked and Demerol had been administered. This scanning revealed radiological contamination was present. The patient was undressed (his clothing was cut away) and rescanned. Radiological contamination was still present. The medical team spent approximately one hour attempting to determine the location and extent of radiological contamination, without success. At this point, the Drill Controller intervened in order to continue the drill and advised the Medical team that they had contaminated the treatment area by transferring the patient from the gurney without first undressing him. The Drill Controller also gave the Medical team some suggestions on how to properly scan the patient in order to determine the extent of contamination. (NUREG-0654, L.1; Rockland County REPP, p. III-38, Section 12, Hospitals and Medical Facilities, Procedure EMS-2, *Handling and Transport of Contaminated and/or Injured Individuals to Medical Facilities.*)

**Recommendation:** The Medical team at the Westchester County Medical Center should be given additional training in techniques to identify and control radioactive contamination.

**Demonstrated Corrective Actions:** The attending Physician and his medical team clearly and repeatedly demonstrated an awareness of the importance of contamination control. The radiological monitor closely checked for contamination on all surfaces, starting with the ambulance and continuing into the radiological treatment area within the hospital. The Physician repeatedly asked to have his

hands scanned for contamination and frequently changed his gloves and, as necessary, his gown. Procedures and checklists for treatment and contamination control were prominently posted within the radiological treatment area. The Physician and the medical support team repeatedly referred to these displays and highlighted (marked) completed steps. The patient was successfully transferred from the ambulance gurney to a treatment table without any cross contamination.

**f. PRIOR ARCAs - UNRESOLVED:** NONE

### 2.4.10 Westchester County - Traffic Control Points

a. **MET: Evaluation Area Criteria** 3.a.1, 3.b.1, 3.d.1, 3.d.2

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs – RESOLVED:** NONE

f. **PRIOR ARCAs – UNRESOLVED:** NONE

**2.4.11 Westchester County – Equipment Inventory (Out-of-sequence at the County Fire Training Center, Westchester Community College, and the County Health Department on July 19, 2002, August 14, 2002, and September 24, 2002)**

a. **MET:** Evaluation Area Criteria 1.e.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs – RESOLVED:** NONE

f. **PRIOR ARCAs – UNRESOLVED:** NONE

## 3. SUPPORT COUNTY

### 3.1 Bergen County - Emergency Operations Center

a. **MET:** Evaluation Area Criteria 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1
3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2
5.b.1

b. **DEFICIENCY:** NONE

c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

d. **NOT DEMONSTRATED:** NONE

e. **PRIOR ARCAs - RESOLVED:** NONE

f. **PRIOR ARCAs - UNRESOLVED:** NONE

## APPENDIX 1

## ACRONYMS AND ABBREVIATIONS

The following is a list of the acronyms and abbreviations that were used in this report.

| | |
|---|---|
| ACP | Access Control Point |
| ANL | Argonne National Laboratory |
| ARC | American Red Cross |
| ARCA | Area Requiring Corrective Action |
| ARES | Amateur Radio Emergency Service |
| BCEOC | Bergen County Emergency Operations Center |
| BCFA | Bergen County Field Activities |
| BOCES | Board of Cooperative Educational Services |
| CFR | Code of Federal Regulations |
| CPM | Counts Per Minute |
| DOE | U.S. Department of Energy |
| DOH | Department of Health |
| DOT | U.S. Department of Transportation |
| EAL | Emergency Action Level |
| EAS | Emergency Alert System |
| ECL | Emergency Classification Level |
| EMS | Emergency Medical Service |
| EMO | Emergency Management Organization |
| EOC | Emergency Operations Center |
| EOF | Emergency Operations Facility |
| EPA | U.S. Environmental Protection Agency |
| EPZ | Emergency Planning Zone |
| ERF | Emergency Response Facility |
| ERPA | Emergency Response Planning Area |
| EV-2 | REP School Interview Questionnaire |
| EWPMC | Emergency Worker Personnel Monitoring Center |
| FAA | Federal Aviation Administration |
| FDA | U.S. Food and Drug Administration |
| FEMA | Federal Emergency Management Agency |

| | |
|---|---|
| GE | General Emergency |
| HELP | Helicopter Emergency Lift Program |
| ICF | ICF Consulting, Inc. |
| INEEL | Idaho National Environmental and Engineering Laboratory |
| IP2 | Indian Point 2 |
| IPNPS | Indian Point Nuclear Power Station |
| JNC | Joint News Center |
| KI | Potassium Iodide |
| MIDAS | Meteorology Information and Dose Assessment System |
| mR | MilliRoentgen |
| MRP-DAS | Meteorological Radiological Plant Data System |
| NOUE | Notification of Unusual Event |
| NRC | U.S. Nuclear Regulatory Commission |
| NUREG-0654 | 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* |
| NYS | New York State |
| NYSEMO | New York State Emergency Management Office |
| OCEOC | Orange County Emergency Operations Center |
| OCFA | Orange County Field Activities |
| ORO | Offsite Response Organization |
| PAR | Protective Action Recommendation |
| PCEOC | Putnam County Emergency Operations Center |
| PEARL | Putnam County Emergency Amateur Repeater League |
| PIO | Public Information Officer |
| PMC | Personnel Monitoring Center |
| PSC | New York State Public Service Commission |
| RAC | Regional Assistance Committee |
| RACES | Radio Amateur Civil Emergency Service |
| RCEOC | Rockland County Emergency Operations Center |
| RCFA | Rockland County Field Activities |
| REA | Radiological Emergency Treatment Area |
| RECS | Radiological Emergency Communications System |

| | |
|---|---|
| REP | Radiological Emergency Preparedness |
| REPP | Radiological Emergency Preparedness Plan |
| RERP | Radiological Emergency Response Plan |
| RETA | Radiological Emergency Treatment Area |
| SAE | Site Area Emergency |
| SEMO | State Emergency Management Office |
| SEOC | State Emergency Operations Center |
| TCP | Traffic Control Point |
| TDD | Telephone Device for the Deaf |
| TEDE | Total Effective Dose |
| TL | Team Leader |
| TLD | Thermoluminescent Dosimeter |
| USDA | U.S. Department of Agriculture |
| WCEOC | Westchester County Emergency Operations Center |
| WCFA | Westchester County Field Activities |

## APPENDIX 2

## EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel who evaluated the Indian Point 3 exercise on September 24, 2002. Evaluator Team Leaders are indicated by the letters "(TL)" after their names. The organization which each evaluator represents is indicated by the following abbreviations:

| | |
|---|---|
| DOT | - Department of Transportation |
| EPA | - Environmental Protection Agency |
| FEMA | - Federal Emergency Management Agency |
| ICF | - ICF Consulting |
| INEEL | - Idaho National Environmental and Engineering Laboratory |
| NRC | - Nuclear Regulatory Commission |
| USDA | - US Department of Agriculture |

| | NAME | ORGANIZATION |
|---|---|---|
| RAC Chairperson | R. Reynolds | FEMA |
| Project Officer | P. Malool | FEMA |

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| **NEW YORK STATE** | | |
| Emergency Operations Center (EOC) | R. Poole | FEMA (TL) |
| | L. Record | FEMA |
| | K. McCarroll | FEMA |
| | B. Edmonson | ICF |
| | N. Gaeta | ICF |
| Emergency Operations Facility (EOF) | R. Black | ICF |
| Joint News Center (JNC) | R. Echavarria | FEMA (TL) |
| | N. Goldstein | FEMA |
| | D. Jacks | FEMA |
| | P. Tenorio | FEMA |
| | P. Nied | ICF |
| EAS Station WABC | B. Vocke | ICF |

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| **RISK JURISDICTIONS** | | |
| **Orange County** | | |
| Orange County EOC | P. Malool | FEMA (TL) |
| | N. Tang | FEMA |
| | S. O'Neill | FEMA |
| | H. Berry | ICF |
| | A. Thompson | FEMA |
| Field Monitoring Team | T. Mignone | HHS |
| | Eric Simpson | EPA |
| Traffic Control Point | S. O'Neill | FEMA |
| **Putnam County** | | |
| Putnam County EOC | J. Young | FEMA (TL) |
| | N. Brignoni | FEMA |
| | M. Matia | FEMA |
| | Daryl Thome | ICF |
| Field Monitoring Team | S. Nelson | ICF |
| | J. Staroba | ICF |
| Traffic Control Point | M. Matia | FEMA |
| **Rockland County** | | |
| Rockland County EOC | K. Reed | FEMA (TL) |
| | A. Canida | FEMA |
| | R. Ohlsen | FEMA |
| | A. Davis | FEMA |
| | H. Harrison | ICF |
| Field Monitoring Team | C. Gordon | USNRC |
| | T. Brown | ICF |
| Traffic Control Point | A. Davis | FEMA |

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| **Westchester County** | | |
| Westchester County EOC | B. Hasemann | FEMA (TL) |
| | L. Visniesky | ICF |
| | D. Petta | USDOT |
| | K. Barrett | USDA |
| | J. Keller | ICF |
| Field Monitoring Team | J. Eng | EPA |
| | R. Bernacki | FDA |
| Traffic Control Points | L. Visniesky | ICF |
| **Bergen County** | | |
| Bergen County EOC | W. Dobinson | FEMA (TL) |
| Emergency Operations Center | J. Flynn | ICF |

**OUT-OF-SEQUENCE ACTIVITIES**

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| **Orange County** | | |
| Reception Center (August 1, 2002) | S. O'Neill | FEMA |
| Congregate Care Center (August 20, 2002) | P. Malool & | FEMA |
| | S. O'Neill | FEMA |
| Emergency Worker PMC (September 19, 2002) | S. O'Neill | FEMA |
| Special Pop. Bus Company Interviews (August 15, 2002) | S. O'Neill | FEMA |
| School Bus Company Interviews (August 15, 2002) | S. O'Neill | FEMA |

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| School Interview (September 23, 2002) | S. O'Neill | FEMA |
| Medical Drill (MS-1) (June 11, 2002) | B. Hasemann<br>P. Malool | FEMA<br>FEMA |
| **Putnam County** | | |
| Reception Center (July 30, 2002) | S. O'Neill<br>K. Reed | FEMA<br>FEMA |
| Congregate Care Center (July 30, 2002) | S. O'Neill | FEMA |
| Emergency Worker PMC (April 30, 2002) | Jaye Sutton | FEMA |
| Special Pop. Bus Company Interviews (April 18 and June 19, 2002) | Susan O'Neill<br>Jaye Sutton | FEMA<br>FEMA |
| School Bus Company Interviews (May 2 and June 12, 2002) | Jaye Sutton | FEMA |
| School Interviews (May 2, 23, and June 12, 2002) | Jaye Sutton | FEMA |
| Medical Drill (MS-1) (May 15, 2002) | Paul Malool<br>Kevin Reed<br>Jaye Sutton | FEMA<br>FEMA<br>FEMA |

| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| **Rockland County** | | |
| Reception Center (August 19, 2002) | R.Black | ICF |
| Congregate Care Centers (September 4 and 9, 2002) | R. Reynolds<br>P. Malool<br>K. Reed | FEMA<br>FEMA |

| | | |
|---|---|---|
| Emergency Worker PMC<br>(June 25, 200) | R. Black<br>K. Reed | ICF<br>FEMA |
| Special Pop. Bus Company Interviews<br>(June 11-14, 2002) | R. Black | ICF |
| School Bus Company Interviews<br>(June 11 – 14, 2002) | R. Black | ICF |
| School Interviews<br>(May 28, June 10,<br>and September 18, 2002) | K. Reed<br>P. Malool | FEMA<br>FEMA |
| Medical Drill (MS-1) | Paul Malool | FEMA |

**Westchester County**

| | | |
|---|---|---|
| Reception Center<br>(August 14, 2002) | B. Hasemann | FEMA |
| Congregate Care Center<br>(August 14, 2002) | B. Hasemann | FEMA |
| Emergency Worker PMC<br>(July 19, 2002) | B. Hasemann | FEMA |

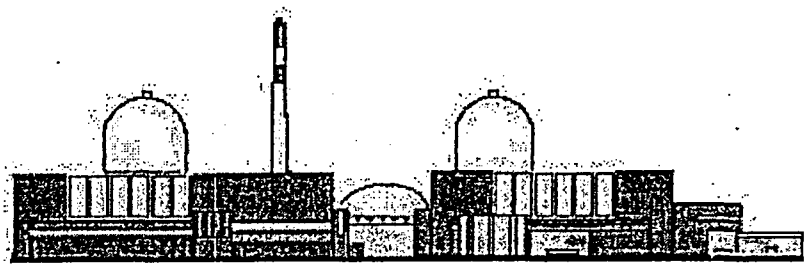
| EVALUATION SITE | EVALUATOR | ORGANIZATION |
|---|---|---|
| Special Pop. Bus Company Interviews<br>(September 10, 2002) | B. Hasemann | FEMA |
| School Bus Company Interviews<br>(September 10, 16, and 19, 2002) | B. Hasemann | FEMA |
| School Interviews<br>(June 10, 12, 13, 14, and 17, 2002) | B. Hasemann | FEMA |
| Medical Drill (MS-1)<br>(June 11, 2002) | B. Hasemann<br>P. Malool | FEMA<br>FEMA |

# APPENDIX 3

## EXERCISE OBJECTIVES AND EXTENT-OF-PLAY AGREEMENT

## INDIAN POINT 2
## NUCLEAR POWER STATION

**SEPTEMBER 24, 2002**



# FINAL

## OFFSITE EXTENT-OF-PLAY

## FOR THE

## SEPTEMBER 24, 2002

## INDIAN POINT 2 FULL-PARTICIPATION

## EXERCISE

## EXTENT-OF-PLAY GROUND RULES

- **REAL LIFE EMERGENCIES TAKE PRIORITY OVER EXERCISE PLAY.**

- The Scenario Development Team will develop the free play messages. The State Controller will inject the message to the County Emergency Management Director or his designee for action.

- Free play messages for Public Inquiry at the Joint News Center (JNC) will be developed by the Scenario Development Team. Rumor control messages will be injected at the JNC by a control cell.

- The State Controller will inject radiological data for any radiological field activities (Field Teams, Emergency Worker Personnel Monitoring Centers, Reception Centers).

- According to REP Program Strategic Review Initiative 1.5, "During tabletop exercises, drills and other demonstrations conducted out-of-sequence from an integrated exercise, if FEMA and the offsite response organizations (ORO) agree, the FEMA Evaluator may have the participants re-demonstrate an activity that is determined to be not satisfactorily demonstrated. Immediate correction of issues in an integrated exercise is authorized only if it would not be disruptive and interrupt the flow of the exercise and affect other Evaluation Areas." This initiative is <u>not</u> applicable to Emergency Operations Center/Joint News Center/Emergency Operations Facility demonstrations during the September 24, 2002 exercise.

## EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

### Sub-element 1.a – Mobilization

***Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654, A.4; D.3, 4; E.1, 2; H.4)***

**WARNING POINTS**

**Extent-of-Play Agreement:**

- The latest quarterly revised call lists will be provided at the Federal/State evaluators briefing session the day before the exercise, if requested by FEMA. The lists will contain the business telephone numbers only.

- There will be no free play messages introduced at the Warning Points.

**EOCs**

**Extent-of-Play Agreement:**

- State liaisons will be pre-positioned in the area and will arrive at County Emergency Operations Centers (EOCs) 30 minutes after the ALERT or greater Emergency Classification Level (ECL) notification is received by the State. Utility Technical Liaisons assigned to the State EOC will be pre-positioned and arrive at the State EOC 30 minutes after the ALERT or greater ECL notification.

**EOF**

**Extent-of-Play Agreement:**

- State liaisons will be pre-positioned in the area and will arrive at the EOF 30 minutes after the ALERT or greater ECL notification is received by the State.

**JNC**

**Extent-of-Play Agreement:**

- State Joint News Center (JNC) Staff will be pre-positioned and arrive at the JNC 30 minutes after the ALERT or greater ECL notification is received by the State.

- Orange County will utilize a videoconferencing link from the County EOC to the JNC. The

Orange County Public Information Officer (PIO) will be present at the County EOC.

## EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

### Sub-element 1.b – Facilities

*Criterion 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654, H.3)*

**Extent-of-Play Agreement:**

- Back-up power is available, but will not be activated, for the State, four Risk County EOCs, and Bergen County. EOC.
- Maps and displays will vary with each facility and may include printouts and listings.
- Additional baseline facility evaluations, outside of those detailed in the Offsite Extent-of-Play Activities Schedule, will be conducted after the exercise as agreed to by FEMA, New York State Emergency Management Office (NYSEMO) and each County Emergency Management Office (EMO).

## EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

### Sub-element 1.c - Direction and Control

***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. (NUREG-0654, A.1.d; A.2.a., b)***

**Extent-of-Play Agreement:**

- The State Controller will inject free play messages to the County Emergency Management Director or designee for action.
- Public Inquiry messages will be injected at the JNC by a "control cell."

## EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

### Sub-element 1.d – Communications Equipment

***Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations. (NUREG-0654, F.1, 2)***

**Extent-of-Play Agreement:**

- The use of RACES as a back up to commercial telephones or radios will be demonstrated between the State and four Risk County EOCs only.

## EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

### Sub-element 1.e – Equipment and Supplies to Support Operations

***Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654, H.7, 10; J.10.a, b, e, J.11; K.3.a)***

**Extent-of-Play Agreement:**

- Maps and displays will vary with each facility and may include printouts and listings.
- The instruments that are used for field monitoring are the RO-2A (Gamma and Beta-milliRoentgen per hour [mR/hr] or Roentgen per hour [R/hr]) or equivalent and RM-14 (Gamma and Beta – Counts Per Minute [CPM)] or equivalent.
- Field team equipment is calibrated by Indian Point 2's (IP2) Radiation Protection Department. An internal IP2 requirement provides for calibration of this equipment every six months. Therefore, the calibration sticker for this equipment shows a "calibration due date" which reflects the six month calibration schedule. The instruments are considered calibrated as long as the current date is within one year of the calibration date.
- No equipment (Barriers, Traffic cones, Signs, etc.) will be deployed to the field.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION MAKING

### Sub-element 2.a – Emergency Worker Exposure Control

***Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure 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. (NUREG-0654, J.10.e, f; K.4)***

**Extent-of-Play Agreement:**

- All activities will be based on the ORO's plans and procedures as they would in an actual emergency.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

### Sub-element 2.b – Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency

***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 onsite and offsite environmental conditions. (NUREG-0654, I.8, 10; Supplement 3).***

**Extent-of-Play Agreement:**

- Plume centerline data will be provided by the licensee field teams.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION MAKING

### Sub-element 2.b – Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency

***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). (NUREG-0654, J.9, 10.f, m)***

**Extent-of-Play Agreement:**

- An alternate to the Executive Hotline may be used to coordinate protective action decisions (PADs) among the Risk Counties and State.

- The New York State (NYS) policy regarding the use of KI for the general public is under revision.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION MAKING

### Sub-element 2.c - Protective Action Decisions Consideration for the Protection of Special Populations

***Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups. (NUREG-0654, J.9, J.10.d, e)***

**TRANSPORTATION DEPENDENT POPULATION**

**Extent-of-Play Agreement:**

- During the September 24, 2002 exercise, there will be initial contact with the transportation providers (telephone call) by the Transportation Coordinator. Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at each EOC.

- There will be no actual dispatch of vehicles during the exercise.

**NOTIFICATION OF HEARING-IMPAIRED**

**Extent-of-Play Agreement:**

- The hearing-impaired list will be available for inspection at each respective EOC. The list will be reviewed but not retained by the Federal evaluator.

- There will be no actual notification of hearing-impaired individuals during the exercise.

**NON-INSTITUTIONALIZED MOBILITY-IMPAIRED INDIVIDUALS**

**Extent-of-Play Agreement:**

- The list of non-institutionalized mobility-impaired individuals will be available for inspection at each respective EOC. The lists will be reviewed but not retained by the Federal evaluator.

- There will be no actual dispatch of vehicles for transport of non-institutionalized mobility-impaired individuals.

- During the exercise, there will be no actual contact of non-institutionalized mobility-impaired individuals identified on the list.

## SCHOOLS

**Extent-of-Play Agreement:**

- During the September 24, 2002, exercise, there will be initial contact with the schools and transportation providers (telephone call) by the School and Transportation Coordinators. Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at each EOC.

## SPECIAL FACILITIES

**Extent-of-Play Agreement:**

- During the exercise, there will be initial contact with the special facilities (telephone call). Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at each EOC.

- There will be no actual dispatch of vehicles to the special facilities.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

### Sub-element 2.d –Radiological Assessment and Decision Making for the Ingestion Exposure Pathway

> ***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. (NUREG-0654, J.9, J.11)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

### Sub-element 2.e – Radiological Assessment and Decision-Making Concerning Relocation, Re-entry, and Return

***Criterion 2.e.1: Timely relocation, 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. (NUREG-0654, I.10; J.9; M.1)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.a – Implementation of Emergency Worker Exposure Control

***Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans 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. (NUREG-0654, K.3.a, b)***

**Extent-of-Play Agreement:**

- All activities will be based on the ORO's plans and procedures as they would in an actual emergency.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.b – Implementation of KI Decision

***Criterion 3.b.1: KI and appropriate instructions are made available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized (not the general public) individuals is maintained. (NUREG-0654, J.10.e)***

**Extent-of-Play Agreement:**

- The NYS policy regarding the use of KI for the general public is under revision.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.c – Implementation of Protective Actions for Special Populations

***Criterion 3.c.1: Protective action decisions are implemented for special populations other than schools within areas subject to protective actions. (NUREG-0654, J.10.c, d, g)***

#### EVACUATION OF TRANSPORTATION DEPENDENT POPULATION

**Extent-of-Play Agreement:**

- Bus companies will be interviewed prior to the September 24, 2002, exercise as per the Offsite Extent-of-Play Activities Schedule. Additional bus company interviews will be conducted after the exercise as agreed to by FEMA, NYSEMO, and each County EMO.
- Each company will provide a dispatcher and at least five to 10 percent of that company's drivers for interview.
- A State Controller will provide the bus routes to be discussed to the bus dispatcher for the briefing of drivers.

#### NOTIFICATION OF HEARING-IMPAIRED

**Extent-of-Play Agreement:**

- The hearing-impaired list will be available for inspection at each respective EOC. The list will be reviewed but not retained by the Federal evaluator. The procedures for notification will also be discussed at the EOC.
- There will be no actual notification of hearing-impaired individuals during the exercise.

#### EVACUATION OF NON-INSTITUTIONALIZED MOBILITY-IMPAIRED INDIVIDUALS

**Extent-of-Play Agreement:**

- The list of non-institutionalized mobility-impaired individuals will be available for inspection at each respective EOC. The lists will be reviewed but not retained by the Federal evaluator.
- There will be no actual dispatch of vehicles for transport of non-institutionalized mobility-impaired individuals.

- During the exercise, there will be no actual contact of non-institutionalized mobility-impaired individuals identified on the list.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.c – Implementation of Protective Actions for Special Populations

***Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools. (NUREG-0654, J.10.c, d, g)***

### EVACUATION OF SCHOOL POPULATIONS

**Extent-of-Play Agreement:**

- Bus companies will be interviewed prior to the September 24, 2002, exercise as per the Offsite Extent-of-Play Activities Schedule. Additional bus company interviews will be conducted after the exercise as agreed to by FEMA, NYSEMO, and each County EMO.

- Each company will provide a dispatcher and at least five to 10 percent of that company's drivers for interview.

- A State Controller will provide the bus routes to be discussed to the bus dispatcher for the briefing of drivers.

### SCHOOL INTERVIEWS

**Extent-of-Play Agreement:**

- The minimum number of schools (one school per district) to be interviewed prior to the September 24, 2002, exercise is as follows:

  - Westchester County – 9 schools
  - Rockland County – 5 schools
  - Orange County – 1 school
  - Putnam County – 3 schools

  Additional school interviews will be conducted after the exercise as agreed to by FEMA, NYSEMO, and each County EMO.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.d – Implementation of Traffic and Access Control

*Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel. (NUREG-0654, J.10.g, j)*

**TRAFFIC AND ACCESS CONTROL POINTS (TCPs and ACPs)**

**Extent-of-Play Agreement:**

- During the September 24, 2002, exercise, law enforcement officials will discuss how to activate TCPs/ACPs in the field in mutually agreed upon locations. There will be two interviews of law enforcement officials per EPZ County.

- Each designated law enforcement agency will provide one officer. The State Controller will select a TCP/ACP assigned to that agency and provide this information via a free play message to the dispatcher for the briefing of the TCP/ACP officer.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.d – Implementation of Traffic and Access Control

***Criterion 3.d.2: Impediments to evacuation are identified and resolved. (NUREG-0654, J.10.k)***

**IMPEDIMENTS TO EVACUATION**

**Extent-of-Play Agreement:**

- Each of the four 10-mile plume exposure pathway EPZ counties is to demonstrate the organizational ability to deal with at least two impediments to evacuation.
- State Controllers in the County EOCs will hand the free play messages to the County Emergency Management Director or his designee for action to test the procedures for the removal of traffic impediments.
- No equipment (Barriers, Traffic cones, Signs, etc.) will be deployed to the field.
- This demonstration will not involve the dispatch of a police or other emergency vehicle to the scene of a simulated impediment. Initial contact of resource providers will be actual and some follow-up contacts may be simulated. All calls will be logged at each EOC.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.e – Implementation of Ingestion Pathway Decisions

> ***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. (NUREG-0654, J.9, 11)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.e – Implementation of Ingestion Pathway Decisions

***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. (NUREG-0654, J.9, 11)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

### Sub-element 3.f – Implementation of Relocation, Re-entry, and Return Decisions

***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. (NUREG-0654, M.1, 3.)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

### Sub-element 4.a – Plume Phase Field Measurement and Analyses

***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. (NUREG-0654, H.10; I.7, 8, 9)***

**FIELD MONITORING TEAMS**

**Extent-of-Play Agreement:**

- The monitoring teams will not be suited up in anti-contamination clothing. However, the clothing will be available for inspection.

- Field team equipment is calibrated by IP2's RP Department. An internal IP2 requirement provides for calibration of this equipment every six months. Therefore, the calibration sticker for this equipment shows a "calibration due date" which reflects the six month calibration schedule. The instruments are considered calibrated as long as the current date is within one year of the calibration date.

- The instruments that are used for field monitoring are the RO-2A (Gamma and Beta-mR/hr or R/hr) or equivalent and RM-14 (Gamma and Beta – CPM) or equivalent.

## EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

### Sub-element 4.a – Plume Phase Field Measurement and Analyses

***Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654, H.12; I.8, 11; J.10.a)***

**Extent-of-Play Agreement:**

- Plume centerline data will be provided by the licensee field teams.

## EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

### Sub-element 4.a – Plume Phase Field Measurement and Analyses

***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. (NUREG-0654, I.9)***

### FIELD MONITORING TEAMS

**Extent-of-Play Agreement:**

- Each EPZ County will dispatch two radiological monitoring teams. Each team will be supplied with a State Controller and FEMA evaluator.

- The monitoring teams will not be suited up in anti-contamination clothing. However, the clothing will be available for inspection.

- Each team will take at least two ambient radiation measurements and at least two air samples. All teams must take the air samples as though they were in the presence of the plume (even County teams that may not be impacted by the plume).

- The use of silver zeolite cartridges will be simulated and charcoal cartridges will be used. However, the silver zeolite cartridges will be available at dispatch point of kit.

- There will be no actual packaging or transport of samples to the laboratory. EOC staff will be questioned only regarding means of transportation of air samples to a central point and the location of the laboratory. Field teams will demonstrate how to obtain air samples during the exercise and will be questioned only regarding the procedures for the pick-up point of air samples.

## EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

### Sub-element 4.b – Post Plume Phase Field Measurements and Sampling

***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. (NUREG-0654, I.8; J.11)***

Not to be demonstrated at this exercise.

## EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

### Sub-element 4.c - Laboratory Operations

***Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions. (NUREG-0654, C.3; J.11)***

Not to be demonstrated during this exercise.

## EVALUATION AREA 5: EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

### Sub-element 5.a – Activation of the Prompt Alert and Notification System

***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 FEMA REP guidance. (10 CFR Part 50, Appendix E.IV.D; NUREG-0654, E.5, 6, 7)***

**Extent-of-Play Agreement:**

- There will be no actual siren sounding and no broadcasting of Emergency Alert System (EAS) messages. The Indian Point siren system was last tested on March 6, 2002.
- Airing of the initial EAS message will be simulated.
- Contact with the radio station for subsequent EAS messages will be simulated.
- Regular programming responsibilities of the radio station may preclude participation at the time of the issuance of the simulated EAS message.

## EVALUATION AREA 5: EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

### Sub-element 5.a – Activation of the Prompt Alert and Notification System

*Criterion 5.a.2: RESERVED*

## EVALUATION AREA 5: EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

### Sub-element 5.a – Activation of the Prompt Alert and Notification System

***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. (NUREG-0654, E. 6; Appendix 3.B.2.c)***

**Extent-of-Play Agreement:**

- There are no exception areas that require supplementary route alerting.

## EVALUATION AREA 5: EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

### Sub-element 5.b – Emergency Information and Instructions for the Public and the Media

***Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner. (NUREG-0654, E. 5, 7; G.3.a, G.4.c).***

**PUBLIC INSTRUCTION AND EMERGENCY INFORMATION**

**Extent-of-Play Agreement:**

- "EAS Follow-on News Releases" are provided to WABC Radio only and the media at the JNC.

**EMERGENCY INFORMATION**

**Extent-of-Play Agreement:**

- Orange County will utilize a videoconference link from the County EOC to the JNC.

**PUBLIC INQUIRY**

**Extent-of-Play Agreement:**

- The public inquiry function will be staffed by at least six operators with one supervisor.
- Inject messages will indicate false or misleading information to enable the public inquiry function to identify trends and false rumors.

## EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

### Sub-element 6.a – Monitoring and Decontamination of Evacuees and Emergency Workers and Registration of Evacuees

***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. (NUREG-0654, J.10.h; J.12; K.5.a)***

**Extent-of-Play Agreement:**

- Reception centers will be demonstrated prior to the September 24, 2002, exercise as per the Offsite Extent of Play Activities Schedule. Additional reception centers will be evaluated (baseline evaluations) after the exercise as agreed to by FEMA, NYSEMO, and each County EMO.

- At least 1/3 of the required monitors will be present and at least six simulated evacuees will be monitored.

- Initial personnel monitoring staff will be demonstrated as tabulated below. Staff will be provided to simulate evacuees.

| Number of Persons for Initial Personnel Monitoring | | | | |
|---|---|---|---|---|
| **Category** | **Orange County** | **Rockland County** | **Westchester County** | **Putnam County** |
| **Radiological monitors for initial monitoring** | **2** *(See Note 1)* | **3** *(See Note 4)* | **3** *(See Note 4)* | **2** *(See Note 1)* |
| **Recorders** | **1** *(See Note 2)* | *(See Note 2)* | **2** | *(See Note 3)* |
| **No. of Portal Monitors** | **1** | **2** | **2** | **1** |

*Note 1: One monitor for portal monitoring; one monitor for hand-held monitoring.*

*Note 2: Evacuees will be monitored, then either given a "clean" card or directed to decontamination area.*

*Note 3: Evacuees will be monitored, then either hand-stamped clean or directed to decontamination area.*

*Note 4: Two monitors for portal monitoring, one monitoring for hand-held monitoring.*

- At a minimum, the additional monitoring personnel will include:

  - 4 monitors for decontamination (2 male and 2 female)
  - 1 monitor for vehicle monitoring
  - 1 monitor for vehicle decontamination

- With regard to registrars (social services), the following staffing will be present at a minimum:

  - 1 individual, Orange County
  - 2 individuals, Rockland County
  - 1 individual, Putnam County
  - 2 individuals, Westchester County

- Each vehicle monitor will process at least two vehicles.

- There will be only a representative (small) sample of supplies available at each facility.

- Decontamination techniques will be simulated. At the Personnel Monitoring Center (PMC), activities that may damage property (such as parking vehicle on grass) are to be simulated.

- The monitoring and decontamination teams will not be suited up in anti-contamination clothing. The Federal evaluator may request one monitor to suit-up in anti-contamination clothing for demonstration purposes.

- Reception center floors will be covered with a representative sample of paper/plastic during this demonstration. However, all required materials will be available for inspection.

- Both male and female decon technique will be demonstrated, though only one decon area will be set up.

- Portal monitors will be operated in accordance with manufacturer specifications. Portal monitors are checked with a check source to verify operability.

## EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

### Sub-element 6.b – Monitoring and Decontamination of Emergency Worker Equipment

***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. (NUREG-0654, K.5.b).***

**Extent-of-Play Agreement:**

- Emergency Worker Personnel Monitoring Centers (EWPMC) will be demonstrated prior to the September 24, 2002, exercise as per the Offsite Extent-of-Play Activities agreement Schedule.

- Each facility will demonstrate the following:

  - 1 monitor for personnel monitoring
  - 2 monitors for personnel decontamination (1 male and 1 female)
  - 1 monitor for vehicle monitoring
  - 1 monitor for vehicle decontamination

- The monitoring and decontamination teams will not to be suited up in anti-contamination clothing. However, the Federal evaluator may request one monitor only to suit-up in anti-contamination clothing for demonstration purposes.

- Decontamination actions are to be simulated. At the PMC, activities that may damage property (such as parking vehicles on grass) are to be simulated.

- EWPMC floors will be covered with a representative sample of paper/plastic during this demonstration. However, all required materials will be available for inspection.

- One portal monitor for personnel monitoring will be demonstrated by Rockland County and Orange County.

- Both male and female decon technique will be demonstrated, though only one decon area will be set up.

- The portal monitor will be operated in accordance with manufacturer specifications. Portal monitors are checked with a check source to verify operability.

## EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

### Sub-element 6.c - Temporary Care of Evacuees

***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. (Found in MASS CARE-Preparedness Operations, ARC 3031.) 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. (NUREG-0654, J.10.h, J.12)***

**Extent-of-Play Agreement:**

- Congregate care centers will be demonstrated prior to the September 24, 2002, exercise as per the Offsite Extent-of-Play Activities Schedule. Additional congregate care centers will be evaluated (baseline evaluations) after the exercise as agreed to by FEMA, NYSEMO, and each County EMO.

- Capabilities will be demonstrated through an interview process. Personnel, at a minimum, will consist of one Manager and Assistant for each congregate care center opened.

- Availability of additional personnel will be determined by interview discussion.

- One individual may perform two functions (e.g. Shelter Manager could also serve as communicator).

- Supplies required for long-term mass care (cots, blankets, food, etc.) are <u>not</u> to be acquired or brought to the congregate care centers.

## EVALUATION AREA 6: SUPPORT OPERATION/FACILITIES

### Sub-element 6.d - Transportation and Treatment of Contaminated Injured Individuals

***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. (NUREG-0654, F.2; H.10; K.5.a, b; L.1, 4)***

**Extent-of-Play Agreement:**

- The use of flashing lights and sirens for exercise play is <u>not</u> required.

# APPENDIX 4

## 2002 EXERCISE SCENARIO
## INDIAN POINT ENERGY CENTER, UNIT 2

**Initial Condition**

The Indian Point Energy Center Unit 2 has been operating at full power for 120 Effective Full Power Days. The #23 Charging Pump is out of service for a scheduled 5-year overhaul. The 13.8 KV feed to Unit 2 has been out of service for 24 hours for bushing replacement on the auto transformer. A 72 hour Limiting Condition of Operation (LCO) is in effect per Technical Specifications 3.7.B.2. The following breakers are open and racked out for the transformer work: 52GT25; 52GT26; 52GT2; 52GT/BT.

**Narrative Summary**

A fault occurs on Bus 3A. Emergency Diesel Generator #23 trips on over crank. An investigation will determine that there is a blockage in the fuel line at the duplex fuel filter. Emergency Diesel Generator #23 will not be returned to service before 12:45.

Reactor Coolant Pump #23 trips, causing Turbine/Reactor Trip. A loss of 138 KV power occurs when the Generator Output breakers open. Emergency Diesel Generator #22 breaker to 480V Bus 2A fails to close. Investigation will determine that the cell switch is bad. Repair is not expected until 12:45. An **ALERT** will be declared based on **EAL 6.1.3.**

Weld Channel Zone 2 will develop a high flow condition.

Containment Radiation Monitors R-25 and R-26 will increase to greater than 68 R/hr. A **General Emergency** will be declared based on **EAL 2.2.3.** Initial protective action recommendations will be developed and transmitted to the offsite authorities.

Weld Channel Zone 2 will lose pressurization and a radiological release through the plant vent will be identified. Based on the release, the protective action recommendations will be upgraded and transmitted to the offsite authorities. Investigation will determine that pressure regulator PCV-1195 has failed closed. Zone 2 will be repressurized.

The Exercise scenario will end when the radiological release is terminated and cold leg recirculation has been established.

The Exercise will end when all objectives have been given ample opportunity for demonstration by BOTH onsite and offsite responders.

**Exercise Protective Action Recommendations**

**Initial Protective Action Recommendations** will be based on Plant Conditions in accordance with Procedure IP-EP-410, Protective Action Recommendations and will occur at the declaration of a General Emergency at approximately 12:30 p.m. Those protective action recommendations will include the following ERPAs due to the wind direction of 205 degrees @ about 12 mph and Pasquill Category C.

1, 2, 3, 4, 7, 8, 9, 16, 18, 29, 30, 38, 39, 43, and 44

**Upgraded Protective Action Recommendations** will be based on the initiation of a radiological release and in accordance with Procedure IP-EP-410, Protective Action Recommendations. It will occur at approximately 13:50. Those protective action recommendations will include the following ERPAs due to the wind direction of 205 degreed @ about 12 mph and Pasquill Category C.

1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 16, 17, 18, 19, 19, 20, 23, 24, 26, 29, 30, 31, 38, 39, 40, 43, 44, 45, 46, 47, 48, and 49

(The underlined ERPAs are the additional ERPAs recommended to evacuate due to the radiological release.)

## 2002 NRC/FEMA Exercise Scenario Timeline

**Initial Conditions**

Indian Point is at 100% Power for 120 Effective Full Power Days
#23 Charging Pump is out of service for pump schedule 5-year overhaul.
13.8 KV feed to Unit 2 has been out of service for 24 hours for bushing replacement on the auto transformer. A 72 Hr LCO is in effect per TS 3.7.B.2. The following 13.8 KV breakers are open and racked out for the transformer work:
52GT25, 52GT26, 52GT2, 52GT/BT

**Meteorological Conditions**

Wind direction is from 205 degrees at about 12 mph. The temperature is 70 F with clear skies.

**Forecast** – The long-term meteorological forecast will indicate that the wind direction will to the WNW that evening.

**Scenario Timeline**

08:00 Provide initial conditions to Control Room (Simulator Personnel)

08:20 A fault occurs on 480V Bus 3A. Emergency Diesel Generator #23 trips on over crank. Investigation will determine that there is a blockage in the fuel line at the duplex fuel filter. EDG #23 will not be returned to service before 12:45.

08:30 Reactor Coolant Pump #23 trips causing Turbine/Reactor Trip. A loss of 138 KV power occurs when the Generator Output breakers open. EDG #22 breaker to 480V Bus 2A fails to close. Investigation will determine that the cell switch is bad. Repair is not expected until 12:45. **An ALERT will be declared based on EAL 6.1.3 (~08:45).**

10:45 A Large Break LOCA occurs. Due to electrical failures, only #21 SI Pump will run. RVLIS level will decrease <41% and an Orange Path for Core Cooling will be identified. **A SITE AREA EMERGENCY will be declared based on EAL 1.2.1 (~11:00).**

11:15 Weld Channel Zone 2 will develop a high flow condition.

12:15 Containment radiation monitors R-25 and R-26 will increase > 68 R/hr. **A GENERAL EMERGENCY will be declared based on EAL 2.2.3 (~12:30). Protective Action Recommendations are provided.**

13:50 Weld Channel Zone 2 will lose pressurization and a release through the plant vent will be identified. **Protective Action Recommendations will be upgraded and provided.**

Investigation will determine that pressure regulator PCV-1195 has failed closed. Zone 2 will be repressurized at 15:15 terminating the release.

15:15 The scenario will end when the release is terminated and cold leg recirculation has been established.

**~15:30 The Exercise will end when all objectives have been given ample opportunity for demonstration by BOTH onsite and offsite responders.**

## INDIAN POINT ENERGY CENTER UNIT 2

## 2002 EXERCISE SCENARIO

## TIMELINE

| | |
|---|---|
| ~08:00 A.M. | Initial Conditions at the Plant |
| ~08:45 A.M. | Alert |
| ~11:00 A.M. | Site Area Emergency |
| ~12:30 P.M. | General Emergency – Initial PARs issues |
| ~1:50 P.M. | Radiological Release Begins – Updated PARs issued |
| ~3:15 P.M. | Radiological Release Terminated |
| ~3:30 P.M. | End of Exercise |

## INDIAN POINT ENERGY CENTER UNIT 2

## 2002 EXERCISE SCENARIO

## METEOROLOGICAL CONDITIONS

Wind direction will be toward the NNE (Westchester and Putnam Counties) at about 12 mph. The winds will remain in that direction for the remainder of the exercise. The long-term meteorological forecast will indicate that the wind direction is expected to shift to the WNW that evening.

| Time | Wind Direction | Wind Speed | Pasquill Category |
|---|---|---|---|
| 0800 | 205 | 12 mph | C |
| 0900 | 205 | 12 mph | C |
| 1000 | 205 | 12 mph | C |
| 1100 | 205 | 12 mph | C |
| 1200 | 205 | 12 mph | C |
| 1300 | 205 | 12 mph | C |
| 1400 | 205 | 12 mph | C |
| 1500 | 205 | 12 mph | C |
| 1600 | 205 | 12 mph | C |
| 1700 | 205 | 12 mph | C |
| 1800 | 150 | 10 mph | C |
| 1900 | 150 | 10 mph | C |

# APPENDIX 5

## PRIOR ISSUES NOT SCHEDULED TO BE DEMONSTRATED

This appendix contains the description and status of ARCAs that were assessed during prior exercises at Indian Point 2 Nuclear Power Station. They were assessed either at jurisdiction or functional entities exempt from demonstration at this exercise or for ingestion exposure pathway objectives not scheduled for demonstration during this exercise.

## PRIOR ISSUES AT JURISDICTION OR FUNCTIONAL ENTITIES NOT SCHEDULED TO BE DEMONSTRATED

### New York State Emergency Operations Center

**Issue No.:** 32-99-29-A-01

**Description:** Implementation issues associated with relocation and re-entry were not adequately communicated to the staff or public, and not fully coordinated with other organizations, such as the counties.

Key decisions and instructions were not communicated to the staff or the public for proper implementation. For example, although the public was instructed to relocate from hotspots A and B, the evacuees were not provided with the length of time the relocation was estimated to last (over one year), or of the preparedness actions to take for such an extended evacuation.

Also, implementation of protective actions was not fully coordinated with other organizations, such as the affected counties. For instance, implementation of the re-entry policy, which varied among the counties involved, was not fully discussed and coordinated.

ATTACHMENT B

# FEMA Reviews of the State and County Radiological Emergency Response Plans for the Indian Point Energy Center and Comments on the REP Program, Planning and Exercise Issues Raised by Others

## February 21, 2003

### Executive Summary

The Federal Emergency Management Agency (FEMA), Region II, assisted by the Regional Assistance Committee (RAC) has completed a review of the most recent State and county Radiological Emergency Preparedness Plans (REPPs) for the Indian Point Energy Center. FEMA has also reviewed comments made in the report to the Governor's Office of the State of New York, "Review of Emergency Preparedness at Indian Point and Millstone," Draft, dated January 10, 2002, prepared by James Lee Witt Associates, LLC (herein referred to as the Draft NY State Report.).

It is noted that the Draft NY State Report's review of the State and four county radiological emergency response plans makes some of the same findings of our own review submitted to the State of New York on January 15, 2002, although FEMA's review is more comprehensive. Having had an independent reviewer identify similar findings validates our review. The State of New York and the counties of Putnam, Orange, Rockland, and Westchester have been working to address FEMA's previously identified plan issues. Our recent review of the plans indicates that many of the issues raised in the original FEMA/RAC Plan Review have now been addressed by the counties and the State has committed to addressing concerns with the State plans.

However, the Draft NY State Report contains several discrepancies regarding Indian Point and the Radiological Emergency Preparedness (REP) program. This review is organized into 5 parts. First are the updated FEMA reviews of the State and County REPPs. Parts 2, 3, 4 and 5 contain FEMA and the RAC's comments on the NY State Report. Part 6 has comments on the 44 CFR 350.13 Petition for Withdrawal of FEMA Approval of the Indian Point Radiological Emergency Preparedness Plan of June 17, 2002.

# Report Contents

1. FEMA/RAC Reviews of the State and County Radiological Emergency Preparedness Plans for the Indian Point Energy Center including comments from the NY State Report

   A. State of New York
   B. Putnam County
   C. Orange County
   D. Rockland County with Bergen County Host County Procedures
   E. Westchester County

2. FEMA/RAC General Comments on the Draft NY State Report

3. FEMA Comments on NY State Report, Appendix G – FEMA Exercise Report Findings

4. FEMA Comments on NY State Report, Appendix I – 2002 IP Practice and Full-Scale Exercise Observations

5. FEMA Comments on NY State Report – Appendix J – Advocacy Issues

6. FEMA Comments on 44 CFR 350.13 Petition for Withdrawal of FEMA Approval of the Indian Point Radiological Emergency Preparedness Plan, June 17, 2002

## 1. FEMA/RAC Reviews of the State and County Radiological Emergency Preparedness Plans for the Indian Point Energy Center including comments from the Draft NY State Report

FEMA's reviews of the State and county radiological emergency preparedness plans follow. The reviews were originally prepared as an in-depth review of the plans submitted in 2000. The plans, or plan changes, that were submitted in 2002 have been reviewed and the plan review updated accordingly. The focus during the re-review has been on those areas that were previously identified as incomplete or inadequate. Many of those areas have been addressed; some have not. In particular, the plan for Westchester will need to be re-evaluated once an updated cross-reference to guidance is provided; the changes to the format of the 2002 plan made it nearly impossible to review against FEMA's review of the 2000 plan.

In addition, the findings of the Draft NY State report on the plans have been incorporated into the reviews. In many cases the Draft NY State report's findings validated our own. In others, the FEMA review shows that the more comprehensive review of the plans done by FEMA revealed information that the State's reviewers did not locate in the plans.

(Please insert plan reviews (5 files) here.)

## 2. General FEMA/RAC Comments on the Draft NY State Report

The Draft NY State Report[1] raises a number of issues that are worth considering for plan enhancements, such as: better education of the public, especially transients, more training of offsite responders, better emergency communications and more planning involvement with cities and larger employers, etc. Included as an attachment are a listing of sound findings and recommendations from the NY State Report that FEMA agrees with and will pursue where appropriate. The issues identified are generic issues that continue to challenge emergency planners everywhere and are not unique to Indian Point. When updated and exercised appropriately plans and efforts in place across the nation are adequate to meet the intent of the planning guidance, however, additional efforts can and should be made, particularly, in making better use of available technology and experience in this area. The benefits of involving larger numbers of stakeholders in adding constructively to the overall process are significant. Consideration of family protection plans could bolster the confidence of the public that designated responders would be available if their families' protection was better assured.

This said, the following comments were prepared by FEMA and the Regional Assistance Committee and are provided in response to the stated facts, perceptions and conclusions in a number of areas in the draft report.

- *The Draft NY State report concluded that "the current radiological response system and capabilities are not adequate to overcome their combined weight and protect people from an unacceptable dose of radiation in the event of a release from Indian Point, especially if the release is faster or larger than the design basis release."*

  The emergency plans developed by the utility, state and counties around Indian Point are adequate to protect the public health and safety if updated and exercised consistent with current guidelines. FEMA, with the assistance of the Regional Assistance Committee (RAC), a panel of experts in various aspects of emergency preparedness from a number of Federal agencies, periodically reviews the state and county plans and has evaluated numerous exercises over the years. These reviews and exercise evaluations consistently indicated that the emergency response plans for Indian Point area provided a sound framework for effective decision-making and implementation of essential emergency preparedness functions, regardless of the initiating event. While there are currently absent documents identified by the FEMA Plan Reviews (see Section 1 of this report), in general the IP plans and procedures have been found to be adequate.

  NRC regulations require that comprehensive emergency plans be prepared and periodically exercised to assure that actions can and will be taken to protect

[1] "Review of Emergency Preparedness at Indian Point and Millstone – Draft," James Lee Witt Associates, LLC, January 10, 2003.

citizens in the vicinity of a nuclear power plant. Emergency response plans are periodically updated and are designed to be flexible enough to respond to a wide variety of adverse conditions, including a terrorist attack. The planning process has demonstrated its robustness and ability to evolve and improve during the years since the Three Mile Island accident. The coordinated response to contain or mitigate a threatened or actual release of radioactive material would be essentially the same whether it resulted from an accidental or terrorist act. Further, it should be stated that every biennial exercise has used releases or potential releases that require an evacuation of at least a portion of the planning zone.

- *The Executive Summary of the Draft NY State Report identifies the need to consider terrorism annexes or components to the plans.*

  The Draft NY State Report does not account for the significant security measures that have been put in place since the terrorist attacks of September 11, 2001. Immediately after the attacks, the NRC advised plant operators to implement the highest level of security. Additionally, the NRC staff undertook a comprehensive evaluation of NRC's security and safeguards program. On February 25, 2002, the NRC issued orders to all operating commercial nuclear power plants to implement interim compensatory security measures for the current threat environment, which included security enhancements which have emerged from the NRC's ongoing comprehensive security review. These requirements include increased patrols, augmented security forces and capabilities, additional security posts, installation of additional physical barriers, vehicle checks at greater standoff distances, enhanced coordination with law enforcement and military authorities, and more restrictive site access controls for all personnel. The order also directed licensees to evaluate and address potential vulnerabilities of spent fuel pools and the reactor plant itself, and to develop specific guidance and strategies, such as to respond to an event that damages large areas of the plant due to explosions or fire. Additionally, the order directed licensees to take specific actions as appropriate to ensure continued improvements to existing emergency response plans. Entergy and Dominion are both in full compliance with the order and enhanced security measures are in place at Indian Point and Millstone.

  In addition, the NRC has been working closely with numerous Federal agencies, including the Department of Defense, Department of Homeland Security, Department of Energy, Federal Emergency Management Agency, Federal Bureau of Investigation, and Federal Aviation Administration to develop interagency response procedures and enhancements. The NRC is also working with State governments to enhance security of nuclear facilities and activities.

- *The Draft NY State Report compared the licensee's as well as the county and State emergency preparedness plans against the stated criteria in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological*

*Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."*

As noted above in the Section 1, Plan Reviews, efforts should have been made by the authors of the NY State Report to verify their concerns with the plans before characterizing each as 'not meeting' requirements. The authors of the NY State Report did not include a review of the procedures that are an integral part of the plan and where many of the details of what is to be done are included. By this approach, the report does the public a disservice when referring to requirements not being met in "Appendix C: Individual Plan Review Compliance Matrices." Additionally, strict interpretation of this NUREG does not consider the numerous improvements and enhancements made to the emergency planning process, and incorporated in Supplements to NUREG-0654/FEMA-REP-1, FEMA Guidance Memoranda and other documents, since the publication of NUREG-0654/FEMA/REP-1 in 1980. The purpose of NUREG-0654/FEMA-REP-1 is to provide a basis for NRC licensees, State and local governments to develop radiological emergency plans and improve emergency preparedness.

- *Sheltering as part of the protective action strategy is discussed in many areas of the NY State Report. The lack of active consideration of sheltering as part of the emergency preparedness planning process is identified as a concern.*

The State and county plans utilize sheltering, both for selected populations and for general populations as part of the protective action strategy under various emergency conditions. The conditions for use are described in the plans. Research and experience has led to a change in the strategy for use of sheltering as described below.

NUREG-0654, Appendix 1 provides guidance on the application of evacuation and sheltering as protective measures for a radiological event. Information Notice 83-28 was issued on May 4, 1983 to provide additional clarification of the guidance. Following the EPA updated guidance on protective action guidelines and protective actions for nuclear incidents, and more than ten years of drill and exercise experience the guidance was further enhanced and clarified. In 1996, the NRC published Supplement 3 to NUREG-0654.FEMA-REP-1, "Criteria for Protective Action Recommendations for Severe Accidents" Draft Report for Interim Use and Comment. This report states "Since the publication of the original guidance in NUREG-0654, extensive studies of severe reactor accidents have been performed. These studies clearly indicate that for all but a very limited set of conditions, prompt evacuation of the area near the plant is much more effective in reducing the risk of early health effects than sheltering the population in the event of severe accidents. In addition, studies have shown that except for very limited conditions, evacuation in a plume is still more effective in reducing health risks than prolonged sheltering near the plant. Therefore, the NRC and FEMA recommend that the population near the plant should be evacuated if possible for actual or projected severe core damage accidents." It should be noted

that the above guidance applies to the populations most immediately at risk, nominally those within 2 miles of the plant and about 5 miles downwind from the plant. Persons in the remainder of the plume exposure pathway emergency planning zone are directed to go indoors and listen to the Emergency Alert Stations for additional directions (i.e., Shelter). The principal protective actions of evacuation and sheltering, used during the early phase are applied when and where each can provide the optimum benefit for the circumstances. The guidance clearly indicates that sheltering in close proximity to the plant should be used when (environmental) conditions make evacuation more dangerous. Additionally, for releases that are short-term (puff), of predictable duration, sheltering may be the appropriate recommendation. In those areas not immediately affected by the (potential) release, use of sheltering ensures members of the public have access to updated event information.

- *Throughout the Draft NY State Report concerns are expressed with the protective action decision and implementation process. For example, in Chapter 4 page 60 of the report, states "Calculations of the optimal strategies for protecting the public safety and health are best done during the planning phase and incorporated into the emergency plans. There are no such comprehensive analyses incorporated as a part of the plans for the Indian Point facility, counties, or the State of New York."*

  Comprehensive analyses have been performed and the results have been incorporated into the onsite and offsite emergency plans. There is extensive federal and industry guidance that assists licensees in developing the bases for event classifications and protective action recommendations. NUREG-0654/FEMA-REP-1, dated October 1980, identifies multiple criteria that correspond to event severity levels, such as Unusual Event (UE), Alert, Site Area Emergency (SAE), and General Emergency (GE). These severity levels form the bases for the actions, if any, to be taken in the event of an accident at a nuclear power plant. These are referred to as emergency action levels (EALs) which specify abnormal plant conditions and classify them according to the related severity level. These EALs encompass a spectrum of events, from security threats to a large break loss of coolant accident, and direct the operators to appropriate severity classification. The severity level classification of the event dictates the onsite actions, including the notification of responders and offsite authorities, recommending onsite and offsite protective actions, etc. Licensee personnel are evaluated during drills and exercises on their ability to correctly classify an event and to make the appropriate and timely protective action recommendations to the offsite authorities. The offsite organizations are well aware of the utility's classification system, use a common handbook on the EAL/classification system, and have plans geared to take specific actions based on this scheme.

  In addition, the report suggests that different emergency plans should be developed for plants in large population areas. When emergency plans are developed, and as they are reviewed and revised, consideration is given to the

unique features of each site, such as population density, river valleys, coastlines, mountains, etc. This process considers any unique features and assures that they are appropriately accommodated.

- *In the discussion on page 26, Section 3.5, of the Draft NY State Report, "Offsite Accident Impact Analysis Review," the authors state that "Once accident impact analysis (or dose assessment) has been done, emergency managers can recommend public protective evacuation or sheltering in an attempt to reduce the doses received by the public and the consequences of the release. The decisions made in the early phase (usually considered to be the first four days) are largely dependent on observations made by plant personnel (e.g., "there's a breach to the containment vessel") and computer modeling using current meteorological data and estimates of the source and quantity of radioactive material to project where a plume might be headed."*

  By basing the recommendations to the offsite authorities on plant conditions, rather than waiting for a release or dose projections, potentially impacted public can be evacuated before a release takes place, or earlier than could occur if dose projections were used. The nuclear power plant licensee must make the notification of a GE in addition to recommended protective actions within 15 minutes of the declaration of a general emergency, whether the GE occurs as the result of slowly degrading plant conditions or a sudden, catastrophic plant event. The protective action recommendation process has been identified by the NRC as an important part of emergency response. Utility personnel are evaluated on their ability to correctly classify an event and to make appropriate protective action recommendations in a timely manner (about 15 minutes). These initial protective action recommendations are based upon degrading plant conditions rather than waiting for dose assessment results or field monitoring information.

- *The Draft NY State Report describes general problems with the dose assessment and plume modeling process. These include, but are not limited to, inability to include wind shifts in plume modeling, terrain effects, lack of standardization of dose assessment models, and dose attainment time.*

  The NRC regulations require that licensees have "Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use."[2] Variations, such as wind direction, plume meander, terrain effects, will occur and most models are unable to project the exact location of the plume meander. The NRC recommendation from NUREG-0654/FEMA-REP-1, Supplement 3, accounts for such variability by recommending a "keyhole" strategy for protective actions. The keyhole strategy is evacuation of the 2-mile ring around the plant site and 5 miles downwind in the affected and the two adjacent sectors. Such a strategy is

[2] 10 CFR 50.47(b)(9)

conservative, and results in the early evacuation of the population most at risk from a potential release from the plant. The keyhole encompasses any plume meander caused by micro-meteorological effects as well as terrain effects that the plume model may not directly include.

- *An ongoing concern in the communities surrounding Indian Point and Millstone, and identified in the Draft NY State Report is the time to evacuate and the ability of the population to evacuate in the unlikely event of an accident at either reactor (site). Evacuation concerns include limited roadways, high population density, adverse weather impacts, shadow evacuation and out dated evacuation time estimates (ETEs). Additionally, on page 87, the report states "For a successful evacuation to occur, the population must clear the affected area before receiving a critical dose of radiation as specified in federal guidelines."*

  NRC regulations require that the operator of a nuclear power reactor provide an analysis of the time required to evacuate and take other protective actions within the plume exposure pathway. This analysis is referred to as the evacuation time estimate (ETE). ETEs do not reflect the ability of the population to be evacuated prior to receiving a specified radiation dose. ETEs are primarily used to identify potential traffic bottlenecks so that appropriate traffic control plans can be developed. ETEs are also used by decision-makers in determining whether evacuation or sheltering might be appropriate in a given area based on knowledge and prognosis of release timing and duration. While there are no preset minimum evacuation times that a plant site must meet, the NRC expects that the ETE for a site is a reasonably accurate reflection of the time it would take to evacuate the site environs under normal and adverse conditions.

  Nuclear power reactor licensees are expected to review and revise their ETEs for their sites. This revision must take into account changes in population, road capabilities, potential traffic impediments, and other factors affecting the ETEs. On August 21, 2001, the NRC issued Regulatory Issues Summary (RIS) 2001-16 "Update of Evacuation Time Estimates," to all holders of operating licenses for nuclear power plants. In this RIS, the NRC alerted licensees of the possible need to update ETEs as a result of the 2000 Census.

  Only a fraction of the EPZ will be in the potential pathway of the plume at any point in time due to such factors as wind direction and wind speed. This is the population for which protective actions, such as evacuation, are needed. It is possible to move out of the plume by traveling only a short distance perpendicular to the downwind direction of the plume.

- *The Draft NY State Report indicates that the reviewed emergency plans are based on a compliance rather than a protective actions outcome.*

  The emergency planning regulations were based initially on considerations of necessary actions to identify accident conditions, assess them, notify the offsite

authorities of the need to take action, and to mitigate the accident. Subsequent to the TMI-2 accident, the regulations were rewritten to take advantage of the many lessons learned. Likewise the planning guidance was pulled into a single document (NUREG-0654/FEMA REP-1, Rev.1, 1980). This document provides the guidance for the utilities, states and local organizations for use in developing their plans. Many of the resulting planning criteria were developed directly from the lessons learned from the accident and the response to it. Therefore, to speak to mere compliance to the regulations and planning guidance does a disservice. The criteria were developed based on actual experience and the protective action outcomes. It is noted that several criteria in the NUREG have been superceded by subsequent changes in the regulations. The Indian Point area plans were revised to accommodate these changes.

SPECIFIC COMMENTS

Executive Summary:

- Executive Summary, page vi, Major Findings, item 5, states that "...exercises designed to test the plans are of limited use in identifying inadequacies..." Plans are developed to indicate what is to occur and what is to be accomplished during an emergency. By exercising the plans, inadequacies are identified, participants obtain a better understanding of their emergency response functions, and methods for improvement either in plan or implementation can be refined. What is essential is that the plan accurately reflects the actions that would be taken in the event of an emergency.

- Executive Summary, page vii, Regulations, second paragraph fails to mention that the new Evaluation Criterion have a final date of publication in the Federal Register on April 25, 2002. Only the modification to the Alert and Notification is still viable and it was published on September 12, 2001.

  Furthermore the paragraph states that the new evaluation process of focusing on performance was "not found in the planning and exercising practices of the State of New York and its jurisdictions." This is an inaccurate statement. The 2002 exercise for Indian Point was based on the new evaluation process and the participants were aware and did focus on performance. Several of the jurisdiction participants discussed how improved the whole process was and how they felt they were allowed to perform their duties.

- Executive Summary, page viii, Major Conclusions, first paragraph, ignores the fact that evacuations can/will occur before there is a release. Furthermore, a release in most cases will be of limited speed and it will take time for it to move from the reactor building to the site boundary to the 10-mile boundary of the EPZ.

- Executive Summary, page viii, Major Recommendations:
  a. First paragraph – "high population areas" is not defined.

b. Second paragraph: most people in crisis will comply with official directions; i.e. hurricane or tornado warnings. An individual cannot be forced.
c. Third paragraph: "the plans should discuss and evaluate strategies for protecting people in a variety of scenarios." This is not the purpose of the plan. The Evacuation Time Study does some of this. The concept of have a variety of scenarios and strategies is good; but does not belong in the response plan as it would intrude on its usefulness in an emergency.
d. Terrorism: statements regarding terrorism could be added to the plan. However, in reality, the off-site response would be the same regarding any release from the plant. The plans, both on site and off site are public documents and specific protection strategies are classified.
e. Communications: the State and four counties do have access to direct information. The inclusion of counties outside the 10-mile EPZ occurs in the Ingestion pathway zone.
f. Exercises: second paragraph: states that the exercise program uses a functional approach to exercise evaluation. This is not correct. Furthermore, the paragraph goes on to state "...reviews the performance of the system using the functions and the points of review." There are no points of review. As the authors of this document indicated there is a new exercise methodology and it was used during the 2002 exercise. Furthermore, to state that each "...atomized function and be reviewed separately..." is unclear.
g. A further comment on page x recommends that a performance outcome-based exercise program should be developed. The author appears unaware by this statement of FEMA's updated REP exercise process. The REP evaluation process is performance and outcome based. Response Management Technologies, p. x, first paragraph: The discussion has to do with onsite response; that is, saying what Indian Point is doing. It appears that the RECS messages are at issue and if so, the statement (third sentence) in the NY State Report is only partially correct. While a hard copy is transmitted by facsimile to the State and counties, the information is previously transmitted by a dedicated phone system that is not subject to overload during an emergency. The 4$^{h}$ sentence is also not totally accurate. The MRP-DAS system, a computer link with the utility, gives almost real time (the data is a 15-min average of the instrument readings and is therefore delayed slightly) data of plant systems readings and includes the readings of the 16 radiation detectors that are placed around the site. The last sentence is also not totally accurate. In Westchester, for example, the assessment included populations impacted and projected arrival time of the plume. It should be noted that the initial PAR and PAD were well before any release and therefore at the time of the 1$^{st}$ decision there was no dose, only potential dose.
h. Response Management Technologies, p. x, second paragraph, states "Newer technologies, such as tone alert radios, have not been widely implemented." This statement is without substance and is inaccurate. Each of the four counties has tone-alert radios distributed throughout their respective emergency planning zones and this information is provided in each of the county plans. These radios are activated by the EAS signal

when an EAS message is broadcast. Tone Alert Radios have been an integral part of the ANS for many nuclear power plants for many years, including Hatch, Cooper, Woof Creek, Grand Gulf, Callaway, Indian Point, Duane Arnold, Fitzpatrick, Nine Mile, Farley, and Vogtle. The siren system around the Indian Point Energy Center is in the process of a major upgrade to include new siren components, a dedicated frequency for siren activation feedback, online monitoring capabilities, redundancy capability in every siren, and battery backup. Furthermore, in Chapter 5 of the Draft NY State Report, the authors acknowledge the use of tone alert radios and state that the approved Alert and Notification System is adequate; clearly an inconsistency within the report.

i. Response Management Technologies, p. x, third paragraph says that "Currently, the protective action decision-making process is very simplistic..." The initial utility recommendations are based on plant status almost exclusively. It is difficult to envision a case where the plant is running normally and there is a significant offsite problem. The NRC and FEMA have published the appropriate actions in Supplement 3 to NUREG-0654.

j. Response Management Technologies, p. x, fourth paragraph. Most current EOCs are functional and have periodic updates.

Chapter 1 - Introduction

- Chapter 1, page 7, 3rd paragraph, restates a given that hilly terrain may impact the effectiveness of sirens, cellular and radio communications systems. That is why there is an Alert and Notification System plan that must be approved by FEMA and is one component of the requirements to obtain a license from the NRC. Engineers knowledgeable in the effects of topography on sirens review the A&N. Later, in Chapter 5 the authors acknowledge that the Alert and Notification System is adequate.

Chapter 2 - Background

- Chapter 2, Figure 2-1 is missing the circle depicting the 10-mile radius. Figure 2-2: The distance legend and the 50-mile circle drawn are not of the same scale.

- Chapter 2, pages 15-16 are inconsistent with Executive Summary, page vi regarding the exercising of plans. According to pages 15-16, plans should simple, define emergency response roles, and be exercised. "Exercising the plan is critical to assessing its adequacy and effectiveness." In the Executive Summary states "Response exercises designed to test the plans are of limited use..." The authors are in conflict over this point.

- Chapter 2, Section 2.2, Description and Demographics of the Counties Surrounding Indian Point: It would be helpful to remind the reader that the percentages listed do not add up to 100% because the survey respondents fit into more than one category, such as those who are bilingual. Nevertheless, the data

show that there is a significant population that speaks English "less than very well," which verifies FEMA's own analysis of the results of the 2000 census on the subject of foreign language speakers within the 10-mile EPZ.

Chapter 3 – Description of the Hazard

- Chapter 3, 3.3 "Effects on Health," page 22 of the draft report identifies "Very high, short-term doses of radiation can cause early effects such as vomiting and diarrhea, skin burns, cataracts, and even death. Receiving such high doses can be compared to receiving a total of four lifetimes of normal background radiation in an extremely short time span, such as a few days or less." The report identifies the average radiation dose received yearly to be approximately 360 millirem. Acute exposure to four lifetimes of natural background radiation would be approximately 100 rem, well below the lowest entry in the table of effects located four pages later on page 26 in the draft report:

  The table of Whole Body Radiation Dose Effects:
  1,000 rem - death occurs within 30 days of exposure in 100 percent of the cases.
  450 rem - 50 percent die within 30 days of exposure, if untreated
  200 rem - 1 percent die within 30 days if untreated. Five percent suffer nausea.

- Chapter 3, page 21: The figure following Figure 3-2 needs to be labeled and titled.

- Chapter 3, section 3.4, page 24, states "The important thing to remember is that 1000 millirem add up to 1 rem-the Environmental Protection Agency Evacuation standard." The EPA has not established a standard, but a set of guides. Specifically, the EPA states in section 2.1.1, EPA 400, "These Protective Action Guidelines (PAGs) are expected to be used for planning purposes for example, to develop radiological emergency response plans and to exercise those plans. They provide guidance for response decisions and should not be regarded as dose limits. "

- Chapter 3, page 25, Figure 3-4: Levels of Acute Exposure and Health Effects: the table title needs to be revised since the table includes regulatory and background radiation levels. The portion concerning 0.5 rem is not correct. NRC regulations (10 CFR 20.1301) do contain a limit of 0.1 rem for individuals in the general public exclusive if background and medical radiation. In addition, the paragraph preceding the table describes the standards as based on doses occurring with a few hours to a day should be corrected to reflect the table content.

- Chapter 3, Table 3.1, page 26 of the draft report identified an NRC dose limit for natural background radiation (excluding man-made sources) to be 500 millirem per year. The NRC does not regulate exposure to natural background radiation. 10 CFR 20.1301 states "Each licensee shall conduct operations so that the total

effective dose equivalent to individual members of the public from the licensed operation does not exceed 0.1 rem (1 millisievert) in a year, *exclusive* of the dose contribution from background radiation . . . "

- Chapter 3, page 27, first full paragraph, first sentence: The counties should be included in this statement if their hazard assessment procedures were reviewed as well.

- Chapter 3, page 30. Throughout the report there seems to be an effort being made by the report authors to fuse the REP program with the CSEPP program; CSEPP program terminology is used with the caveat that the term is interchangeable with REP terminology. For example, on page 30 the authors chose to use a chemical plume rather than a radioactive plume to explain their point. This is misleading; the two types of plumes and their effects are quite different. If this document is for REP planners, programmers, and practitioners, all CSEPP references should be deleted.

- Chapter 3, section 3.5.1, p. 27. The seven steps shown in Figure 3-5 are not the sequence in a well structured emergency plan for a nuclear power plant. Initially, the utility goes from step one to step seven directly assuming the anomaly is of sufficient magnitude. The other 5 steps have already been considered based on best engineering judgment. After the critical initial actions are taken and data becomes available, the further analysis and possible expansion of protective actions is a part of the IPEC response plans. When discussing the ways that dose assessment is accomplished when data is available, the report accurately discusses the two methods available, a computer model and a graphic system. Most of the discussion concerns the graphic system which is the backup method. A part of the PAR process includes a circular area to a specified distance plus three 22.5 degree sectors in the downwind direction. This means that any ERPA impacted by either the circular distance and by a 67.5 degree wedge in the downwind direction, is included in the PAR

- Chapter 3, Section 3.5.4.1, the first paragraph is confusing. First it states that there is no standard model. That is true. Then it states that many computer models are "home grown," which is an unclear statement. The next sentence states that RASCAL is the most common model. This seems to be internally inconsistent.

<u>Chapter 4 – Review of Emergency Plans: Compliance With Regulations</u>

- Chapter 4, page 40, 4th paragraph and footnote; it is noted that the report authors did not use the current FDA guides that are required in the plans.

- Chapter 4, section 4.12, New York State Plan Review, identifies a "significant issue" regarding protective action guidelines [Guidance] being consistent for all the population and speaks to the concerns regarding incarcerated individuals.

Yet, in section 4.5.2.1, page 68 is a detailed discussion of the correctional facility planning. This seems to be internally inconsistent.

- Chapter 4, section 4.1.3, Putnam County Plan Review, references a "more significant issue" regarding the levels of personal protective equipment for radiological workers as identified during the plan review. The authors then continue with the statement that this did not present a significant threat so it is not mentioned. This statement is not listed in Appendix C, Table 3. This is inconsistent. First, it is considered a "more significant issue" and then the authors state "issue is not a significant threat."

- Chapter 4, section 4.4, page 59, states that there is no pre-identification of which protective actions would accomplish the best dose savings under different accident release circumstances." There is general guidance. All the variables listed by the authors are taken into account at the time of the decision.. To try to pre-determine given the vast number of variables could clog up a plan that earlier the authors indicated should be simple and easy to use. It is the responsibility of the decision-makers and dose assessment to take into account all of the variables prior to making a decision.

- Chapter 4, section 4.4, page 59, indicates that emergency managers will provide protective action recommendations to the people. At the time a protective action is told to the public, it is considered to be a protective action decision or PAD. It should be noted that while the authorized individual can make a decision, individual members of the general public may or may not act on the decision thereby treating it as a recommendation.

- Chapter 4, section 4.4, page 61 & 62, references the CSEPP method to develop protective action strategies. This "two-part" process is what the REP dose assessment and the local decision-makers already do. The authors appear to advocate "sheltering" even though NUREG-0654, Rev.1, Suppl.3, requires a default evacuation of the 2 mile ring and 5 miles downwind. The authors and particularly those with CSEPP experience should be aware that a chemical stockpile has a greater probability of exploding than a nuclear facility and thus the amount of time to discuss and decide upon a PAD differs.

- Chapter 4, section 4.4, page 63 discusses the need for a MOU among the 4 counties involved in a multi-jurisdictional evacuation. The report accurately states that the decision process is not unilateral for any County. Each of the Counties is well aware of the decisions and the evacuation routes of the other Counties. The statement about there being benefits of having up to date MOUs is made without justification or an explanation of what is not currently being accomplished.

- Chapter 4, section 4.5.1. The authors essentially recommend a change in FEMA policy that the medical facilities exercise their radiological portion of their plans

more frequently than once every 2 years. It is important to note that the medical facilities do radiological drills every year as part of normal practice; FEMA is often invited to evaluate the off-year drills and does so when asked.

Chapter 5 – Emergency Planning Bases and Systems

- Chapter 5, section 5.1, page 78, indicates that the EPZ population has increased 7.3 percent. The report, without citing existing policy, indicates this requires an update. NUREG/CR-4831, "State of the Art in Evacuation Time Estimate Studies for Nuclear Power Plants," (March 1992) states that if there is a difference of 10 percent plus or minus than new evacuation time estimates are required. Prudent planners would develop a new ETE based on the percentage and Indian Point has done so although this is not acknowledged in the report. In addition, comments regarding development of evacuation time estimates and not mixing transient with the permanent population indicates a lack of familiarity with the guidance on what is to be considered in an evacuation time estimate as set out in Appendix 4 of NUREG-0654/FEMA-REP-1.

- Chapter 5, section 5.2.4, page 95, indicates that by "evaluator observations only Westchester County used the ETE in decision-making." This is not true. The decision-makers in the counties used the ETE throughout the exercise in making decisions.

- Chapter 5, section 5.3.1, page 106 indicated that the NRC had a problem with the maintenance of Personal Home Alert Devices (PHADs) in use at Indian Point. The NRC has not identified any problems with such devices at Indian Point. PHADs are not used by Indian Point as part of the Alert Notification System.

- Chapter 5, section 5.4.3.1, page 131, and Chapter 8, page 187, first mixes observations that should be in Appendix C with their summary and secondly states that Putnam County had a problem with the primary or Executive Hotline telephone system. This is inaccurate. Orange County had the problem and thus all the counties switched to the back system so that Orange County would be on line. Furthermore, there was a speaker system as all decision-makers could hear the discussion during the exercise.

Chapter 6 – Review of Indian Point and Millstone Training Programs

- Chapter 6, page 145, states that "The Nuclear Regulatory Commission requires tests to ensure that training has been effective. Qualification examinations are required by position. These tests must be sufficiently different from year to year. The qualification examinations are required at specified frequency to ensure that skills and knowledge are retained." The NRC does not require tests or qualification examinations for emergency response organization personnel. The requirements for training for emergency response personnel are contained in 10 CFR 50.47(b)(15) and Appendix E to 10 CFR 50. The NRC evaluates the

(licensee's critique of the) performance of the emergency preparedness personnel in key areas such as classification of emergencies, notification of offsite authorities, and development of protective action recommendations.

Chapter 8 – Review of Previous Inspection and Exercise Reports

- Chapter 8, section 7.2.1, page 151 indicates that the Public Information Brochure should include all the steps taken during the evacuation of students and "thus fails to educate residents on the emergency response plan." This ignores the fact that schools provide parents with information regarding inclement weather or other emergencies, including radiological emergencies, at the beginning of each school year. Also, FEMA encourages parents to speak with their chld's school to learn what will occur during an evacuation. (Citizens Corps materials)

- Chapter 8, section 8.1.4, page 169 indicates that the evaluation process uses "objectives." However, the new exercise evaluation methodology does not rely on "objectives" or "points of review", but is a performance based outcome approach

- Chapter 8, section 8.1.4, page 170, first paragraph, last sentence is inaccurate. "During the historical review, we identified ARCAs as well as issues that could eventually lead to an ARCA or Deficiency designation or worse--a system failure-- but were not specially labeled as ARCAs or Deficiencies." See comments on Appendix G.

- Chapter 8, section 8.1.4, page 170, third paragraph and table contain outdated and inaccurate statements based on the old exercise evaluation methodology. Since the authors observed the 2002 exercise that used the new methodology they should have included a discussion of the new system.

- Chapter 8, section 8.1.4, page 174, paragraphs 3, 4, and 5, indicate that possible shadow evacuations were not considered. However, there was discussion on this topic, at least in Putnam County. In addition, the Operations Officer and the Sheriff constantly informed the decision-makers as to any traffic congestions or other road hazards, and provided assistance in clearing impediments to evacuation.

- Chapter 8, pages 177 – 178. While it is true that the MIDAS system experienced problems in some locations in the past, requiring at least one Area Requiring Corrective Action, the report fails to note in this section that the MIDAS system has been replaced by a new system, MRP-DAS as discussed in the report in Section 3.5.1. During the 2002 exercise, the new system operated without problems and provided information to all four Counties and the State.

- Chapter 8, section 8.1.4, page 183, last paragraph, indicates that FEMA requires unannounced or "no-notice" exercises. However, the authors fail to mention that FEMA provides a 7-day window for unannounced exercises.

- Chapter 8, section 8.1.4, page 184, indicates concern over terrorism, including flying an airplane into or onto the reactor building. It should be noted that the Electric Power Research Institute has completed studies that indicate "nuclear power plants are extraordinarily strong and would prevent a release of radiation, even if struck by a large commercial airliner under the worst conditions."

- Chapter 8, section 8.1.4, page 187, ignores the FEMA initiative, "Immediate Correction of Issues." Under this policy directive, rather than wait one or two years, the training and re-demonstration can occur immediately, thus enhancing the learning curve.

- Chapter 8, section 8.1.4, page 189, provides a chart indicating the length of time it takes to issue a report. Unfortunately the authors failed to indicate that this was, for the Indian Point Exercise of November 15, 2000, the Narrative Summary Report, which includes all of the detailed write-ups. The official Final Exercise Report, which listed all of the issues, plus many corrective actions that had already been implemented and successfully demonstrated, was completed in much less time (April 2001). The initial feedback was provided earlier than that in the Draft Exercise Report, which was forwarded to the State and counties within weeks of the exercise.

Chapter 9 – Architecture for Analysing Coordinated and Integrated Response

- Chapter 9, page 192, last paragraph discussion states "We did not see site-specific outcomes defined and measured that allowed an objective qualification of the level of preparedness..." We note that the authors of the NY State Report did not participate in the post-exercise meeting with the RAC Chairman nor have they read either the Draft or the Final Exercise Report.

Chapter 10 – Exercise Analysis Using the Public Protection Performance Architecture

- Chapter 10, Page 202, Figure 10-2: A legend is needed to identify what the white, light grey and dark grey areas represent. The title is unclear.

- Chapter 10, page 202, first paragraph, second sentence: Clarify whether the Indian Point Facility notified off-site authorities with a PAR or just that a release is in progress, within about 15 minutes.

Chapter 11- Conclusions and Recommendations Regarding Public Safety

- Chapter 11, pages 206-207, consistently references compliance with regulations that looks at isolated functions rather than the "big picture." The authors do not

fully recognize that the evaluation process is a results oriented process that requires the inter- and intra-mixing of all functions in order to achieve a successful goal.

- Chapter 11, pages 207, first paragraph, the authors recommend that their recommendations will require "...a major departure from the focus on compliance and regulations...." It should be clearly understood that there are specific required regulations for emergency response around nuclear power plants that cannot be ignored or set aside. FEMA is responsible for ensuring that the health and safety of the public can be protected. To ignore or set-aside regulations would be inappropriate and a violation of FEMA's responsibility to the public.

- Chapter 11, page 208, paragraphs 3 and 4, indicate that First Responders are sent out to specific points and measure radiation. The authors indicate they did not see a need for this; however, they go on to interchange the offsite with the onsite monitors and detectors. Furthermore, they indicate they did not observe this data being provided back to Indian Point. This information is directed to the county, where dose assessment and tracking is being performed along with the IP assessment process. Each of the Counties had technical liaisons from the utility present that provided a two-way communications between the Counties and the staff in the EOF. The confusion and mixing of onsite response with off site response is consistent throughout Draft State Report. Finally, the term First Responders is misleading. A First Responder is universally recognized as either fire or police. The Plume Dose Field Monitoring Teams are emergency workers and are highly trained in taking field measurements.

- Chapter 11, page 209, paragraph 4 and 5, the report is contradictory. First it indicates sirens will not be heard inside and then it states that voice capable sirens should be considered. Voice siren messages are less audible than the siren tone.

- Chapter 11, page 209, second paragraph, the authors indicates that the cities are not directly informed but must wait for the counties to inform them resulting in shadow evacuation or spontaneous evacuation in a plume exposure emergency planning zone, and role conflicts for emergency services personnel. According to New York State Law the county executive is the only one who can order a county evacuation. It is noted in the plans that local police and fire departments are notified and are to respond accordingly. County plans specify that the local jurisdictions are notified. In fact the largest and closest town to the Indian Point facility has a RECS terminal that is to be manned on a 24-hour basis.

- Chapter 11, section 11.1.2, pages 210-211 discusses alerting methods and states "People can be better alerted by a combination of various pathways." The plan discusses siren, tone alert radios, and the new EAS system that utilizes radio, tv, and cable. Voice-capable sirens are not considered, as the authors indicate there are mixed results on their effectiveness and in the hilly areas around Indian Point

they could be worthless. There is also the statement that individuals may travel from New York City to Westchester and Rockland Counties to work and not have access to media outlets. This statement is without substance considering the availability of radio, cell phones traffic and access control points established as part of all plans to control travel within the EPZ.

- Chapter 11, section 11.1.2, page 210, discusses the issue of communicating with the minority populations in the 4 risk counties. The new Public Information Materials are bilingual as are the EAS and follow on messages.

- Chapter 11, section 11.1.1.3, paragraph 4, page 213, indicates that the authors observers at the full-scale exercise noted "...emergency managers or decision-makers unnecessarily argued about the correct protective action during the response." The phrase "unnecessarily argued" is may be too strong a point. The need to have discussions is necessary to insure that the best possible decision is made. Decision-makers consult with their EOC staff for information, consulted their Dose Assessment staff, reviewed the Evacuation Time Estimate and discussed what they were planning with the other risk counties and the state. There were no "arguments" during this process.

- Chapter 11, page 213, concerning the evacuation of "Sing Sing" (the Ossining Correctional Facility). The State plan clearly indicates that this correctional facility will not be evacuated but will shelter in place.

- Chapter 11, page 213, last paragraph, last sentence is incorrect. The County plans all contain a provision to use the release duration in their assessment. If there is no definitive data available, a 4-hour release duration is used.

- Chapter 11, page 214, paragraph at top of page, is not accurate. The first siren sounding, at Site Area Emergency, occurred approximately 2 and ½ hours before there was any release. When General Emergency was declared and sirens again sounded, there was no release. The scenario wind speed was 12 miles per hours. The report states "Despite these caveats, the half hour to two hours probably does not provide enough time for the warning to disperse through the community and for the protective actions to be completed. " There is no system in existence that can assure that protective actions can be completed before a plume arrives. The goal of emergency preparedness is to provide dose savings (NUAREGA-0654 at 6). To suggest that the exercise report missed a critical point, as defined by the report writers but not by the published EP rules and regulations is inappropriate.

- Chapter 11, page 214, paragraph 3 states "a related protection issue that is not directly associated with evacuation is the use of potassium iodide (KI) tablets." KI does have an association with evacuation. A very real and signification concern that was not addressed by the authors is the public concept that if they take a KI tablet then they would not have to evacuate.

- Chapter 11, page 214, paragraph 4 discusses sheltering as a protective action. NUREG-0654/Rev.1/Supplement 3 clearly states that evacuation of a two-mile ring around the plant and 5 miles downwind is the preferred protective action option for the population near the plant. Basically, the risk of an evacuation is lower than the risk of remaining in shelter in these areas.

- Chapter 11, page 216, paragraphs 1 and 4 discuss the use of the trains and watercraft for evacuation purposes. The authors discuss using the river to evacuate school children. The question is who is liable if there is an accident on the river. Stopping the trains is necessary to prevent individuals, foodstuffs, or other items from entering a potential hazardous area.

- Chapter 11, Section 11.1.1.4, There are Serious Issues with the Response to Information Needs: The first sentence seems inconsistent with Chapter 7 (Review of Public Information and Education Programs) which seems generally favorable but does offer suggestions for improvements in terms of content and effectiveness.

- Chapter 11, section 11.1.17, second paragraph discusses the older evaluation methodology and refers to "grading" and indicating "...the cause-and-effect relationship of the function to the outcome cannot be established." This comment is not based on reality or actual practice of the evaluation methodology. The exercise that was observed, by individuals not familiar with REP exercises, was evaluated on a performance-based outcome. To indicate anything else is misleading.

- Chapter 11, section 11.2, chart: Training – already in place. Utilities have training programs in place and require certification of their staff. Off- site there are a number of training opportunities through Emergency Management Institute in a number of key responder areas. The authors state existing processes that State and county emergency officials are aware of.

- Chapter 11, section 11.2, chart: Exercises – this has been an on-going process since the initiation of the first FEMA evaluated exercise. Exercise evaluations are currently performance based, and lessons learned, large and small are integrated into the plans and procedures. The authors are stating existing processes.

- Chapter 11, section 11.2.1.1, page 223, paragraphs 1-3, talk about "adopting performance-based system" to evaluate effectiveness. Once again, the performance-based system is in place and was used during the 2002 exercise.

- Chapter 11, section 11.2.1.3, page 227, item 3, first paragraph, last sentence "If the protective strategy modeling indicates that stable iodine has the potential to reduce exposure, a coherent approach...." This statement is incorrect. KI does not reduce exposure. It merely protects the thyroid, not the entire person. It is critical that the public understand this difference.

- Chapter 11, section 11.2.1.3, page 227, item 3, second paragraph, last sentence states "all resources (federal included) that could be expected to be deployed should be included in exercises periodically..." This is already occurring, mainly in plume/ingestion pathway exercises.

- Chapter 11, section 11 2.1.3, item 3, paragraph 4 , page 227 pre-staging evacuation kits for students at schools. Included would be medicines. This would be very costly to a low-income family that may have a child on expensive medication. To buy a bottle and store it only to discard it once it expires is wasteful. Furthermore, school plans indicate that the evacuating school will bring all medications that are available at the school. Many students have meds at school with a doctor's statement allowing school nurses to administer them.

- Chapter 11, section 11.2.2.2, first paragraph, last sentence, page 229, discusses special facilities such as factories with a high noise level that would impede the hearing of the sirens. It should be noted that most of the counties have placed tone alert radios in large facilities.

- Chapter 11, section 11.2.4.1, page 234; entire section is a duplication of other areas and a restatement of fact. The last paragraph recommends that "...those who make protective action decisions and be involved in communicating with the public through the media....should regularly participate in scheduled exercises." The authors imply that decision-makers are not involved in exercises. This is not correct. Historically and during the recent exercise all county and state decision makers were fully involved. Although differences of opinion regarding FEMA findings often occur, New York State and its counties have always taken the exercise process seriously with the ultimate goal of insuring life and property are protected..

- Chapter 11, section 11.2.5, page 234, last paragraph states there should be a comprehensive schedule of quarterly drills and annual exercises. The authors are restating that which already exists. The plants, states and locals do have drills and annual exercises. Training is an ongoing annual process. FEMA evaluates the biennial exercise as well as being involved in scores of out of sequence drills and reviews.

- Chapter 11, section 11.2.5.2, page 235 paragraphs one and four would create new policy that would require revision to 44CFR350. Most, if not all, state and local emergency managers conduct quarterly, if not semi-annually, drills of their respective organizations for events other than radiological.

- Chapter 11, section 11.2.5.6, page 236, discusses the need for upgrading communications capability with all facilities. As new technology is developed this should be a priority to improve communications. According to section 11.2.6.2, pages 237, back up radio systems were not always available. This

statement requires a specific example. The Counties and the State had access to several back-up radio systems and the use of at least one of these systems was demonstrated during the exercise. It is a requirement that at least one backup system be available. During the exercise there was outstanding support from the volunteer radio groups.

- Chapter 11, section 11.2.7, page 237, second paragraph, regarding the statement on "...newer technologies such as tone alert radios". This has been addressed before; however, all counties do have and do use tone alert radios and it is stated so in the plans for each county.

- Chapter 11, section 11.2.7.1, pages 238-239 are partially correct. The 1970's vintage plastic overlays are a backup method for hazard assessment in the counties. The primary is a computer-based program. The utility has 16 permanently mounted real time radiation measurement devices. Their read out is transmitted near real time to the counties and state.

- Chapter 11, section 11.2.7.2, page 239, second paragraph appears to be duplicating what was discussed in section 11.2.1.et seq.

- Chapter 11, section 11.2.8, page 240, references "...the unique consequences of a terrorist attack..." A terrorist attack would be unique. However, the off site response would be the same.

- Chapter 11, section 11.2.8, page 240, second paragraph, second sentence, "Also, plans and exercises should be directly based upon the achievement of the current standard for does to the public." This sentence is unclear. The PAGs are projected doses, which warrant taking an action they are not dose limits.

- Chapter 11, section 11.2.8, page 241, fourth paragraph, discusses how the systems and practices were developed in a different environment (pre-911). However, the response to an incident will remain the same.

## 3. FEMA Comments on NY State Report, Appendix G – FEMA Exercise Report Findings

**(Please insert Appendix G table here.)**

## 4. FEMA Comments on NY State Report, Appendix I – 2002 Indian Point Practice and Full-Scale Exercise Observations

This component of the New York State report contains information based on observations made during the practice drill and the actual exercise for Indian Point Energy Center. The concept of observing a practice drill and then the actual exercise is good; however, as with other parts of this report there are factual errors.

FEMA often observes the practice drills, but not in the evaluator role. Rather the FEMA personnel are there to observe and provide guidance to the participants. During the actual exercise, FEMA personnel are in their evaluator roles and cannot do this. Therefore, it was good that the authors of this report did attend the practice drill as well as the exercise.

This section of the plan would have benefited from better organization of the section. That is, comments regarding the drill (identified as Practice) should have been followed with comments regarding the actual exercise (identified as Full Scale). Thus everyone, participants and the general public, could have discerned the difference and improvement based on practice. It is important to note that a practice exercise is just that: practice. While FEMA evaluators often observe practice drills and exercises, what transpires during a practice is never included in the final exercise report; it would be unfair to include these observations. If the intent was to show how the practice led to a successful demonstration of evaluation criteria, the table that is Appendix I falls short in that endeavor. The observations on the Practice Exercise are mixed in with the observations on the Full-Scale evaluated exercise, thus losing emphasis and creating confusion. In addition, the majority of comments, even those that are positive are written in the negative; i.e.; no command and control management issues were noted, rather than, command and control functioned well.

There are a number of errors, duplication of statements, and unsubstantiated value statements within this section that need to be addressed. Only a portion will be addressed here.

General

Full-Scale, first General comment, page I-1 indicates that the counties and the States did not communicate regarding dose assessment. This is not accurate; FEMA evaluators did observe the counties and the State discussing dose assessment. During the exercise all four counties and the state compared dose projections with good agreement. When the utility expanded its Protective Action Recommendation based on a projected dose exceeding the Protective Action Guideline at 5-miles, the decision group (4 counties and State) accepted with a minor exception the recommendation.

Full-Scale, second General comment, page I-1 indicates that dose was not factored into Protective Action Decision-Making (PAD). This statement is not in accordance with

current federal policy for the initial PAD. The current Federal position is to make Protective Action Decisions (PADs) based on plant status. The plant status has been analyzed and if conditions do not improve, then onsite serious doses (potential early health effects doses) are possible. If on the other hand things onsite go well, there may note even be a release of radioactive material and therefore no dose. The problem is that when the plants get to General Emergency it is beyond the design basis of the facility. No one can accurately predict which way the onsite situation will go. Therefore, NUREG-0654, Supp 3 has been adopted. Therefore, implement PADs based on plant status without reference to doses. After the plant status PADS, use dose projections based on effluent monitors or field monitoring data to expand the earlier PAD. This process was demonstrated in all four counties and at Albany.

Page I-45, Full Scale, indicates that two of the 4 EAS messages were released while the counties were in media briefings. The next statement indicates that the reviewer/evaluator is unclear as to current technology: "In a real situation, this would create problems since the media could not cover the live press briefing while the EAS message is being aired." The EAS message is broadcast over the EAS system with the emergency tones, etc. The media could continue their press briefings as they are in another location from the EAS equipment. A reporter or a camera crew would not be interrupted at the briefing nor would they necessarily be aware of the EAS message going out. They would be receiving the information from the briefing and then filing their reports with their radio or television stations, or their newspapers (or other print media).

New York State

Page I-13, third row, states that the other jurisdictions did not act. However, all jurisdictions were in communication and coordination with each other and all did respond.

Page I-13, fourth row, states that the State RECS data was not adequately distributed. However, the communications room provided information to everyone in a timely manner.

Page I-20, fourth row, indicates that the State Department of Health did not communicate with the county Department of Health. Communication was observed between these two groups.

Page I-20, fifth row, states that verification of information (what information is not stated) to the four counties did not occur for 40 minutes. There was no effect that would create an exercise issue. The report should be specific about what information is being discussed.

Page I-20, last row, indicates there was no explanation for the "State of Disaster Emergency." This information is contained within the plans; the county decision-makers fully understand what this entails.

Page I-21, fifth row, discusses need for documentation. The status boards and all other information was maintained and provided to all participants.

Putnam County

Full Scale, page I-15 indicates that during the practice that the radio system was jammed. This is not accurate. This occurred during the actual exercise. The radio operators were able to compensate for this and as they are extremely knowledgeable regarding radio transmissions they indicated that the sound was "keying".

Full Scale, page I-23: The comment regarding the facility is useful information but is only a value statement. The question is, is the facility adequate for emergency response? The facility did not provide any hindrances to the exercise. It is understood that a newer, more state-of-the-art facility is being planned and built.

Full Scale, page I-23: The Executive Hotline did function. However, as Orange County was having communication problems; all counties went to their backup system (not their secondary system).

Full-Scale, page I-6 and Page I-32 are in conflict. Page I-6 indicates that no one observed or announced set-up of access control and then on page I-32 the statement is made that all went well. An evaluator did observed the establishment of traffic control points. A second evaluator went to an outside location and observed and interviewed law enforcement personnel that would staff these points.

Practice: Page I-31: The term "relatively isolated" is used to describe where the decision-makers are located within the EOC. This is a misleading statement. The decision-makers are strategically located based on available space and the ability to operate in an emergency environment. Using the space available to them, Putnam County has historically demonstrated full command and control.

Full Scale, page I-41: Putnam County heard about the release from their liaison at the EOF and then the Health Department. These personnel were doing their jobs.

Full Scale, page I-42: the number in the public information brochure is to the county EOC. Additional numbers will be provided if there is an actual emergency according to the plan.

Full-Scale, page I-43 and Page I-45 are in conflict with each other. First the report acknowledges that Putnam County had the first press release at the first press briefing and then, on page I-45, it states that the first press release was up too early. "Too early" is a value judgment and there is no explanation of why it was too early or what negative effect it had. If Putnam County was going into a press briefing, they made their press release accordingly.

Orange County

Full-Scale, page I-5, indicates that there was conflict with Rockland County on home rule of emergency response and planning area 39 as to decision-making authority. There no conflict. There was a productive discussion between Orange and Rockland Counties that brought resolution to the question in a short time. There was no issue.

Full-Scale, page I-14, indicates that Orange County had problem with the Executive Hotline. This is correct. All other counties switched to their backup lines to accommodate this problem.

Full-Scale, page I-14, indicates that the County Health Official was not willing to make decisions and had to defer to the State. This statement is not accurate. Pursuant to New York State law, the County Health Official did as required.

Full-Scale, page I-22, discusses the size of the EOC. This is a value judgment. The facility is and continues to be adequate to support emergency response functions. This facility, like all county and state EOCs has been tested and has been found to be adequate.

Rockland County

Full-Scale, page I-6, indicates that there was conflict with Rockland County on home rule of emergency response and planning area 39 as to decision-making authority. There no conflict. There was a productive discussion between Orange and Rockland Counties that brought resolution to the question in a short time. There was no issue.

Full-Scale, page I-24, first row, indicates issues concerning the executive hotline. Again, the executive hotline worked well. However, Orange County was having problems, so all counties switched to their backup system.

Full-Scale, page I-24, second row, discusses the location of the SEMO representative. This is not an issue and there was not effect.

Full-Scale, page I-24, fourth row, discusses how RACES was under-utilized and the sending of picture date via cameras but no computer in the EOC could accept the data. This is not their responsibility.

Westchester County

Full Scale, page I-8, second row, states that personnel did not talk about 'hazard' arrival time when making protective action decision. Taking 'hazard' to mean 'plume', the County Executive, County Emergency Management Director, Director of County Public Health, the Dose Assessment staff discussed the plume arrival while planning protective action decisions. In addition, the county coordinated this information with the other three counties and the state.

Full Scale, page I-8, third row. states that sirens were sounded before schools were informed of the event. The School Coordinator notified the schools as required in the plans. Several schools were evacuated before the EAS message was initiated. The statement that sounding the sirens will create "increased traffic congestion around schools are the sirens are sounded..." is unfounded and speculative. The sounding of sirens does not invoke immediate reaction to drive to a school.

Full Scale, page I-9, second row, discusses that EOC personnel did not talk about traffic control points. The Sheriff did set up the traffic control points in the EOC. An evaluator did travel to another location to interview law enforcement personnel who would initially staff traffic control points. If the phrase "Command Center" means the EOC, there was a map that clearly indicated where the traffic control points were located.

Full Scale, page I-9, third paragraph, discusses the issue of shutting down the trains and thus "trap workers who rely on that mode of transportation." The author does not address the other passenger and freight trains that transverses the EPZ. In addition, all trains are stopped outside the EPZ. Any workers inside the EPZ would be evacuated by either personal vehicle or bus.

Full Scale, page I-16, third row, states there were problem with the executive hotline and mentions that Putnam County could only be reached by the backup system. The county with the communication issue was Orange County. The fact that the backup system functioned is further support to have backup communications systems.

Full Scale, page I-16, fourth row, states that Westchester County not catching dismissal of "SIP schools" to emergency response and planning area's that were evacuating until after dismissal. The statement is not clear. The acronym of 'SIP' is unclear.

Full Scale, page I-16, fourth row is inconsistent with Page I-35, fourth row. Page I-16 appears to imply that students were released to areas that were being evacuated. However, Page I-35 indicates there were no command and control issues. Therefore, all decisions were coordinated and communicated effectively.

Full Scale, page I-25, third row, states that a "school representative showed up late , county transportation back-filled the school for the first hour, which is a coordination management issue'. There is no indication by what is meant by "late" nor any indication as to when this representative was notified to report to the EOC. Furthermore, the fact that another EOC representative was able to "back fill" the position and do their own without an negative impact on the exercise is reflective of good training and teamwork.

Full Scale, page I-25, fourth row, states that the EOF could only be reached by the primary system. This would indicate that the backup system to communicate with the EOF was not demonstrated or used. This is not an exercise issue.

Full Scale, page I-25, fifth row, states that the phones were placed in the middle of the facility and the recommendation would be to move the phones around in the future. This statement is unfounded and a value judgment. There are a number of phones throughout the EOC facility. The arrangement of telephones is to expedite the needs of the various EOC representatives in accomplishing their emergency responsibilities. The arrangement of the EOC is functional and has not created any negative impact on any EOC activities.

Full Scale, page I-25, sixth row, states that the County Executive and deputy "...could have displayed a better working knowledge of basic radiological concepts." This statement is totally unfounded. Granted the County Execute and deputy have a myriad of activities their knowledge of basic radiological concepts better than most individuals in similar positions across the country. Furthermore, these individuals have a number of staff that they can and do rely on to supply information to them. Among the staff members are the Accident Assessment staff, the County Emergency Manager, the County Health Department (the Director was in attendance during the exercise) and the utility liaison located in the EOC.

## 5. FEMA Comments on Appendix J: Advocacy Issues

This appendix provides the reader with a compilation of the various concerns and issues so identified by a variety of advocacy groups. The term "Advocacy" is meant as a generalized term. One concern is the last sentence in the first paragraph, where the ambiguous statement is made that "...many who are responsible for portions of the plan(s) have also expressed reservations about some of its more salient aspects." There is no indication of what portions of the plans those who are responsible for are most concerned about.

The authors of this report provide the concerns as basic well-grounded facts rather than clarifying where there is misinformation or half-truths. For example: page J-1, last bullet indicates that the plan relies on objective data that is outdated and incorrect. The authors could have cited in their report where they indicate that this information is currently in the process of being updated. Instead the statement is left as though nothing is or has occurred.

Page J-1, second bullet discusses the issue of parents picking up their children from school rather than going to the designated center and that children in school outside the risk area will be picked up by their parents. It should be noted that FEMA is encouraging as part of Citizen Corps for parents to discuss with the schools what their plans are for evacuation.

Page J-1, third bullet is unclear. It reads that "...emergency officials can give evacuation information to the public and that the information will enable certain populations (like school children) to be evacuated earlier than other populations." Just how the information will enables this is not explained. Many communities have plans that require the early evacuation of school children before the general population.

Page J-1. fourth bullet indicates that the emergency plans fails to consider radiation release from spent fuel pools. First, just as with a terrorism incident or a leaky valve, the off-site response will be the same. Second, unlike the reactor core, there is nothing 'pushing' radiation up and out beyond the site boundary to off-site areas. Third, cooling pools are 40 feet of water encased in concrete within a concrete an steel structure. Any time of radiation release is highly speculative.

Page J-1, fifth bullet indicates the plans assume that emergency workers will return to the risk area. The implication is that they will not. However, it should be noted that emergency workers are either removing people before a release or staffing access and traffic control areas outside the release area. Any emergency workers that would enter the risk area will either be emergency medical crews with appropriate protection to save lives or highly trained field teams taking samples.

Page J-1, sixth bullet discusses the "assumption" that there will be a significant amount of time between notification of government officials to evacuate and any radiation release. First, exercises are artificial regarding times. Only in a "fast-breaker" might there be a short time period. Unless the release is being pushed by the generator, the length of time would depend on the wind speed and other variables.

Page J-1, seventh bullet discusses that "sheltering-in-place" is adequate protection. There is no discussion by the authors regarding NUREG-0654, Rev.1, Supp. 3 that clearly specifies evacuate 2 mile ring and 5 miles downwind.

Page J-2, third bullet, plans for contaminated water supply would be considered during the post plume portion of the exercise or actual event. As the 2002 exercise was plume only, the authors would have had to interview state personnel to learn what has pre identified. In addition, there would be federal involvement and resources based on both the Federal Radiological Emergency Response Plan and possibly the Federal Response Plan.

Page J-2, fourth bullet, indicates that the protection of pre-school children is inadequate. There is no discussion as to what is considered adequate. The county plans do identify the per-school and day care providers and have procedures to notify and evacuate them.

Page J-2, sixth bullet, is concerned about evacuation plans for colleges. Colleges are considered part of the general population.

Page J-2, second paragraph contains an assortment of misguided concerns based on partial information. These concerns include not planning for a "fast breaker" bu the utility, the capacity of area hospitals to treat workers and citizens, refusal to medical personnel to report, and the location of reception centers. The hospitals are not used to do initial monitoring of individuals; that is to occur at the reception centers. The hospitals will be used in the event someone requires medical attention, broken leg, heart problems, etc., and capacity should not be exceeded.

Page J-2, third paragraph, is concerned with terrorist making a "dirty bomb" from the spent fuel rods. First the terrorist would have to obtain one. The rods are kept in pools of water 40 feed deep inside a concrete structure. There is no way anyone can just walk in and take a spent fuel rod and leave. Furthermore, without proper protection the individuals would b exposing themselves to possible contamination.

As for the security issue and not fixing the hydrogen leak, those should be addressed by NRC.

Page J-3, the paragraph throws out various issues that the advocacy groups have and yet the authors do not address how within their own report they have shown many of these are non-issues. The authors mention that the advocacy groups reject the relevance of the 10-mile emergency planning zone, but do not indicate why. The inadequacies of the roadways has been stated in several locations throughout this report.

The evacuation time study has been evaluated by experts in road design and capacity. Nonetheless, the advocacy groups have the perception that the roads are inadequate. The roadways are the concern of the state and local jurisdictions, not the utility or FEMA.

The lack of effective protective action strategies is a spurious statement as shown by the dedications demonstrated during the 2002 exercises and the exercises preceding it by emergency responders. Although the report discusses both Millstone and Indian Point, the last sentence of this paragraph must be read carefully. Although the sentence is referring to Millstone, the implication is that it could be referencing Indian Point and that the area derives no benefit from the plant, only risks.

## 6. FEMA Comments on 44 CFR 350.13 Petition for Withdrawal of FEMA Approval of the Indian Point Radiological Emergency Preparedness Plan, June 17, 2002

### A. The Evacuation Travel Time Estimates for the Indian Point REPP fails to meet the requirements of NUREG-0654/FEMA-REP-1.

The Evacuation Time Estimate (ETE) study provides estimates of the time required for the evacuation of various portions of the EPZ and under various conditions. It is based on census figures and has been revised based on the 2000 census, but the results have not yet been incorporated in the plans. The petition correctly quotes several NUREG-0654 criteria and Appendix 1 from the original 1980 version of the document. What it fails to recognize is the revised Federal guidance as published in NUREG-0654 FEMA REP-1 Rev.1 Supp. 3, July 1996. The original position, as stated in Appendix 1, included the use of the ETEs in the decision process and stated under the General Emergency discussion in Appendix 1, Section 4.c, sheltering should be recommended where evacuation cannot be completed before transport of activity to that location. This original position placed significant emphasis on the ETEs as cited in NUREG-0654, Part II, J.10.m. Information and analysis not available in 1980 has lead to the position expressed in Supplement 3. For core melt or potential core melt sequences, evacuation is the recommended protective action for the population near the plant if evacuation is possible (Supp. 3 at 3). There is no dependence on the ETE in this decision. Analysis has shown that for serious accidents the dose from ground contamination may become very significant. Having people shelter only increases the dose from ground contamination. Sheltering may be the preferred protective action if evacuation is impossible or particularly hazardous, but for areas near the plant, the ETE is not determinative. If it is known that the release of radioactive material is to be of short duration, sheltering may also be the preferred protective action. Supp. 3 states that except for containment venting, short duration releases are not predictable. Early evacuation will avoid most of the release and accompanying dose for a long duration release. There is no dependence on the ETEs for any of these early decisions and while up to date ETEs are useful, their basis in the decision making process has diminished between the original publication of the NRC/FEMA guidance and the current time. The primary value of the ETE study currently is to assure that the most effective traffic management approach is included in the plans. The role of protective action decision-making is to reduce dose and based on the best available knowledge, the early evacuation, if possible, is the best means of reducing dose for those near the plant. This current Federal position was litigated as part of the Seabrook licensing hearings and was adopted by the NRC Commission is their ruling CLI-90-02. The Draft NY State report misses this current Federal position in its findings.

**B. The Indian Point REPP fails to address "shadow evacuation" as required by NRC Guidance Document "State of the Art in Evacuation Time Estimate Studies for Nuclear Power Plants," NUREG/CR-4831.**

The question of the "shadow evacuation" impact has been litigated in both the Shoreham and Seabrook licensing hearings. There can be no question that "shadow evacuation" is a real possibility. There is, however, question as to the magnitude of this type of behavior. The petition cites one of the approaches to minimize the impact of such behavior, that is, establishment of traffic and access control around the impacted area. The County plans for the Indian Point Energy Center (IPEC) have provisions for this approach. The second approach involves including the "shadow" in the demand estimates when calculating the ETEs. This approach involves establishing the magnitude of the "shadow" and this is clearly not an exact science. "Shadow Evacuation" is, however, being considered in the preparation of the updated ETE for Indian Point. It should be noted that the ETE study is an NRC requirement on the utility; the offsite planners just include the values in their plans.

**C. The ETTE relies upon outdated data that significantly underestimates the population in the Indian Point EPZ.**

The 2002 versions of the County plans contain population figures based on the 2000 census. The ETE for Indian Point, as noted above, has been revised.

**D. The ETTE fails to address family separation in its analysis of evacuation times.**

Expertise is lacking to address the specifics of the method used to develop the ETEs. FEMA has in the past come to the agreement that the NRC would be lead on these issues since the ETE is an NRC requirement that is placed on the utility.

**E. The Indian Point REPP relies upon information control and secrecy, and therefore, fails to adequately inform the public in the event of a radiological emergency.**

It is true that one of the early actions that might be taken for the school population is a precautionary transfer of the students to an appropriate host facility. It should be noted that this is not an evacuation as generally understood and it does not imply that there is a need to evacuate or shelter the general population. The action is often taken to free up resources that are needed for a general public evacuation if one becomes necessary. The State and local officials have, for a considerable time, resisted the activation of the Alert and Notification system for precautionary actions.

**F. The Indian Point REPP fails to meet the requirements for protection of foodstuffs and drinking water in the 50 mile ingestion exposure pathway EPZ.**

The current plans assign post plume protective action decisions to the State. In the State plan in Section III.2.6.2 and 2.6.3 options are presented to protect the milk produced

within the impacted area. The most common option is to provide uncontaminated food and water to the cows (put cows on stored food and water). For the vast majority of commercial dairy operations, the cows are on stored food and water as a standard operational protocol. For other agricultural products, one of the options is to embargo food pending evaluation thereby negating any concerns about delayed sample analysis. Procedure M contains sampling procedures for the ingestion pathway. Procedure H specifies assessment techniques for the ingestion pathway and has adopted Federal Guidance with respect to PAGs and their associated Derived Intervention Levels (DILs). The statement is made that the implementation of protective measures will be carried out by the Department of Agriculture and Markets in coordination with the Department of Health. Both of these agencies are represented in the State EOC. The following statement in the petition "There has been no such effort in the Indian Point REPP, which do not indicate which State agencies are to be contacted or how these contamination assessment process will work", is not supported by the simple language of the State plan.

**G. The Indian Point REPP fails to address the requirement for administering radioprotective drugs to the general population.**

The current version of the State and County plans conformed to the existing Federal policy of the use of KI for the general public when the plans were last revised. The following statements in the petition 'FEMA's suggestion that this legal deficiency with the Indian Point REPP will be addressed prospectively directly contravenes the plain meaning of the law. NUREG 0654 FEMA REP 1 was first published in 1980 and the Indian Point REPP was last approved in 2001. Thus, FEMA acknowledges that the Indian Point REPP does not now, nor has it been in compliance since Indian Point was required to have an emergency plan." fail to consider the change in the Federal position on the use of KI. NUREG-0654 criterion J.10.f references the FDA guidance of KI use and that guidance clearly indicates that the use of KI for the general public is a State decision. The State decided, at the time the last revision of the plan, not to use KI for the general public. A change in the Federal policy and a change in the New York State position on the use of KI as an additional option to sheltering and evacuation has resulted in a need to update the plans to conform to the new State position. In accordance with NRC and FEMA policy, the plan revisions are due one year from the time the KI was delivered to the State. These plan changes are due in the next plan revisions.

**H. The Indian Point REPP does not address the possibility of a radiological release from outside the reactor containment building, and therefore, fails to analyze emergency response scenarios that could trigger protective action.**

The plan is not restricted to use for releases from the "Reactor Containment Building". The petition states, "The Indian Point REPP assumes that a radiological release would come from the reactor containment building. It explicitly states that such a release "would almost certainly be contained within the reactor containment building." This is not explicitly what the plan says. The correct quote is "The nature of the uranium fuel at the Indian Point Energy Center (IPEC) precludes the possibility of a nuclear explosion (a weapon-type detonation). Other types of accidents are possible, but unlikely. These accidents, should they occur, would almost certainly be contained within the reactor

containment building", (Westchester County Plan, June 2002, p. I-12). There is no basis for assuming that the above statement in a County plan means that the operators of the IPEC plan and procedure do not include other potential release paths. FEMA notes that the NRC or the licensee is best suited to address this issue as it is an onsite issue.

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Iadequate (I) | State Rating | Draft State Report Comments |
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| A.1.a | The plan identifies the general responsibilities of local, state and Federal governments intended to be part of the overall response organization. General responsibilities are detailed in Section 1. Responsibilities for the phases of Readiness, Response and Intermediate and Late phases are contained in Section II, Section III and Section IV, respectively. | A | Met | This section discusses this information in great detail. |
| A.1.b | Each of the plan Sections, Introduction, Readiness, Response, and Intermediate and Late phase, detail the concept of operations for State Agencies, local governments, the Nuclear Facility Operator and the Federal Government that pertain to that phase of the emergency. Table 1 in Section II is a matrix of activity responsibilities for various State agencies during the readiness phase. In Section III, pg. III-3, the plan makes reference to a Table 2 which the plan states is a list of response activities assigned to State agencies, local governments, the private sector and the Federal government. **This Table could not be located in the plan. Section III also has two Tables listed as Table 3 (pg. III-30 and pg. III-44). However, neither of these contains the information described in the plan as being contained in Table 2.**<br><br>**In Sec. IV, para. 2.0, p. IV-2 - The relationship and staffing of the Recovery Committee (appointed by the DPC) and the Recovery Planning Council appointed by the Governor should be described.** | I | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| A.1.c | Section III (pp 46-47) contains two diagrams showing lines of authority State, local, Federal and NFO under two conditions: Prior to State Declaration of Disaster Emergency, During such a declaration. *An additional diagram attempts to show both authority and communication links; however, the relationships are difficult to distinguish.*<br><br>**There is no diagram showing the interrelationships for most of the State agencies.** | I | | |
| A.1.d | Section III part 1.3 pp III-1 states that local government has the primary responsibility for responding to a radiological emergency. State agencies are to support local government. Upon a State Declaration of Disaster Emergency by the Governor, the DPC assumes direction and control of emergency response. Section III (pp 46-47) shows two diagrams that illustrate the relationships before and after a Governor's declaration.<br><br>*The local risk County plans should be reviewed to assure that this change in the lines of authority is documented appropriately.* | *A* | | |
| A.1.e | Section III (p. 5) states that SEMO has communications systems for maintaining contact with EPZ counties, SEMO field offices and the NFO. SEMO staffs the SECC on a 24-hour basis. The communications/Warning procedure (Procedure B) further details the State's communications links. | A | Met | This section also references each respective county's radiological emergency preparedness program protocol. |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| A.2.a | **See comments regarding Table 2 under criterion A.1.b.** | I | | |
| A.2.b | The acts, codes and statutes giving authority to undertake the emergency response actions detailed in the plan are listed in Section I (pp10-12). | A | | |
| A.3 | Appendix E of the plan lists 4 LOA/MOU describing agreements with American Red Cross, Niagara Mohawk Power Corp., NYS Power Authority and Rochester Gas and Electric Corp. **However, the agreements themselves are not contained in the plan and were not submitted for review. Note: LOAs/MOAs will need to be updated with change of ownership of the plant(s).** | I | Not Met | The plan refers to Letters of Agreement provided in a separate appendix, as permitted by NUREG-0654. However, because the reviewer was not provided with a copy of the appendix, the content and currency of the LOAs could not be verified |
| A.4 | The plan (Section III, p. III-3) designates the Director of SEMO as having responsibility for ensuring continuity of resources. | A | Met | This capability is referred to as the Resource Continuity Organization in the plan |
| C.1.a | The plan states (pg. III-3) that the State Commissioner of Health or designee is authorized to request FRMAP assistance.<br><br>*On Page H-2, the Rad Assessment Staff at the EOC is assigned the responsibility of requesting radiological assistance from the Brookhaven Area Office of DOE; whereas page H-10, Section 6.2.2 indicates that SEMO will request all federal radiological assistance through FEMA. This contradiction/apparent contradiction should be clarified. Procedure H, para. 6.2.2, p. H-10 states* | *A* | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *that NYSEMO will request all Federal radiological assistance through FEMA, whereas in paragraph 4.2 on page H-3 it indicates that the New York State EOC radiological staff requests Federal radiological assistance through DOE's Brookhaven Area Office.* | | | |
| C.1.b | Procedure H states that the FRMAC field organization is expected to provide personnel and equipment to coordinate and perform environmental monitoring and assessment.<br><br>*Appendix A –FRMAC lines 2 & 3; The individual in charge of the FRMAC is now termed the "FRMAC Director", not the Offsite Technical Director. Appendix A, p. 4 Federal Response Center; This facility has been replaced in the Federal Response Plan with the Disaster Field Office (DFO).* | *A* | | |
| C.1.c | The resources available to support Federal response are listed in Appendix D of the plan. | A | | |
| C.2.a | Procedure H states that the State will typically send two representatives to the EOF. One will be a radiological Health Specialist and the other will be a specialist in reactor systems and operation.<br>*Section III, subsection 2.3.3 Activation: It is inappropriate to use the word "may" with respect to the pre-designated County personnel reporting to the NFO EOF.*<br><br>*P. III-24, Section III,Para 2.3.4; Doesn't the county dispatch a liaison to the EOF at the Alert rather than* | *A* | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *SAE as stated here?* | | | |
| C.3 | Procedure N names the Wadsworth Center Laboratory of Inorganic and Nuclear Chemistry in Albany as the radiological laboratory used to process environmental samples. The equipment available for analysis is detailed in Appendix G. | A | | |
| C.4 | Section III of the plan (Response) and Procedure H (Assessment/Evaluation) detail the facilities and organizations to be relied upon in an emergency. The plan names the NFO, NRC, FEMA, DOE, EPA, HHS, USDA, and various agencies of State and local government. **The plan indicates that Table 2 in Section III (which was missing from the copy of the plan sent for review) details the response activities assigned to State agencies, local governments, the private sector and the Federal government. The very general reference to the Federal Response Plan community may not be sufficient to specifically identify other Federal Departments and their agencies such as DOT (U.S. Coast Guard, Federal Aviation Administration, etc.)**<br><br>Section III, subsection 1.0 and 2.0. pp. III-2 and III-3: The reference in subsection 1.0 to "Procedure B, Attachment 11A for Federal notification contacts is difficult to find. Sec. III, subsec. 2.4.1, p. III-27: *The first paragraph of this page states that additional state and local radiation surveillance resources will supplement the NFO and Federal Field assessment teams. This appears contradictory to p. III-23 where* | I | | |

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| | *the Commissioner of Health will request Federal radiological monitoring and assessment assistance if it is needed.* | | | |
| D.3 | Section III (pg. 20) states that the State plan has adopted the four classes of emergency established by the NRC. Page 49 in Section III lists the levels of activation for State resources at each ECL classification. | A | | |
| D.4 | Procedures B (communications/warning),D (State EOC), G (Exposure Control) and H (Assessment) detail actions to be taken at each ECL by applicable State agencies. | A | | |
| E.1 | Section III item 2.3.2 describes the process for notification of response agencies. The plan specifies the items that will be included in the notification message from the NFO. Once notified, the SECC will ensure that the notification message is received by State DOH and SEMO according to the Communication/Warning Procedure B. Procedure B provides a detailed description, for each ECL, on how notification is to take place. Separate procedures are included for incidents that occur during and after business hours. There are some problems with the references made in Procedure B to attachments to the procedure. *P. B-1, Section 2.0 ,2nd Para,- The initial information transmittal form, Part 1, is Attachment 7, not Attachment 8 as stated. NOTE: The same comment relative to Attachment 7 rather than 8 also applies to: P. B-2, Section 3.1; P.* | I | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *B-2, Section 3.2; P. B-3, Sections 4.0 and 4.2; P. B-4, Sections 5.0 and 5.2; P. B-5, Section 6.2; and P. B-6. Procedure B, Att 1, p.2, I.A, Step 2 - Attachment 7 rather than 8 should be cited. (See also p.3, Step I.A, Step 6.b; p.3, Step I.B.2; p.4, Step I.C.2; p.4, step I.D.2; p.6, Step II.A.2; p.6 Step II.A.6.b; Step II.B.2; p.7, Step II. C.2; p.8, Step II. D.2; p.9, Step III.A.2; p.10, Step III.A.6.b; p.11, Step III.B.2; p.11, Step III, C.2; p.11, Step III.D.2).* **For example: 1) In several places the procedure makes reference to Attachment 6 as a list of SEMO field staff. Attachment 6 as contained in the copy of the plan reviewed is a statement about supplemental monitoring of transients at state parks; 2) reference is made in item 5.8 to Attach. 11 as a list of appropriate ingestion EPZ counties. The correct reference should be to Attach. 12. Attach. 12 is titled Ingestion EPZ Counties Warning Points, although it also includes the contiguous states and the province of Ontario that are in the ingestion EPZs of one or more nuclear plants; 3) several references are made to an Attachment 13. This attachment does not exist in this version of the plan (a more thorough discussion of problems with this procedure is contained in the comments for H.4).**<br><br>**Procedure B should be completely revised since much of it is out of date and many attachments are missing or are inaccurate. In Procedure B, Attachment 7, p.1, Part I of this form has been updated since this New York State Plan was** | | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | **submitted for review. In paragraph 4, B-3, DOH/DPS must do more that receive a telephone call and be read Part I of the Notification Form. They need to contact the NFO to obtain a current assessment of the situation and a prognosis of the event in progress, such that DOH/DPS can assist NYSEMO and the Counties in assessing the appropriate response.** | | | |
| E.2 | Section III, item 2.3.3 and Procedures B and D describe the concept of operations for alerting and mobilizing staff. In general, at an ALERT ECL, SEMO will notify pre-designated State agency personnel to report to their respective response facilities. At the SAE or higher ECL full activation of facilities will occur. **See comments regarding Procedure B under criterion E.1. It is FEMA's understanding that for Indian Point at least, the State has agreed to full activation at the ALERT ECL.**<br><br>*P. B-1, Section 2.1 - The NFO notifies the NY SECC rather than the NYWP, as indicated, since the emergency communication point was redesignated in Section 2.0 above. P. B-3, Section 3.5 - This should refer to Attachment 8 rather than Attachment 9. (See also P. B-4, Section 4.9). P. B-3, Section 4.6 - The first line discusses placing DOH staff on standby for possible EOC at the Alert. Weren't the plans to be changed to require activation at the Alert? P. B-4, Section 4.8 - Attachment 13 cited here is not in plan. (See also P. B-5, Section 5.8; and P. B-6, Section* | I | Met | These procedures are well established in the plan. |

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| | *6.8). P. B-5, Section 5.6 - Attachment 10 should be cited rather than Attachment 11. (See also P. B-6, Section 6.6). P. B-5, Section 5.8 - Attachment 12 rather than Section 11 should be cited. Procedure B, Att 1, p.4, Step I.C.6 - Attachment 10 rather than Attachment 11 should be cited. (See also p.18, Step 11.C.6; p.11 , Step III.C.7).*<br><br>*Procedure B, Att 3A, p.1 - What happened to the RECS drop at NYSDOH that was previously shown (Rev. 3/99)? Procedure B, Att 3B, p.1 - Why is NYS EOC no longer indicated as in rev. 3/99? Procedure B, Att 3C, p.1 - Why are both NYS EOC and NYS DOH removed versus Rev. 3/99?*<br>*Procedure B, Attachment 4, p.1 – How do the PSD personnel, who serve as engineering specialists, get notified?* | | | |
| E.5 | Section III item 2.1.3 describes public notification. The plan states that the capability exists to provide prompt notification to the public, followed by dissemination of information on protective action decisions within 15 minutes of such a decision. Activation and control of the public notification system is to be implemented at the local level in coordination with the State Disaster Preparedness Commission. The SEMO will verify that public notification systems are activated, including the coordinated use of the EAS. The concept of operations for the EAS is further described in Attachment 1 to Procedure C, Public Information. | I | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *P. III-36, Section III, Para 2.5.1, Sheltering, last para - Turning off air conditioners in severe heat conditions could result in acute health effects due to heat stress. The language should focus on minimizing air exchange with the outside, but not at a cost of health due to severe heat or cold.*<br><br>*P. B-5, Section 5.9 - EBS should be EAS. (See also P. B-6, Section 6.9).*<br><br>**Procedure B, Attachment 10 needs to be redone; punctuation is missing making the attachment unusable. Attachment 11 also needs to be revised. Attachment 10, p.2 – the message at the bottom of page 2 is missing necessary punctuation/parentheses to make it read correctly. Same comment applies to the Messages on page 5.** | | | |
| E.6 | See comments under criterion E.5. | I | | |
| E.7 | Attachment 1 to Procedure C contains the concept of operations and generic procedures for EAS message preparation. This begins when County and State officials advise their PIOs on a mutually agreed course of action (protective action decision). The PIOs will develop the appropriate message and transmit it to the activating PIO (lead County). Timing of siren activation is coordinated and the sirens are to sound prior to airing of the EAS message. | I | Met | This section also refers to the site Joint News Center (JNC) procedures. |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | **The specific procedures used by the State PIOs for their role in this process were not submitted for review.** | | | |
| F.1.a | Section III, p. III-5 and Procedure B indicate that the SECC is the warning point for notification from the NFO. This facility is staffed 24-hours per day. The primary communications system is dedicated telephone (RECS system). Back-ups systems include commercial telephone and radio systems. Procedure B -Communications/Warning describes the process to be followed in notifying response agencies and mobilizing staff for each ECL level.<br><br>*P. B-1 Section 2.0 1st Para - Attachment 6 is NOT a notification list as indicated. Attachment 6 is a procedure for supplemental monitoring for park transients. (See also p. 8-3, first line –this should refer to Attachment 5 rather than 6) p. B-3, Section 4.4* | *A* | Met | This section also refers to the Nuclear Facility Operator (NFO) Site Emergency Plan. |
| F.1.b | Procedure B instructs the SECC Operator to notify Federal Agencies and contiguous states of an ALERT (item 4.7), SAE (item 5.7) and GE (6.7) ECL.<br><br>*P. B-4, Section 4.7 - To notify contiguous states as well as federal agencies, Attachment 10 should be listed along with Attachment 11. (See also P. B-5, Section 5.7; and P. B-6, Section 6.7)* | *A* | | |

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| F.1.c | See comments for F.1.b. Attachment 11 to Procedure B lists the telephone numbers of the various Federal agencies that may be called upon for radiological emergency information or support. **Procedure B, Attachment 11, Specialized Contact List: Some of the numbers are outdated. The new numbers for EPA are for Region II: 212-637-4013 and (24-hour) 732-548-8700. National Response Center: 800-424-8802. NRC Operations Center: 301-816-5100 with 301-951-0550 as the back-up number. The DOE- Brookhaven Area Office number should be 631-344-2200. The other numbers should also be verified. In section III, C, P. III-48, the lines of communication between New York State and the Nuclear Regulatory Commission are not in accordance with reality. Lines of communication between NRC and NYSEMO, and between NRC and NYDOH are missing.**<br><br>*For state level purposes, consider a single entry for paragraph F, page 1 of Attachment 11 to Procedure B as below:*<br><br>*"F United States Department of Transportation Regional Emergency Transportation Rep (24 hr emerg) 617-223-8555* | I | | |
| F.1.d | Procedure H (p. H-3) indicates that the Radiological Assessment Team, located in the State EOC is to establish contact with the NFO to obtain updated | *A* | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | information periodically. This procedure also indicates (subsection 4.5.1, item 1) that data collected by field monitoring teams will be transmitted to their respective EOC. *A mechanism needs to be included for obtaining additional information upon receipt of the initial Part 1 of the report.* | | | |
| F.1.e | Section III, subsection 2.3.3 (p. 23) states that at the ALERT or higher ECL, SEMO will notify pre-designated State agency personnel to report to the State EOC. Procedure B, (Communications and Warning) describes the process alerting and activating personnel who will report to the State EOC, the EOF, or to the field. *Part 4.0 Response Action - Alert (p. B-3) of this procedure contains an apparent inconsistency. The last sentence in the first paragraph states that "DOH will send representatives to the State EOC". However, item 4.6 on the same page says in part: " The SECC operator will notify the State DOH staff to be placed on standby ...or to report to the EOC....". This statement should be clarified to indicate if some DOH personnel will be directed to the EOC, while others are placed on standby. Also see comments regarding Procedure B under criterion E.1.* | *A* | | |
| F.2 | Page III-6 of the plan states that the Department of Health Emergency Medical Services Program can establish contact with local EMS personnel through mobile radio units. | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| F.3 | Attachment 2 to Procedure B contains the procedure for testing the RECS system. The procedure indicates that the system is tested weekly, and that unannounced tests will be conducted as necessary. | A | | |
| G.1 | Section II subsection 3.5.1 of the plan indicates that the SEMO will assist local governments in the design and implementation of their public education programs. At the State level, Procedure C (Public Information) indicates that the State PIO shall develop and implement programs to raise public consciousness of radiological emergency preparedness. Activities may include briefings for reporters, development and dissemination of brochures and news releases, participation in town meetings and other activities. Information of this type is to be disseminated at least annually. Procedure E (Public Education) states that the SEMO will direct a statewide public education task force to assist in the development of statewide radiological emergency preparedness public education materials and to implement other program goals. Brochures have been developed cooperatively by state and county governments and by the NFOs for dissemination to the public living in the 10-mile EPZs of commercial nuclear power plants in the State. Procedure C, Attachment 5 lists the items to be included in this brochure. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. |
| G.2 | See Comments under G.1 | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Iadequate (I) | State Rating | Draft State Report Comments |
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| | | | | this issue. |
| G.3.a | Procedure C, section 3.1 states that each nuclear power plant site has a near-site News Center. Attachment 2 to the procedure lists the locations of these news centers and provides general procedures for operation of the Joint News Center. | A | Met | The State plan contains sufficient detail to meet the requirement. This section. also refers to the Joint News Center (JNC) procedures. |
| G.4.a | Section III, subsection 2.1.7 indicates that the State PIO has been designated as the single source of information on State response activities and recommended public protective measures. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. *(This comment was provided for G.4a-G.4c)* |
| G.4.b | The Public Information Procedure C states that the State PIO shall coordinate information release with County and utility PIOs. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. *(This comment was provided for G.4a-G.4c)* |
| G.4.c | Procedure C states that the State PIO, in conjunction with county and utility PIOs, will maintain a rumor control system. This system is to include media monitoring and response to misinformation or rumors circulating through the public. Attachment 4 to Procedure C contains generic procedures for rumor control center operations. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. *(This comment was provided for G.4a-G.4c)* |
| G.5 | Attachment 5 to Procedure C (Public Information) states that a joint media briefing shall be conducted annually at the applicable JNC for each power plant site. The topics included in this briefing include information about nuclear power, information to enhance media understanding of emergency plans and the operation of the JNC. | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| H.3 | Section III, subsection 2.2.1 of the plan states that the State EOC is located on the State Campus in Albany. The State will direct and control emergency operations from this location. Procedure D (State EOC) provides instruction to the pre-assigned staff concerning their activation to the EOC and initial actions to be taken upon arrival. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. |
| H.4 | Procedure B (Communications/Warning) lists the procedure to be followed by the SECC Operator to activate staff for the State EOC. Due to problems noted below, it cannot be certain that this procedure as presented can be used to activate and staff the EOC in a timely manner. **In several places in the procedure (e.g., item 3.2, 3.4, 5.5...) the SECC Operator is directed to use Attachment 5 to Procedure B to notify specifically-titled individuals in the SEMO organization, such as the Director or designated alternate and the SEMO Chief of Operations. Attachment 5, titled New York State Emergency Management Office, lists four individuals, all without title.** In several places in the procedure (e.g. item 5.4, 6.4) the SECC Operator is directed to notify the Supervisor, SEMO Assistant Deputy Director for Operations Communications and Warning, who will in turn notify the SEMO Supervisor of Warning and Staff, using Attachment 10. *This Attachment, titled State Notification and Activation List, does not name any of the individuals specified above.* Attachment 9, titled SEMO Communications and Warning Section, appears to be the intended reference. However, the | I | | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. |

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| | titles are slightly different. For example, this Attachment lists a Director of Communications and Warning, but not a Supervisor of Communications and Warning as specified in the procedure. *In items 5.9 and 6.9 of the procedure, the SECC Operator is directed to advise the appropriate EPZ Counties to activate their public notification system, using Attachment 12. Attachment 12 is titled Ingestion EPZ Counties Warning Points. Although it also includes the EPZ counties, it is not readily discernable from the list which counties these are. The Attachment also includes contiguous states and the Province of Ontario. Therefore, it is inappropriately titled. In items 5.6 and 6.6 of the procedure, the SECC Operator is directed to notify State Agency Staff to activate and staff the State EOC. This Attachment contains only Federal contacts. Attachment 10, titled State Notification and Activation List, indicates which agencies are to be placed on standby or activated to the EOC for each ECL level. Presumably, this list would be used to contact agency representatives who would then contact further agency staff. It is also presumed that actual contact numbers are controlled, and not contained in the list for general distribution. However, it is not clear that this list would contain names of agency contacts and their telephone numbers (i.e. there is no space indicated for this information). Also, on page 1 of this Attachment, the acronym WPO is used without definition. It does not appear on the list of acronyms in Appendix B of the plan. There are several other inconsistencies and incorrect* | | | |

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| | *references to Attachments, as well as a missing Attachment 13 referenced in item 5.8. The procedure needs to be thoroughly reviewed and revised before it can be used as intended.* **Procedure B needs to include the new plan change to notify the municipalities at the Alert ECL and for the State and counties to fully activate at the Alert. Also, see comments regarding Procedure B under criterion E.1.** | | | |
| H.7 | Appendix G to the plan lists the radiological monitoring equipment available to the State of New York. The Bureau of Radiation Control maintains emergency kits for the Syracuse, Buffalo, White Plains and Albany Regions. The kits contain a PRM-6 Pulse Rate Meter and five probes to be used with this instrument. The plan notes that there is also an emergency kit for the Rochester Region, but that it is incomplete in that it has the PRM-6 but only two of the five probes available in the other kits. The plan lists a variety of additional instrumentation (apparently included with all kits). The Appendix also lists radiological instrumentation equipment used for ingestion pathway monitoring that is stored and maintained by the SEMO. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. |
| H.10 | Procedure G, Attachment 5 describes the process for maintaining personnel dosimetry equipment. A criterion for determining that a dosimeter is defective is included. Dosimeters found to be defective are to be returned to SEMO for repair or replacement. Dosimeters are to be checked for drift annually and | A | | |

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| | re-zeroed quarterly. Appendix G to the plan states that equipment held by the Department of Health is inspected, inventoried and operationally checked at least once each quarter, or after use by DOH personnel. The Appendix states that equipment is maintained and calibrated according to manufacturer's specifications. | | | |
| H.11 | Appendix G to the plan lists the protective equipment (dosimetry) on p. 13; radiological monitoring equipment on pp. 8, 9, 13, 14; and laboratory equipment for radiological analysis of field samples pp. 4-5. **Although a general discussion of communications systems is contained on p. III-5and III-6 of the plan, no comprehensive list of communications equipment could be located in the plan or procedures.** | I | | |
| H.12 | Procedure H to the plan states that data collected by NFO and County field monitoring teams (these organizations have primary responsibility for radiation measurements during the plume phase) will be transmitted to their respective EOCs or TSC per these organizations' procedures prior to activation of the EOF. After the EOF is activated, data collected by NFO teams is sent to the EOF and county team data to their respective EOCs. Procedure K, radiological ingestion exposure, states that the State Department of Health will collect samples of water, soil and vegetation; the Department of Agriculture and Markets will collect milk samples. The Department of Environmental Conservation will | A | | |

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| | collect samples of flora and fauna. The division of State Police and the Department of Transportation will provide resources for transporting samples collected to the appropriate laboratory for analysis. | | | |
| I.7 | Section III, page III-27 the state plan states that "Additional radiation surveillance resources of the State and local agencies will supplement the NRFO and Federal field assessment teams and will be made available for assistance in determining and verifying off-site consequences". Procedure M addresses ingestion sampling team procedures, and Procedure N addresses nuclear emergency laboratory procedures. *The plan should indicate that the initial resources would be provided by the risk Counties and the NFO. State and Federal resources will supplement the initial response.* | *A* | | |
| I.8 | Primary responsibility for this activity is assigned to the local risk Counties. Appendix G, on pages 4 and 5, 9 and 10, and 13 and 14, provides summaries of radiological instruments for field use by State supplemental monitors. | A | Met | The State Plan assigns this requirement to the respective county radiological emergency preparedness program. |
| I.9 | The New York State Plan in Appendix H page 7 with respect to I.9 states "This criteria is assigned to the respective risk County REPP". *The state plan does address air sampling in Procedure M, where it is included in ingestion sampling team procedures. While some air sampling may be appropriate to be conducted by ingestion sampling teams (that is, for the case of resuspended materials), these teams would generally be dispatched to conduct sampling* | *A* | | The State Plan assigns this requirement to the respective county radiological emergency preparedness program. |

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| | *only after the initial plume has dissipated. An air sampling procedure should therefore also be made available separately to any State teams dispatched during the plume phase of the event. On page M-3 of Procedure M, the equipment listing refers to only a single filter and charcoal canister and associated materials – this should be corrected to provide for multiple filters and multiple absorptive cartridges for radioiodines, so as to permit the field team to obtain multiple air samples beyond a background air sample. Also, silver zeolite cartridges would be preferable to charcoal cartridges (silver zeolite cartridges cost more but they are not as sensitive to xenon and radon as charcoal cartridges, and that would be an important consideration in order to avoid overestimating the amount of radioiodines present in a gaseous release). Charcoal canisters are also referred to on page M-1 of Procedure M. In addition, Procedure N (Nuclear Emergency Procedures) also refers to use of charcoal cartridges (e.g. in Section 7.8, page 25); the above comments apply here also. Procedure M refers to the use of chain-of-custody forms for air samples; it is suggested that a copy of this form be included in the procedure. Also, the NY State Plan Appendix H on page 7 in reference to I.9 refers to "Capability to Detect Airborne Radioiodine Concentration as Low as 5XE-08 uCi/cc". It may be noted that this is a factor of 2 more sensitive than required by NUREG-0654 and that is fine, but is this lower threshold intentional and has it been shown to be valid for the instrumentation to be used and is it incorporated into* | | | |

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| | *air sampling procedures not available for review.* | | | |
| I.10 | Appendix H of the State Plan indicates that this is addressed in Procedure H, Attachment 1. This attachment should be thoroughly reviewed and corrected as needed.<br><br>No quality assurance appears to have been conducted on Procedure H, as it should have been. Below are some notes on observed errors.<br><br>On page H-3, Procedure H states, "When activated, the EOF becomes the center where data from the NFO, Federal and State agencies is coordinated and accident assessment is carried out". Accident assessment is carried out at the SEOC and in risk County EOCs in addition the accident assessment performed by the NFO in the EOF. Procedure H should be modified to bring it into line with current practice, clearly indicating where accident assessment is actually to occur.<br><br>*On page H-18 there are several typos, including what appear to be inadvertent replacements of "'" (apostrophes) by "?"(box).*<br><br>*Procedure H Attachment 1 on Page 1 states that "State dose assessment will utilize the applicable utility dose assessment methodology (computerized and manual; see Attachment 7. Verification of dose projections will be derived utilizing NRC and EPA methodologies." During the Indian Point 3 exercise* | I | | |

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| | *in November 2000, the NRC code RASCAL was the primary code used by state dose assessment at the SEOC; it is suggested that the procedures be modified to conform to practice or vice-versa.*<br><br>**Procedure H Attachment 1 on page 1 has an error in the expression for the cloud travel time, which would be given correctly by (x/u)/3600.**<br><br>*Procedure H Attachment 1 on page 2 there is a need to clean up both nomenclature and printing errors. The second equation, which is for committed effective dose equivalent, corresponds to the total 50 year dose and it would be preferable to the symbol on the left hand side of the equation to be subscripted with,50 in order to distinguish it symbolically from the effective dose equivalent.*<br><br>*Procedure H Attachment 1 on page 5 in Section 1.4.1 there is a typo, a colon has been left in the equation and a μ has been inserted since the previous version of the plan. There is some doubt if a 1 μCi release will result in any dose at 1 mile.*<br><br>*Procedure H Attachment 1, page 6: In the last sentence, the unit is garbled (it should be microcuries per square meter). On page 7, change "overall" to "over all".*<br><br>*In Procedure H, Attachment 1, page 12 (section 3.1.1), item c should be "annual ingestion rate" or "amount of food ingested per year".* **Furthermore,** | | | |

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| | **the second unit in item c is dimensionally incorrect; instead, the unit liters/year would be appropriate for ingestion of liquid beverages (this same error occurs on page 13).**<br><br>**In Procedure H, Attachment 2, page 1, two units require correction as a colon appears instead of a multiplicative prefix (the units should be microcuries per kilogram and rem per microcurie respectively). A similar error appears in the DIL unit in the table in Attachment 2, page 2: it should be microcuries per kilogram.**<br><br>*In Procedure H, Attachment 6, page 1 in the "Contact List for Initiating Sampling Procedures," both the "Title" and "Telephone Number" columns are blank. It is suggested that at least the title of the responsible individual be included, and preferably, the business telephone number and name of the individual.*<br><br>*In Procedure H, Attachment 7, page 1, some extraneous letters appear in the table under "Ginna".*<br><br>*Procedure H, Attachment 1. The source tables that should be used in a given formula should be referenced.*<br><br>*The copy of Reg. Guide 8.1.3 that is listed as an attachment to Procedure G has been revised (in 1999) to Version 3. Please update the reference.* | | | |

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| | Appendix A, p. 7, "Radioiodines" should include iodide 132 as well (as both a fission and a decay product).<br><br>**Procedure H, page H-3, 9th diamond, identifies one of the most important assessment functions performed by the State Department of Health, which is to calculate the ratio of the total effective dose equivalent (TEDE) to the dosimeter reading and provide the multiplication factor to State and local staff as appropriate. The State REP Plan does not contain the calculation method to implement this function. (See Criterion K.3.b.)**<br><br>*P. 8, Appendix A, TEDE - TEDE is the sum of EDE and CEDE; not EDE and CDE.*<br><br>*Procedure H, Att 1, p. 9, Section 2.2.2 - The assumption is made that the ratio of total iodine to 1-131 is 4.4. This ratio may be representative of the radioiodines in the core, but is not necessarily representative of the radioiodines in a release. The ratio will change depending on core conditions and the release mechanism. The shorter-lived nuclides will decay in the process of migration through the fuel matrix, level, cooling system, other removal mechanisms and finally release. This changes the ratio. (See also Section 2.3.2).* | | | |
| I.11 | Appendix H of the plan indicates that arrangements to locate and track the airborne radioactive plume | I | | |

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| | using either or both Federal and State resources are addressed in Procedure H. **Procedure H addresses assessment-evaluation, and there appears to be no discussion of arrangements by the State to actually locate and track the airborne plume; only actions by NFO and county field monitoring teams are discussed (e.g., on page H-4). However, Procedure H does indicate that the State EOC will request Federal radiological assistance. See also comments on Procedure H under criterion I.10.** | | | |
| J.2 | The provision of evacuation routes for onsite personnel is the responsibility of the NFO and risk counties. With respect to provisions for evacuation routes and transportation for onsite individuals, the New York State Plan in Appendix H page 7 states, "Refer to NFO and County Emergency Plan". It also references Sect. III, page 11, which provides brief information about evacuation in general, indicating assistance available from state agencies, such as SEMO, the Division of State Police, and the Department of Transportation. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the Nuclear Facility Operator (NFO) and County emergency plan on this issue. |
| J.9 | The plan states (Section III, 2.4.2) that protective response options recommended for implementation are determined on the basis of PAGs, and applicable environmental, logistical and meteorological conditions. In the plume exposure phase, the plan adopts PAGs developed by the U.S. EPA for determining appropriate response (sheltering or evacuation). For the Ingestion Exposure Pathway | I | | |

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| | phase, the plan adopts PAGs developed by the U.S. FDA. Protective response options include the isolation of agricultural products determined to exceed the established PAGs. For estimating the risk associated with deposited radioactive materials, the plan adopts PAGs developed by the U.S. EPA. Response options may include the relocation of the public in affected areas to areas of lesser radiological exposure and other dose reduction techniques. The process for making protective action recommendations using these PAGs is contained in Procedure H.<br><br>Section III, Decision Process, p. III-33: Clarify if Procedure H is the one in Appendix I. Also, is there a particular part of Procedure H that addresses the "Decision Process system?" Procedure H is 25 pages with almost an equal number of pages for the Attachments 1-7.<br><br>Section III, Sheltering, p. III-35: Do you intend to "minimize" or "reduce" radioactive exposure to particular groups?<br><br>Procedure H, Attachment 3, PAGs for the Early Phase:<br>Under the column, "Comments" add a closing parenthesis after "sheltering".<br><br>**The New York Plan has adopted the new August 1998 FDA PAG guidance in the assessment portion or the plan (Procedures H & K), but there** | | | |

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| | **has been a failure to completely revise the plan to reflect the new FDA PAG guidance in the response portion section of the plan. Section III of the plan still refers to two levels of PAGs, preventive and emergency and uses the old preventive and emergency PAG dose limits. The following locations were noted: Page III-38, Section III. 2.6.2, The Milk Pathway, 1st ; Page III-39, Section III. 2.6.3, Other Agricultural Products, 2nd; Page III-40, Section III. 2.6.3, Other Agricultural Products, 3rd; Page III-40, Section III.2.6.4, Water Sources, 1st and last; Page III-41, Section III. 2.6.4, Water Sources, 1st. Procedure K, Page K-3, bottom of page, last two diamonds, These statements refer to preventive and emergency protective actions. Do these protective actions apply to the old PAGs or the new PAGs? Also, the last word on the page is "disposition", in the context that it is used, the meaning is unclear. More explanation is necessary. Procedure L, Page L-3, Section 3.5.1 makes reference to "preventative or emergency response levels". With the new PAGs, the appropriate terminology is now "derived intervention levels".**<br><br>*P. I-5, Section I, Para. 3.3 - PAGs are levels of dose saved by taking the a protective action versus not taking the protective action. If the one rem cannot be saved by taking the action, the PAG would indicate that the action may not be prudent. P. III-29, Section III, end of Para 2.4.2 - Protective actions are* | | | |

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| | *justified when the projected dose savings due to taking the protective action versus not taking the action equal or exceed the PAG level of dose. Protective actions need be based on dose savings, not merely on dose projections.*<br><br>*P. III-38, Section III, Para 2.6, Top of page - The ingestion pathway sentence refers to the 1982 FDA PAGs rather than the "new" FDA PAGs discussed in Para 2.4.2.*<br><br>*Procedure H, p.H-20, Section 8.2.1 - At a Site Area Emergency, consideration should be given to place milk animals on stored feed and water at least out to 5 miles, if not to 10 miles. In the event of a GE, there should be no conflict in instructions to the public as to whether to evacuate or the care of the animals. The animals should be either have been taken care of before the GE, or if not, clearly a secondary consideration to people and their protective actions. (See also p. H-23, Section 9.3, item 4 and p. H-24, Section 9.4, item 4.)* | | | |
| J.10.a | The New York State Plan in Appendix H page 8 with respect to J.10.a only states "Refer to each respective County REPP", and provides no references to the State Plan. *Cross Reference should indicate respective County Plans.* | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers heavily to the county radiological emergency preparedness program plans on this issue. (*This comment was provided for J.10.a-J.10.c)* |
| J.10.b | The New York State Plan in Appendix H page 8 with respect to J.10.b only states "Refer to each respective | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers heavily to the |

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| | County REPP", and provides no references to the State Plan. *Cross Reference should indicate respective County plans.* | | | county radiological emergency preparedness program plans on this issue. (*This comment was provided for J.10.a-J.10.c)* |
| J.10.c | The primary means of notifying the EPZ population of a nuclear power plant emergency is the EAS system. Procedures for activating the system are contained in Procedure C- Public Information. The activation and control of the EAS system is implemented at the local level in coordination with the State Disaster Preparedness Commission. The lead county will access EAS in accordance with locally developed plans. | A | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers heavily to the county radiological emergency preparedness program plans on this issue. (*This comment was provided for J.10.a-J.10.c)* |
| J.10.d | Appendix H of the State Plan indicates that means for protecting persons whose mobility may be impaired due to institutional or other confinement are addressed in Section III page 34 and in Procedure E page 2. *Neither of these directed references to the State plan and procedures significantly addresses this topic. It is suggested that the state plan deal with this topic in more detail, at the very least in regard to State facilities that may be impacted, such as state prisons (e.g., Ossining Correctional Facility), state hospitals, or other state facilities (e.g., Camp Smith).* Appendix H also directs the user to refer to each respective County REPP. | *A* | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.e | **The "New York State Special Facility Potassium Iodide Inventory" (Attachment 7 to Procedure G) lists 4 facilities and agencies but does not provide any explicit numerical inventory information as** | I | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |

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| | **to the amount of KI stored at these facilities; - this should be modified so as to present explicit figures as the amount of KI stored at each special facility.** *In addition, information should be provided with respect to quantities, storage, and means of distribution of KI for state emergency workers. It is suggested that the statement regarding authorized use of KI by Emergency Workers in Procedure G, section 6.5, page G-10 be modified for clarity by inserting the phrase "per day" so that it will read, "When authorized by Commissioner NYS Department of Health, Emergency Workers are authorized to take one KI tablet per day for 10 days to reduce effects of radioactive iodine".* | | | |
| J.10.f | Attachment 3 to Procedure H-Assessment/Evaluation- states that administration of stable iodine to emergency workers will be made upon approval of state medical officials when committed dose to the thyroid is projected to be 25 Rem. The procedure for calculating thyroid dose is contained in Attachment 1 to Procedure H. The plan states that the State does not recommend KI administration to the general public. *Appendix H indicates on page 8 that J.10.f is addressed on pages 8 and 9 of Procedure G; that is not the case, and this minor error in the plan should be corrected.* Appendix G, section 6.5, page G-10 indicates that, when authorized by the Commissioner of the New York State Department of Health, the emergency worker is to take one KI tablet for 10 days to reduce the effects of radioactive iodine (see comment on | *A* | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |

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| | J.10.e). *It would be helpful for the State plan to include more information addressing the routing of this authorization within the chain of command between the State Health Commissioner and the individual emergency worker.* | | | |
| J.10.g | Section III, subsection 2.1.8 of the plan states that relocation (evacuation) procedures are covered in each County Radiological Emergency Preparedness Plan. Evacuation plans are activated at the local level per these County plans. In the same section, the plan specifies the assistance to local governments provided by the following agencies: SEMO, The Division of State Police, Department of Transportation, The Division of Military and Naval Affairs, The Department of Social Services, and the Department of Corrections. **The procedures that would be used by these agencies to implement responsibilities assigned to them in this section are not included in the plan.** | I | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.h | Section III, subsection 2.1.9 of the plan states that local agencies and the American Red Cross share primary responsibility for the registration and monitoring of evacuees at Reception Centers and for the feeding and housing them at Congregate Care Facilities. In the same section, the plan specifies the assistance to local governments provided by the following agencies: SEMO (coordinate State assistance for monitoring of evacuating personnel, if requested by local government); Department of Social Services (if requested, assist in the registration | A | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |

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| | of evacuees and coordinate activities of the Red Cross and other recognized organizations). | | | |
| J.10.i | According to the plan, the details of projected traffic capacities of evacuation routes under emergency conditions are contained in the analyses of evacuation time estimates for each respective site. These were not submitted as part of this review. *Cross Reference should show reference to respective EVACUATION TRAVEL TIME ESTIMATES.* | *A* | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.j | The plan states in Section III, subsection 2.1.12 that public security measures will be implemented at the local level and be supplemented by the State. The Division of State Police is the lead agency for this assistance. Duties assigned to this agency include establishing ingress and egress control, maintaining traffic and crowd control, coordination of support activities with Federal, other State and local government efforts, and other specified duties. | A | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.k | The plan states in Section III, subsection 2.1.8 that the Department of Transportation will assist local authorities in keeping evacuation routes clear. | A | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.l | Information on evacuation time estimates are contained in separate documents for each site and were not part of this review. *Cross Reference should indicate respective County plans.* | *A* | Met | The State plan refers to the county radiological emergency preparedness program plans and respective site evacuation travel time estimates. (*This comment was provided for J.10.d-J.10.l)* |
| J.10.m | The plan states in Section III, subsection 2.1.5 that the Department of Health (DOH) has been assigned | I | | |

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| | lead responsibility for the evaluation of data and provision of guidance to local and State authorities as to appropriate protective actions. The plan states that the recommended protective actions for the plume phase will be based on the protective action guides developed by the U.S. Environmental Protection Agency, time required to implement a given protective action, current status of road and meteorological conditions and site prognosis. Further details on the basis for choice of a given protective action are contained in Procedure H-Assessment/Evaluation-, Section 8 and Attachment 1. **Appendix H of the state plan also directs the user to Procedure J, but no Procedure J was present in the copy of the plan provided for review. (In Appendix I, the index to the Procedures, Procedure J is identified as "Radiological Ingestion Exposure," but the "Radiological Ingestion Exposure" procedure is in fact labeled Procedure K, and no Procedure J is present.)** | | | |
| J.11 | The New York State Plan notes in Section III page 31 concerning ingestion exposure pathway PAGs that "These current recommendations replace the Preventive and Emergency PAGs with one set of PAGs for the ingestion pathway," **the body of the plan has not been updated, and continues to refer to Preventative PAGs (e.g. on Page III-38) and Emergency PAGs (e.g. on Page III-39.). The plan should be fully updated throughout.** The use of the most recent (1998) FDA PAGs is addressed in | I | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | Procedure H (e.g. in Section 7.1.2, page H-18) and also in Procedures K (in Attachment 3, Table 2) and Procedure N (e.g. in Section 9.5, page 33). **The DILs shown in Procedure N, page 33 are in error by a factor of a million.**<br><br>Procedure M (Ingestion Sampling Team Procedures) requires chain of custody forms for samples; *it is suggested that copies of such forms be included in the Procedure.*<br><br>**Several of the individual procedures in Procedure M specify obtaining a sample of a particular weight (e.g. 5 lbs., p. M-14); however, no equipment for weighing samples is specified in any of the equipment lists in Procedure M.**<br><br>*Procedure M page M-1 indicates survey instruments provided are a microR meter and a GM meter with pancake probe; but the procedure on page M-10 calls for open and closed window readings suggestive of the use of a GM survey meter with cylindrical 'stick' or 'hot dog' probe with rotating shield.* **Procedure M refers to obtaining 'area dose rate' in various types of sampling, but appears to be somewhat inconsistent as to what measurements are meant by this: for air sampling: "(none)"; for soil sampling "determine both 1 meter and ground dose rates"; for surface water "dose rate in sampling area (ground)"; for snow "dose measurements at 1 meter and 2 cm.", as well as "area dose rate @ 1 m. and Open** | | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | **Window (OW)/Closed Window (CW)"; for milk "Area dose rate @1 – meter"; for produce "dose rate in area sampled"; for vegetation, "area dose rate @ 1 meter". What specific measurement(s) would be desirable for 'area dose rate' information should be reexamined and presented more specifically and uniformly; in general, a gamma exposure rate measurement at a height of 1 meter above ground level would probably be suitable.**<br><br>*The plan does not appear to include any information in regard to how decisions would be made as to disposition of what might be a large number of ingestion pathway samples of different types (and tracking to which laboratories samples are sent); it would be desirable to have at least an outline of a systematic approach to this topic included in the plan or procedures.*<br><br>The description of laboratory operations at the Laboratory of Inorganic and Nuclear Chemistry at the Wadsworth Center of the New York State Department of Health as given in Procedure N gives the impression that some emergency operations would be rather ad hoc (e.g. the use of the lunchroom or stockroom for accession (recording in the order of acquisition) and sorting of incoming nuclear emergency samples); *it is suggested that these aspects of the configuration and operations of this laboratory be evaluated in a future radiological emergency preparedness exercise if this has not been* | | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *done recently.*<br><br>**The notification procedure in Procedure N Section 2.1 indicates that all staff members are to be notified by telephone per the notification lists in Section 2.3 and 2.4; however, while Sections 2.3 and 2.4 state some notification responsibilities, they do not include formal lists; it is suggested that such explicit notification lists with names, telephone numbers, and pagers be included in Procedure N. (Although there is a notification record form (NEP-1), it only lists names and "called by" initials and does not include telephone numbers of those to be called.)**<br><br>Laboratory screening procedure for incoming samples in Procedure N, Section 5.9, page 17 states: "Place a white computer label reading "2X BKG" on any sample with a survey meter reading greater than twice background." *It is suggested that the labeling be changed to read ">2X BKG" so as not to lead to unnecessary confusion (e.g. for a sample showing a reading of say 200 microR per hour).*<br><br>Laboratory procedures in Procedure N Section 7 state several times (e.g., in Section 7.9.1) "Record the total quantity collected to the right of the "quantity analyzed" on the Data Sheet"; however, *there is insufficient space available at the specified location on the forms; accordingly it is suggested that the Data Sheet forms be redesigned to accommodate information that needs to be recorded.* | | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *Similarly, there is no specified location for recording geometry as instructed in Section 7.8.3.*<br><br>*Counting procedures outlined in Procedure N Section 8 need clarification. E.g., in Section 8.1 it states, "All samples will initially be counted for 20 minutes"; whereas in Section 8.2.3 it states "Count all samples for 15 minutes, unless instructed otherwise". Also, in Section 8.2.2, the procedures state "Count samples as soon as possible in the order of receipt in the counting room, unless instructed otherwise" and " Pay particular attention to "P" labels for priority samples" but does not indicate what substantive prioritization should occur.*<br><br>Procedure N, "NEP Emergency Supply Audit," page 42 is set up as a checklist (available, "yes" or "no"); *it is suggested that this would be more useful if modified to be a inventory with quantity of items (e.g. number of 1.4 liter Marinelli containers available) entered.*<br><br>*Some description of the laboratory facilities (with floor plans); equipment; data analysis procedures; and methodology for emergency sample data storage would be helpful.*<br><br>*The plan should indicate what TRACES would be used for now that DILS is the primary system being used. Sheltering animals to ten miles at the General Emergency would conflict with caring for people (Procedure 8, Section 8.2.1).* | | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *In Procedure N, laboratory standard forms are designated by alphanumerics (e.g., NEP-1, DOH-4149) both within the text and in the table of contents of the nuclear emergency procedure appendices; however, the forms themselves have no alphanumeric designation – this should be corrected to enhance ease of use.*<br><br>*P. I-7, Section I, Para 5.9 - Massachusetts no longer has a plant within the 50-mile EPZ of NYS since Yankee Rowe is decommissioned.*<br><br>Procedure K, Att 1 - *Vermont Yankee is within 50 miles of NYS and is not included on the map.* | | | |
| J.12 | Section III, subsection 2.1.9 of the plan states that local agencies and the American Red Cross share primary responsibility for the registration and monitoring of evacuees at Reception Centers. In the same section, the plan specifies the assistance to local governments provided by the following agencies: SEMO (coordinate State assistance for monitoring of evacuating personnel, if requested by local government); Department of Social Services (if requested, assist in the registration of evacuees and coordinate activities of Red Cross and other recognized organizations). The details and procedures for monitoring and registering evacuees at reception centers are contained in the county RERPs. | I | Met | The State plan contains sufficient detail to meet the requirement. The State plan also refers to the county radiological emergency preparedness program plans on this issue. |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | **Rockland County and Orange County Plans discuss requesting from New York State approximately 30 Monitoring Teams to assist in Monitoring evacuees from the Park, if required (ref. Rockland REPP, p. III-21, B.7.b and Orange County RERP, p. I-11, and p. II-22.). The New York State Radiological Emergency Preparedness Plan does not adequately address the resources necessary to accommodate such a request. Attachment 6 to Procedure B indicates that this monitoring will occur at the Orangeburg Armory and will be conducted by staff of the New York Guard. There are no details on activation, mobilization times, equipment availability or procedures to be used. Registration of evacuees is also not addressed.** | | | |
| K.3.a | Radiological exposure control for emergency personnel is addressed briefly in the New York State plan in Section III.2.7, pages III-42 and III-43. Issuing dosimetry is noted briefly. Appendix G, page 13, gives a statewide inventory of dosimetry available; further discussion of instrument inventory and maintenance is given in Appendix G, pages G-4 and G-5.*In Section 7.0 ("Ingestion Pathway Teams") of Procedure G "Radiological Exposure Control Procedures," a discussion of radiological exposure procedures for ingestion pathway teams is expected. However, this section instead addresses other topics including milk sampling procedures (which would more appropriately be dealt with in Procedure M), personnel training, and sampling agencies.* | I | | |

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| | *Attention should be given to exposure control for sampling teams, and this is the appropriate place to address that topic. (Procedure M on page M-1 does call for dosimetry for sampling teams; further information should appear in Procedure G.).*<br><br>**Procedure G Attachment 6 item 4 (on page 1) states "Part 3, Section 1, G.4.2, of the New York State Radiological Emergency Preparedness Plan outlines further the requirements and procedures for permanent record dosimeters"; however, no such reference was located in the plan.**<br><br>Dosimetry for laboratory personnel is outlined in Procedure N, Section 3.6, pages 6 and 7; only film badges and TLDs are specified for use.<br><br>Section III, subsection 2.7, Emergency Personnel – Radiological Exposure Control, p. III-42: Do you intend to "minimize" or "reduce" radiological exposure of emergency response personnel? | | | |
| K.3.b | Radiological exposure control for emergency personnel is addressed briefly in the New York State plan in Section III.2.7, pages III-42 and III-43. Recording radiological doses is noted in the exposure control procedures listed. Further information is provided in Procedure G. Procedure G section 5.5.15 page G-9 states "Such notification will be made when fixed contamination exceeds 1 mR/hr or whenever the whole body cumulative dose reaches a multiple of 3 rem". *Notification at doses* | I | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | *that are multiples of 3 rem makes no sense; the statement should be modified to state explicitly at what dose (e.g., a total of 3 rem) or doses notifications should occur.*<br><br>**Personnel exposure guidance as discussed in Procedure G, pages G-1 through G-3, does not address the application of a conversion factor to dosimetry measurements in order to correct for TEDE doses.**<br><br>*It is also suggested that the "Emergency Worker Exposure Record Card be modified to accommodate records of monitoring and decontamination at the PMC or special facility for decontamination, as specified in Procedure G sections 5.5.7 through 5.5.10.*<br><br>Emergency worker exposure control procedures (Attachment 3 to Procedure G) indicate that emergency workers should read and record their dosimeter readings every 15 to 30 minutes following a release. Attachments 5, 6, 7, 8, 9, and 10 to Procedure G do not appear to be referenced from the text of Procedure G, and should be.<br><br>**Appendix C, second paragraph: The reference "Part II, Section I, G-5 of the State REP Plan" is not readily found.**<br><br>**Procedure H, page H-3, 9th diamond, identifies one of the most important assessment functions** | | | |

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| | **performed by the State Department of Health, which is to calculate the ratio of the total effective dose equivalent (TEDE) to the dosimeter reading and provide the multiplication factor to State and local staff as appropriate. The State REP Plan does not contain the calculation method to implement this function.** | | | |
| K.4 | Section III, subsection 2.7 of the plan specifies the decision chain for authorizing emergency workers to incur exposure in excess of the general public protective action guide. If an accumulated gamma dose of 3R is registered on a self-reading dosimeter, the worker is to inform his/her supervisor or the appropriate EOC and request instructions. Doses in excess of 5 rem TEDE or 25 rem CDE Thyroid must be authorized by the Commissioner of the NYS DOH. The plan recognizes that different limits for reporting indicated dosimeter readings may need to be specified based on the type(s) of radioactive materials released.<br><br>*Procedure G, Att 8 - The copy of Reg Guide 8.13 provided has been superceded by Rev. 3, June 1999. The attachment should include the Reg. Guide Rev. or date to facilitate updating of documents.* | *A* | | |
| K.5.a | Procedure G, "Radiological Exposure Control Procedures," section 5.3.4 sets the action level for determining the need for decontamination at a survey instrument reading in excess of 0.1 mR/hr above | *A* | | |

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| | background. *The procedures indicate that the monitoring should be conducted with an "open window" and therefore 0.1 mR/hr is not an appropriate unit.* The same action level is used for both personnel and equipment. | | | |
| K.5.b | Section III, Part 2.7, page III-43 states that DOH Assessment and Evaluation supervisor will activate State Emergency Worker PMCs at a SAE ECL. Section 5.1 of Procedure G states that the location of these State PMCs is shown in Appendix D. *The locations are actually shown in Appendix C (this minor error should be corrected).* There are two State PMCs designated for the Ginna and Nine Mile/Fitzpatrick sites and four for the Indian Point site. **There are no procedures to activate or mobilize staff to these centers. There are no floor plans for any of the centers and there is no equipment specified for any site.**<br><br>Procedure G describes, in very general terms, the requirements for the PMCs and process for radiological monitoring and decontamination of personnel and equipment.<br><br>**Section 5.3.2 states that monitoring will be performed by State/County agency personnel. The County plans must be reviewed to assure that this responsibility has been considered in the planning process (see J.12 comment).**<br><br>Individuals whose decontamination is complicated | I | | |

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| | by the presence of wounds will be referred to a designated medical facility for treatment and decontamination. | | | |
| L.1 | The plan states that primary and backup hospitals for the treatment of contaminated injured individuals have been identified. These (MS-1) hospitals are listed in Appendix F of the plan where two hospital each are designated for the Ginna and Nine Mile/Fitzpatrick sites and four hospitals are designated for the Indian Point site. | A | | |
| L.3 | Appendix F to the plan contains a listing of medical facilities within the state considered capable of providing medical support for contaminated injured individuals. The Appendix states that the listed facilities are licensed under that part of the New York Sanitary Code dealing with ionizing radiation as having nuclear medicine departments. As a result, the facilities have procedures, trained personnel and equipment to deal with radiological contamination. | A | | |
| L.4 | This activity is assigned to the local risk County plans with supplemental support from the State. Section III, part 2.1.11 of the plan indicates that annual training is provided to selected medical transportation providers in the vicinity of each nuclear power plant site for the safe pre-hospital care and transportation of contaminated injured individuals. | A | Met | The State plan refers to the county radiological emergency preparedness program plans (EMS Section) on this issue. |
| M.1 | Section IV of the plan discusses activities occurring | *A* | | |

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| | during the late phase of a nuclear emergency. A Recovery Committee having authority and major responsibilities to make decisions relating to late phase activities will be appointed by the Disaster Preparedness Commission. The New York State Commissioner of Health will continue to have responsibility for recommending actions such as relaxing protective actions and allowing reentry into evacuated areas. The plan states that before assessing reentry of the public, it is necessary for the Accident Assessment staff to ensure that the source of the release or the threat of a release is under control. Decisions to allow reentry will also be based on the analysis of survey results including aerial monitoring data, ground monitoring and sample isotopic analysis to determine the location of the isodose line corresponding to the relocation PAG of 2 rem first year. Subsection 3.6 of the plan states that persons previously evacuated from non-contaminated areas will be allowed to return. Return orders are to be formulated in conjunction with local chief executives and shall be issued via media releases and announcements at congregate care centers. Persons evacuated from contaminated areas outside the restricted zone will be allowed to return on a gradual basis as confidence is gained from sample analysis and field measurements that the relocations PAGs specified in Table 1 of Section IV will not be exceeded. Procedure L is a generalized Relocation/Return/Reentry procedure to be used by the DPC member agencies in coordination with affected counties. *The State REP Plan differs slightly* | | | |

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| | *from the County Plans in that the State REP Plan identifies a quarterly exposure limit of 1.25 rem for entry to restricted zones. Section IV, Table 2, page IV-9. The County Plans seems to use the 5 rem limit. There should be consistency between the State and County Plans in regard to the re-entry exposure limits.* | | | |
| M.3 | Section IV of the plan states that response organizations will be notified that recovery activities are being initiated via the Executive Hotline, the RECS line, EOC briefings and press releases. | A | | |
| M.4 | Attachment 1 to Procedure H, section 5.0 states that technical assistance from Brookhaven National Laboratory is used to calculate total population exposure. | A | | |
| N.1.a | Section II subsection 3.7 of the plan states that an annual exercise of the NYS plan will be conducted. | A | | |
| N.1.b | Procedure F lays out the process for conducting exercises of the plan and preparedness. | A | | |
| N.2.a | Procedure F, Section 2.3 lists the frequency of testing for the specified types of communication drills. | A | | |
| N.2.d | Procedure F, Section 2.3 states that radiological monitoring drills will be conducted annually. The drills will include the collection and analysis of water, vegetation, soil and air samples. Communications used for reporting sample results | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | and the means for record keeping will also be tested. | | | |
| N.2.e | Procedure F, Section 2.3 states that health physics drills will be conducted semi-annually. | A | | |
| N.3.a | Procedure F, Section 3.2 states that the SEMO will coordinate the establishment of exercise objectives and evaluation criteria. | A | | |
| N.3.b | Procedure F, Section 3.2 states that the SEMO will establish the date and time of each exercise. | A | | |
| N.3.c | Procedure F, Section 3.2 states that the scenario to be used will include a time schedule of real and simulated events | A | | |
| N.3.d | See comment for N.3.c. | A | | |
| N.3.e | Procedure F states that a narrative summary of each drill and exercise will be included in the scenario. | A | | |
| N.3.f | Procedure F, Section 3.2 states that the SEMO will make arrangements for materials to be provided to RAC members and other evaluators. | A | | |
| N.4 | Procedure F, section 4.2 states that qualified evaluators will critique the exercises. A critique will be scheduled as soon as practicable after each exercise. | A | | |
| N.5 | Procedure F, Section 4.2 states that each organization establishes the means for evaluating | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | observer and participant comments on areas needing improvement. Each organization establishes management control to ensure corrective actions are implemented. | | | |
| O.1 | Section II, subsection 3.7.1 of the plan states that the SEMO sponsors a continuing training program for State and local officials having disaster responsibilities. This organization is responsible for coordination and delivery of training. | A | | |
| O.1.b | Section II, subsection 3.7.1 of the plan states that the SEMO sponsors a continuing training program for State and local officials having disaster responsibilities. This organization is responsible for coordination and delivery of training. | A | | |
| O.4.a | Procedure F, Attachment 1 describes the topics covered in training provided to public officials. | A | | |
| O.4.b | Procedure F, section 2.0 states that training will be provided to accident assessment personnel. | A | | |
| O.4.c | Procedure F, Attachment 3 describes the topics covered in training provided to radiological monitoring teams and analysis personnel. | A | | |
| O.4.d | Procedure F, section 2.0 states that training will be provided to police, security and fire-fighting personnel | A | | |
| O.4.f | Procedure F, section 2.0 states that training will be | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Inadequate (I) | State Rating | Draft State Report Comments |
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| | provided to medical and rescue personnel. | | | |
| O.4.h | See comment for O.4.f | A | | |
| O.4.j | Procedure F, section 2.0 states that training will be provided to Command and control staffs, key personnel assigned to EOCs and public information personnel. | A | | |
| O.5 | Section II, subsection 3.7 of the plan states that training and retraining of State and local personnel is provided through a variety of means including formal courses, seminars, conferences, drills and exercises. | A | | |
| P.1 | Procedure F, section 2.0 states that training will be provided to key agency personnel assigned to State and county EOCs. **The criterion specifies that training be given to staff responsible for planning.** | I | | |
| P.2 | Procedure A, Section 2.0 identifies the Director of the SEMO as being responsible for the administration of the NYS REPP. | A | | |
| P.3 | Procedure A, Section 2.2.1 and 2.2.2 identify updating the plan and coordinating the plan with other agencies as two responsibilities of the Director of the SEMO. | A | | |
| P.4 | Procedure A, Section 2.2.3 states that the Director of the SEMO is responsible for the annual review and update of the plan. | A | | |

| Element | FEMA/RAC Internal Comment(s) | Rating Adequate (A) Iadequate (I) | State Rating | Draft State Report Comments |
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| P.5 | Procedure A, Section 3.1 states that the Director of the SEMO will control the distribution of the plan to all officials as required. | A | | |
| P.6 | A detailed listing of support plans is contained in Section I, subsection 8.0 of the plan. | A | | |
| P.7 | Appendix I of the plan contains a listing of procedures and the sections of the plan they are used to implement. *There are errors in the Appendix that been discussed above.* | *A* | | |
| P.8 | Appendix H of the plan contains a cross-reference of the plan and procedures to the criteria contained in NUREG-0654 | A | | |
| P.10 | Procedure A, section 3.2.3 states that the Director of the SEMO will review and update quarterly lists of telephone numbers of key personnel. *Procedure B, Attachment 11, page 2 needs to be updated to reflect the new telephone numbers for the United States Department of Agriculture. The new telephone number is 202-690-6486.*<br><br>*P. I-9, Section I, Para 5.2.3 - Oyster Creek is owned by Amergen and operated by Exelon.*<br><br>*Procedure B, Att 4, p.1 - List needs to be updated; Jay Dunkleberger retired.*<br><br>*Procedure B, Att 11, Contact List - This list is very outdated, e.g., DOE-BAO (RAP); EPA Reg 11; NRC* | *A* | | |

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| | *Reg 1, NRC Operations Center; etc.* | | | |

A = Adequate.
I = Inadequate. Revise the plan based on comments/suggestions.
*A* = *Comments in italics should be addressed.*

# RATING SUMMARY
# NEW YORK STATE REPP – FEBRUARY 2001

| Element | RAC Rating | Witt Rating | Element | RAC Rating | Witt Rating | Element | RAC Rating |
|---|---|---|---|---|---|---|---|
| A.1.a | Adequate | Met | H.3 | Adequate | Met | M.1 | *Adequate* |
| A.1.b | Inadequate | | H.4 | Inadequate | Met | M.3 | Adequate |
| A.1.c | Inadequate | | H.7 | Adequate | Met | M.4 | Adequate |
| A.1.d | *Adequate* | | H.10 | Adequate | | N.1.a | Adequate |
| A.1.e | Adequate | Met | H.11 | Inadequate | | N.1.b | Adequate |
| A.2.a | Inadequate | | H.12 | Adequate | | N.2.a | Adequate |
| A.2.b | Adequate | | I.7 | *Adequate* | | N.2.c | Adequate |
| A.3 | Inadequate | Not Met | I.8 | Adequate | Met | N.2.d | Adequate |
| A.4 | Adequate | Met | I.9 | *Adequate* | Met | N.2.e | Adequate |
| C.1.a | *Adequate* | | I.10 | Inadequate | | N.3.a | Adequate |
| C.1.b | *Adequate* | | I.11 | Inadequate | | N.3.b | Adequate |
| C.1.c | Adequate | | J.2 | Adequate | Met | N.3.c | Adequate |
| C.2.a | *Adequate* | | J.9 | Inadequate | | N.3.d | Adequate |
| C.3 | Adequate | | J.10.a | Adequate | Met* | N.3.e | Adequate |
| C.4 | Inadequate | | J.10.b | Adequate | Met* | N.3.f | Adequate |
| D.3 | Adequate | | J.10.c | Adequate | Met* | N.4 | Adequate |
| D.4 | Adequate | | J.10.d | *Adequate* | Met* | N.5 | Adequate |
| E.1 | Inadequate | | J.10.e | Inadequate | Met* | O.1 | Adequate |
| E.2 | Inadequate | Met | J.10.f | *Adequate* | Met* | O.1.b | Adequate |
| E.5 | Inadequate | | J.10.g | Inadequate | Met* | O.4.a | Adequate |
| E.6 | Inadequate | | J.10.h | Adequate | Met* | O.4.b | Adequate |
| E.7 | Inadequate | Met | J.10.i | *Adequate* | Met* | O.4.c | Adequate |
| F.1.a | *Adequate* | Met | J.10.j | Adequate | Met* | O.4.d | Adequate |
| F.1.b | *Adequate* | Met | J.10.k | Adequate | Met* | O.4.f | Adequate |
| F.1.c | Inadequate | Met | J.10.l | *Adequate* | Met* | O.4.g | Adequate |
| F.1.d | *Adequate* | Met | J.10.m | Inadequate | | O.4.h | Adequate |
| F.1.e | *Adequate* | Met | J.11 | Inadequate | | O.4.j | Adequate |
| F.2 | Adequate | | J.12 | Inadequate | Met | O.5 | Adequate |
| F.3 | Adequate | | K.3.a | Inadequate | | P.1 | Inadequate |
| G.1 | Adequate | Met | K.3.b | Inadequate | | P.2 | Adequate |
| G.2 | Adequate | Met | K.4 | *Adequate* | | P.3 | Adequate |
| G.3.a | Adequate | Met | K.5.a | *Adequate* | | P.4 | Adequate |
| G.4.a | Adequate | Met* | K.5.b | Inadequate | | P.5 | Adequate |
| G.4.b | Adequate | Met* | L.1 | Adequate | | P.6 | Adequate |
| G.4.c | Adequate | Met* | L.3 | Adequate | | P.7 | *Adequate* |
| G.5 | Adequate | | L.4 | Adequate | Met | P.8 | Adequate |
| | | | | | | P.10 | *Adequate* |

**Rating Categories:**

Adequate, The statements and concepts in the plan adequately address the planning criterion.

Inadequate, The statements and concepts in the plan do not adequately address the planning criterion.

Met* Comment provided for multiple sub-elements together.

| Planning Standard/Requirement | Source Document | Where Addressed in the Plan | Requirement Met or Not Met | Comments |
|---|---|---|---|---|
| Evacuation (urgent removal of persons/animals) and Sheltering (supplemented by bathing and changing of clothes) to protect the public from exposure to direct radiation and inhalation from airborne plume. | EPA 400<br>1-3<br>2.3.1<br>5.5.1<br>5.5.2<br>5.5.3<br>Appendix E | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Relocation and decontamination for protection against whole body dose (external exposure) due to deposited material and from inhalation of any resuspended radioactive particulate. | EPA 400<br><br>1.4<br>Appendix E | Sect III<br>11,12 | Met | Note that relocation and evacuation are two distinct actions.<br><br>The State plan also refers to the county radiological emergency preparedness program plans. |
| All PAG's should be consistent for all of the population. | EPA 400<br><br>2.1 (2.2) | Sect I 4<br>Sect III 7,8<br>26-41<br>Sect IV 7,8 | Not Met | All PAGs are consistent for all of the population except for prisons and prisoner considerations |

| Planning Standard/Requirement | Source Document | Where Addressed in the Plan | Requirement Met or Not Met | Comments |
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| Mechanism for obtaining detailed content of the plume. | EPA 400 2.2 (2-4) | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Guidance on dose limits cited in plan. | EPA 400 2.5 (2-9) | | Not Met | The plan states that means will be provided, but does not tell exactly how and no dose limits were found. |
| Coordination and recommendations based on plant conditions, for early evacuation and/or sheltering in pre-designated areas. Early estimates of the various components of projected dose to the population at the site boundary as well as more s\distant locations. Estimated time frames as soon as relevant source or release data becomes available. | EPA 400 4.1 (4-1) | Sect I 4<br><br>Sect III 7,8,26-41<br><br>Sect IV 7,8 | Met | Recommendations were coordinated with local/State authorities and made available on a timely basis.<br><br>Offsite notifications are covered for the plant in 10 CFR Appendix E Part 50.<br><br>The State plan refers to the county radiological emergency preparedness program. |
| Designation of an emergency planning zone zone for protective action for plume exposure. | EPA 400 5.2.2 (5-3) | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Establishment of Exposure Patterns using atmospheric transports and field teams including plume tracking. | EPA 400 5.2.2 (5-4) | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Air sampling techniques/flow rates/time in plume/analysis information. | EPA 400 5.3 | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |

| Planning Standard/Requirement | Source Document | Where Addressed in the Plan | Requirement Met or Not Met | Comments |
|---|---|---|---|---|
| Procedures for calculating dose conversion factors and derived response levels. | EPA 400 5.4; 5.6 | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Documentation of sequence of events. | EPA 400 7.1.3 (7-4) | | Not Met | The State's methodology for event documentation is not specified in the plan. |
| Recommendations for surface contamination limits. | EPA 400 7.6.3 7.6.1 | Assigned to respective counties | Met | The State plan assigns this requirement to the respective county radiological emergency preparedness program. |
| Dosemetric models, agricultural transport models, dietary intake, and other calculations relating to potential dose. | EPA 400 7.6.2 7.4 7.3 Appendix B | Sect III 9, 26-33 Proc H Proc J Sect III 34-41 Proc K Proc L | Met | The State plan refers to the county radiological emergency preparedness program plans on this issue. |
| Disseminating information to the public | 10 CFR 50 App. E | Proc C 1-3 Sect III 10 | Met | The State plan refers to the county radiological emergency preparedness program plans on this issue. |

| Planning Standard/Requirement | Source Document | Where Addressed in the Plan | Requirement Met or Not Met | Comments |
|---|---|---|---|---|
| Personnel monitoring | 10 CFR 50<br><br>App. E | | Not Met | A description of personnel monitoring should appear in the local and State plans, but it is not specifically mentions here. Although DOH may provide monitoring and staffing of monitoring centers, all monitoring devices and methods should be discussed in the State plan. The State plan refers to the NFO site emergency plans on this issue, as well as the County REPP plans. |