



FEMA

APR 22 2013

Mr. Charles A. Casto
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60542-4351

Dear Mr. Casto:

Enclosed is a copy of the Final After Action Report/Improvement Plan for the Radiological Emergency Preparedness (REP) Full Participation Plume and Ingestion Exposure Pathway Exercise conducted on October 30 and 31, 2012, for the Palisades Nuclear Power Plant. The State of Michigan, the State of Indiana, and the Michigan risk counties of Allegan, Berrien and Van Buren, participated in this exercise. The utility owner and operator, Entergy Nuclear Operations, Incorporated, also participated in this exercise.

No Deficiencies were identified for the State of Michigan or for Allegan, Berrien, and Van Buren Counties during this exercise.

There was one Area Requiring Corrective Action (ARCA) identified for the State of Michigan during this exercise. The ARCA identified for the State of Michigan, number 44-12-4c1-A-01, was under Criterion 4.c.1 - The laboratory is capable of performing required radiological analyses to support protective action decisions, whereas the Michigan Department of Environmental Quality (MDEQ) Radiological Protection Laboratory (RPL) facility, equipment and staff did not demonstrate the capability to process, analyze and store radiological samples and report the results of their analyses in a timely and accurate manner. The re-demonstration of this criterion will occur in conjunction with the DC Cook Plume Exposure Pathway exercise in June, 2013.

There were no prior ARCAs identified for the State of Michigan during the March 2, 2010, Palisades Nuclear Power Plant REP exercise which required re-demonstration during this exercise.

There were three planning issues identified for the State of Michigan during the March 1, 2011, D. C. Cook Nuclear Plant REP exercise, two of which were closed during this exercise. Based on exercise performance, planning issues 15-11-3a1-P-02, under Criterion 3.a.1, and planning issue 15-11-6a1-P-02, under Criterion 6.a.1, have been closed.

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Planning issue 15-11-4a3-P-03, under Criterion 4.a.3, was not satisfactorily re-demonstrated. Planning issue 44-12-4a3-P-02, under Criterion 4.a.3, describes the observations from this exercise. Based on post-exercise analysis submitted by MDEQ and evaluated by FEMA, MDEQ's air sample collection procedure and equipment have been demonstrated to satisfy the minimum detection requirements and both of the above planning issues have also been closed.

There were two Criteria that were not demonstrated by the State of Michigan during this exercise. The MDEQ Radiological Protection Laboratory (RPL) was not able to demonstrate Criteria 1.e.1 and 3.a.1. The re-demonstration of these criteria will occur in conjunction with the DC Cook Plume Exposure Pathway exercise in June 2013.

There were no ARCAs or Planning Issues identified for Van Buren County during this exercise.

There were no ARCAs or Planning Issues identified for Allegan County during this exercise.

There was one Planning Issue identified for Allegan County during the March 2, 2010, Palisades Nuclear Power Plant REP exercise: Planning Issue number 44-10-6a1-P-03, under Criterion 6.a.1, was closed during this exercise.

There were no ARCAs or Planning Issues identified for Berrien County during this exercise.

No Deficiencies were identified for the State of Indiana during this exercise.

There was one ARCA identified for the State of Indiana during this exercise. The ARCA, number 44-12-3a1-A-03, was identified under Criterion 3.a.1 – OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plans/procedures, whereas the Indiana Forward Operations Center (FOC) Dosimetry Coordinator was not familiar with dosimeter charging and dosimeters were issued that were not charged and ready for use. This criterion will be re-demonstrated at a date to be coordinated upon completion of the corrective actions identified in this report.

There were no Planning Issues identified for the State of Indiana during this exercise.

There were six Criteria that were not demonstrated by the State of Indiana during this exercise. Exercise participants at the Indiana State Emergency Operations Center (EOC) were not provided sufficient information and opportunity to demonstrate Criteria 1.c.1, 2.d.1, 3.e.1, 3.e.2 and 3.f.1. Additionally, Criterion 2.a.1 was not demonstrated at the Forward Operations Center. These criteria will be re-demonstrated at a date to be coordinated upon completion of the corrective actions identified in this report.

There were no prior ARCAs or Planning Issues identified for the State of Indiana which required re-demonstration during this exercise.

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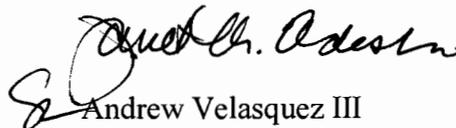
A detailed discussion of these issues can be found in Part IV of this report.

Based on the results of the October 30 and 31, 2012 exercise, the offsite radiological emergency response plans and procedures for the State of Michigan, the State of Indiana, and the Michigan counties of Allegan, Berrien and Van Buren, site-specific to the Palisades Nuclear Power Plant can be implemented, and are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public in the event of a radiological emergency at these site.

Therefore, the Title 44 CFR, Part 350, approval of the offsite radiological emergency response plans and procedures remains in effect. Copies of this Report were transmitted to the DHS/FEMA National Office, Nuclear Regulatory Commission National Office, the State of Michigan and the State of Indiana.

If you have any questions, please contact William King, Technological Hazards Branch Chief, at (312) 408-5575.

Sincerely,


Andrew Velasquez III
Regional Administrator

Enclosure (1)