U.S. Department of Homeland Security Region V 536 South Clark Street, Floor 6 Chicago, IL 60605



OCT 1 5 2013

NRC Headquarters Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

To Whom It May Concern:

On June 20, 2013, the U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA), Region V, conducted an evaluation of Kewaunee County's new Emergency Operations Center (EOC) designated for use in the event of an incident at either the Kewaunee Power Station or the Point Beach Nuclear Plant

Based on the results of the June 20, 2013, evaluation, the Kewaunee County EOC was found sufficient for conduct of emergency response operations for Kewaunee County personnel in the event of a radiological emergency at the Kewaunee Power Station or the Point Beach Nuclear Plant.

Therefore, the Title 44 CFR, Part 350, approval of the offsite radiological emergency response plans and preparedness for the State of Wisconsin site-specific to the Kewaunee Power Station, granted on June 15, 1985, remains in effect.

If you have any questions, please contact William E. King, Chairman, Regional Assistance Committee, DHS/FEMA, Region V, at (312) 408-5575.

Sincerely,

Andrew Velasquez III Regional Administrator

Enclosure (1)





# **Kewaunee Power Station**

# After Action Report/ Improvement Plan

Exercise Date - June 20, 2013

Radiological Emergency Preparedness (REP) Program



Published October 11, 2013

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# Kewaunee Power Station After Action Report/Improvement Plan

Unclassified Radiological Emergency Preparedness Program (REP)

Published October 11, 2013

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After Action Report/Improvement Plan

# **EXECUTIVE SUMMARY**

On June 20, 2013, the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA), Region V, in an out-of-sequence demonstration, evaluated a new Emergency Operations Center (EOC) located in Kewaunee County. This new EOC would become operational should an incident occur at the Kewaunee Power Station (KPS) or the Point Beach Nuclear Plant (PBNP).

In accordance with DHS/FEMA policies and guidance concerning the operations of a new facility. The EOC certification was conducted in Kewaunee County to ensure that the facility can support emergency operations.

This After Action Report/Improvement Plan (AAR/IP) contains the evaluation of the following out-of-sequence demonstration:

• Kewaunee County - Emergency Operations Center

## INTRODUCTION – EXERCISE BASIS

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. The FEMA's activities are conducted pursuant to Title 44 of the Code of Federal Regulations (CFR) Parts 350 "Review and Approval of State and Local Radiological Emergency Plans and Preparedness", 351 "Radiological Emergency Planning and Preparedness" and 352 "Commercial Nuclear Power Plants: Emergency Preparedness Planning" (Commonly referred to as 44 CFR 350 through 352). These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

The FEMA Regulation 44 CFR 350 establishes the policies and procedures for the DHS/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 governments' participation in joint exercises with licensees.

The responsibilities of the DHS/FEMA 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 Federal agencies with responsibilities in the radiological emergency planning process:
  - U.S. Department of Agriculture
  - U.S. Department of Commerce
  - U.S. Department of Energy
  - U.S. Department of Health and Human Services
  - U.S. Department of the Interior
  - U.S. Department of Transportation
  - U.S. Environmental Protection Agency
  - U.S. Food and Drug Administration and
  - U.S. Nuclear Regulatory Commission.

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

Formal submission of the RERPs for the KPS to the FEMA Region V by the State of Wisconsin and involved local jurisdictions occurred on January 21, 1981. Formal approval of these RERPs was granted by the FEMA on August 30, 1984, under 44 CFR 350.

The findings presented in this AAR/IP are based on the evaluations of the Federal evaluation team, with final determinations made by the DHS/FEMA Region V RAC Chairperson, and approved by the DHS/FEMA Headquarters.

The criteria utilized in the DHS/FEMA evaluation process are contained in:

• REP Program Manual Dated June 2013

Section 1 of this report, entitled "Exercise Overview", presents information pertaining to the team that planned and coordinated the demonstration. This section also provides a listing of all participating jurisdictions and functional entities that were evaluated.

Section 2 of this report, entitled "Exercise Design Summary", contains the purpose and design of the demonstration and presents basic information and data relevant to the demonstration scenario.

Section 3 of this report, entitled "Analysis of Capabilities," presents detailed information on the demonstration of applicable demonstration criteria at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. This section also contains: (1) descriptions of all Deficiencies and Areas Requiring Correction Actions (ARCAs), and Plan Issues (if any) assessed during this demonstration, recommended corrective actions, and the State and local governments' schedule of corrective actions, if applicable, for each identified demonstration issue; and (2) descriptions of unresolved ARCAs assessed during previous demonstrations and the status of the OROs' efforts to resolve them.

Section 4 of this report, entitled "Conclusion" presents the DHS/FEMA summary of overall demonstration conduct and results as evaluated against the requirements of 44 CFR 350.

Based on the results of the June 20, 2013, evaluation, the Kewaunee County EOC was found sufficient for conduct of emergency response operations for Kewaunee County personnel in the event of a radiological emergency at the Kewaunee Power Station or the Point Beach Nuclear Plant.

## **SECTION 1: EXERCISE OVERVIEW**

## **1.1 Exercise Details**

## **Exercise Name**

Kewaunee Power Station

#### Type of Exercise

Plume

#### **Exercise Date**

June 20, 2013

## Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

## **Scenario Type**

Radiological Emergency

## **1.2 Exercise Planning Team Leadership**

William King Chairman DHS/FEMA Region V Radiological Assistance Committee 536 S. Clark Street Chicago, Illinois, 60605 312-408-5575 william.king5@fema.dhs.gov

Gary Naskrent Exercise Director DHS/FEMA Region V REP Supervisory Team Leader 536 S. Clark Street Chicago, Illinois, 60605 312-408-5214 gary.naskrent@fema.dhs.gov

James King Site Specialist DHS/FEMA Region V Technological Hazards Specialist 536 S. Clark Street Chicago, Illinois, 60605 312-408-5596 james.king@fema.dhs.gov

## **1.3 Participating Organizations**

Agencies and organizations of the following jurisdictions participated in the Kewaunee Power Station exercise:

**Risk Jurisdictions** 

Kewaunee County Emergency Operations Center

# **SECTION 2: EXERCISE DESIGN SUMMARY** 2.1 Exercise Purpose and Design

On June 20, 2013, the U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA), Region V, conducted an evaluation of Kewaunee County's new Emergency Operations Center (EOC) designated for use in the event of an incident at either the Kewaunee Power Station or the Point Beach Nuclear Plant

## 2.2 Exercise Objectives, Capabilities and Activities

This evaluation focused on the following capabilities/criterion:

- ORO demonstration of effective Support Operations and Facilities
- Criterion 1.b.1. facilities

## 2.3 Scenario Summary

There was no scenario for the Kewaunee County Emergency Operations Center (EOC) evaluation since the EOC was being evaluated as a new facility.

# SECTION 3: ANALYSIS OF CAPABILITIES 3.1 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 June 20, 2013, Kewaunee County Emergency Operations Center certification.

Each jurisdiction and functional entity was evaluated based on its demonstration of criteria delineated in the Radiological Emergency Preparedness Program Manual dated June 2013. Detailed information on the demonstration criteria used in this demonstration are found in this section of this report.

## **3.2 Summary Results of Exercise Evaluation**

The matrix in Table 3.1, on the following page(s), presents the status of all demonstration criteria from the June 2013 REP Program Manual, which were scheduled for demonstration by all participating jurisdictions and functional entities. Demonstration criteria are listed by number and the status of those criteria are indicated by the following letters:

- M Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior exercises)
- D Deficiency/(ies) assessed
- A ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)
- N Not Demonstrated (Reason explained in Section 4.2)
- Blank Not scheduled for demonstration

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Table 3.1 - Summary of Exercise Evaluation		
DATE: 2013-06-20 SITE: Kewaunee Power Station, WI		W - EOC
M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		KE
Emergency Operations Management		<u> </u>
Mobilization	<u> 1a1</u>	
Facilities	161	M
Direction and Control	1c1	
Communications Equipment	<u>1d1</u>	
Equipment and Supplies to Support Operations	<u>1e1</u>	
Protective Action Decision Making		$\square$
EW Exposure Control Decisions	2a1	4
PARs	<u>2b1</u>	
PADs	2b2	
PADs for Disabled/Functional Needs	2c1	
Ingestion PADs	2d1	
RRR Decisions	2e1	1
Protective Action Implementation		
EW Exposure Control Implementation	3a1	
KI Public/Institutionalized	361	
PAD Implementation Disabled/Functional Needs	3c1	
PAD Implementation Schools	3c2	
TACP Establishment	3d1	
Impediments	3d2	
Implement Ingestion PADs	3e1	
Ingestion Pathway Decisions	3e2	
Implementation of RRR Decisions	3f1	
Field Measurement and Analysis		
RESERVED	4a1	
Field Team Management	4a2	
Field Team Operations	4a3	
Field Team Sampling	461	
Laboratory Operations	4c1	
Emergency Notification and Public Info		
Initial Alert & Notification	5al	
RESERVED	5a2	
Backup Alert & Notification	5a3	
Exception Area Alerting	5a4	
Subsequent Information & Instructions	5b1	
Support Operations/Facilities		
Reception Center Operations	6a1	
EW Monitoring & Decontamination	6b1	
Congregate Care	6c1	
Contaminated Injured Transport & Care	6d1	

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## **3.3 Criteria Evaluation Summaries**

## 3.3.1 Risk Jurisdictions

## 3.3.1.1 Kewaunee County - Emergency Operations Center

#### **Criterion 1.b.1:**

Kewaunee County successfully demonstrated the capability to establish sufficient facilities for the conduct of emergency response operations in the event of a radiological emergency at the KPS or the PBNP. The evaluation was conducted during an out-of-sequence activity on June 20, 2013, from approximately 1530 hours, to 1630 hours, at the newly constructed Kewaunee County Emergency Operations Center (EOC): The EOC was located at 625, 3rd Street, Luxemburg, Wisconsin.

The main entrance to the EOC was on the east side of the large indoor arena building opposite of the arena entrance. The inside doors of the EOC were electrically locked and controlled. The doors could only be opened by badged employees. Other entrances to the building were from the arena entrance and the rear of the building that was secured by locked doors with no exterior access.

Security personnel were not assigned, nor needed, during the demonstration, but could be stationed at a desk set up at the entrance to the EOC. The Kewaunee EOC was spacious with 21 workstations each with their own ethernet and phone connection. Each workstation was set up during normal operations but each work area had a laptop computer, plans and procedures, a phone and enough administrative supplies to properly conduct assigned tasks. A floor plan was available; the Work stations were permanently arranged in a "horseshoe" configuration with the Radio Amateur Civil Emergency Services operator and Geographic Information Support in their own room, located at the rear center of the room.

There was an alternate Communications Center being outfitted to allow the county dispatch to use in the case of failure at the primary communications center. This was its own room located at the rear and to the left of the EOC. This was also used as the communications dispatch center during real-world and exercise events to prevent the tie up of the primary center.

The EOC was adequately furnished. Both male and female restrooms were available just outside

of the kitchen entrance and another located in the arena area with showers. The facility has two conference rooms and could be used for meetings or to assemble workers. The facility also had a lunch room and a galley for workers to take breaks located just outside of the EOC.

The EOC had adequate lighting from ceiling lights and windows. Ventilation was adequate. The Kewaunee County EOC had adequate backup power and facilities. By interview, Kewaunee County indicated that the entire building had one 300 kw backup diesel generator with a 500 gallon capacity and could power the entire building for up to four days before refueling. The diesel generator was operationally checked monthly. Each workstation has a universal power source device to keep each station operating until the backup power generators automatically start.

All activities described in the demonstration criterion were carried out in accordance with the plan, procedures, and extent-of-play agreement.

In summary, the status of DHS/FEMA criteria for this location is as follows:

- a. MET: 1.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES RESOLVED: None
- g. PRIOR ISSUES UNRESOLVED: None

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# **SECTION 4: CONCLUSION**

Based on the results of the June 20, 2013, evaluation, the Kewaunee County EOC was found sufficient for conduct of emergency response operations for Kewaunee County personnel in the event of a radiological emergency at the Kewaunee Power Station or the Point Beach Nuclear Plant.

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# **APPENDIX A: EXERCISE TIMELINE**

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No timeline required for this out-of-sequence drill.

# APPENDIX B: EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel who evaluated the Kewaunee Power Station Radiological Emergency Preparedness out-of-sequence demonstrations on June 20, 2013. The Team Leaders are indicated by an asterisk "(\*)" before their names. The organization which each evaluator represents is indicated by the following abbreviations:

DHS/FEMA Department of Homeland Security/ Federal Emergency Management Agency

TITLE	NAME	ORGANIZATION
RAC Chairperson	William E. King	DHS/FEMA Region V
Exercise Director	Gary Naskrent	DHS/FEMA Region V
Site Specialist	James King	DHS/FEMA Region V

## DATE: 2013-06-20, SITE: Kewaunee Power Station, WI

LOCATION	EVALUATOR	AGENCY
Kewaunee County - Emergency Operations Center	*James King	FEMA RV
* Team Leader		

# APPENDIX C: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAR	After Action Report
ARCA	Area Requiring Corrective Action
CFR	Code of Federal Regulations
DHS	Department of Homeland Security
EOC	Emergency Operations Center
FEMA	Federal Emergency Management Agency
IP	Improvement Plan
KPS	Kewaunee Power Station
NRC	Nuclear Regulatory Commission
PBNP	Point Beach Nuclear Plant
RAC	Regional Assistance Committee
REP	Radiological Emergency Preparedness
RERPs	Radiological Emergency Response Plans

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