



FEMA

To: NRC Headquarters Document Control

From: Nan Williams, Regional Assistance Committee Chair, FEMA Region 6

Date: October 12, 2016

Re: Corrected South Texas Project After Action Report/Improvement Plan

Please accept the enclosed South Texas Project After Action Report/Improvement Plan for the plume phase exercise conducted on July 13, 2016. The original report provided had incorrect page numbering which made it appear that pages were missing from the report. Please replace the report provided previously with the enclosed report as the official published report. The page numbering has been corrected in the enclosed report. Please contact Brad DeKorte, South Texas Project Site Specialist, with any questions at brad.dekorte@fema.dhs.gov or (940) 383-7304.

IX49
NRR



South Texas Project

After Action Report/ Improvement Plan

Exercise Date - July 13, 2016

Radiological Emergency Preparedness (REP) Program



FEMA

August 18, 2016

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South Texas Project After Action Report/Improvement Plan

Published August 03, 2016

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EXECUTIVE SUMMARY

On July 13, 2016, a biennial Radiological Emergency Preparedness (REP) exercise was conducted in the plume exposure pathway emergency planning zone (EPZ) around the South Texas Project (STP) located near Wadsworth, Matagorda County, Texas. The U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA), Region VI, evaluated the exercise. The purpose was to assess the level of preparedness of state and local responders to react to a simulated radiological emergency at STP. This exercise was held in accordance with FEMA's policies and guidance concerning the implementation of state and local radiological emergency preparedness plans and procedures.

The previous exercise at this site was conducted on November 05, 2014. The qualifying emergency preparedness exercise to satisfy FEMA rule 44 Code of Federal Regulations 350 requirements for U.S. Nuclear Regulatory Commission licensing to operate the facility was conducted on April 8, 1987.

FEMA, Region VI wishes to acknowledge the efforts of the many individuals in the State of Texas, Matagorda County, Bay City, the City of Palacios and surrounding jurisdictions 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. Cooperation and teamwork of all the participants was evident during this exercise.

This report contains the final written evaluation of the biennial exercise. All state and local organizations, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Deficiencies, no Areas Requiring Corrective Action (ARCA), and no Plan Issues identified during this exercise.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

South Texas Project

Type of Exercise

Plume

Exercise Date

July 13, 2016

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness
Program

Scenario Type

Radiological Emergency

1.2 Exercise Planning Team Leadership

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1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the South Texas Project exercise:

State Jurisdictions

- Texas Department of State Health Services
- Texas Department of Public Safety
- Texas Division of Emergency Management
- Texas State Troopers
- Texas Commission on Environmental Quality

Risk Jurisdictions

Matagorda County

Matagorda County Emergency Management

Matagorda County Sheriff's Office

Bay City

Bay City Police Department

Bay City Volunteer Fire Department

Palacios Police Department

Support Jurisdictions

American Red Cross

Private Organizations

South Texas Project

Federal Jurisdictions

National Weather Service

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

The DHS/FEMA Region VI Office evaluated the exercise on July 13, 2016 to assess the capabilities of the local emergency preparedness organizations in implementing their Radiological Emergency Response Plans and Procedures to protect the public health and safety during a radiological emergency involving South Texas Project (STP). The purpose of this report is to represent the results of the findings on the performance of the offsite response organizations during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and Capabilities/REP Criteria selected to be exercise are discussed in the Exercise Plan (EXPLAN), Appendix C.

2.3 Scenario Summary

The exercise scenario was developed to evaluate the response of the exercise participants to an incident requiring protective actions of the public within the 10-mile Emergency Planning Zone (EPZ) surrounding the South Texas Project (STP). The exercise scenario provided for the evaluation of the Texas Division of Emergency Management (TDEM), Texas Department of State Health Services- Radiation Control Program (DSHS-RCP), and Matagorda County to make protective action decisions for the public.

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 July 13, 2016 exercise to test the offsite emergency response capabilities of state and local governments in the 10-mile Emergency Planning Zone (EPZ) surrounding the South Texas Project (STP).

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of criteria delineated in the exercise evaluation areas as outlined in the Federal Register, Vol. 67, No. 80, "Radiological Emergency Preparedness: Exercise Evaluation Methodology" (April 25, 2002). Detailed information on the exercise evaluation area criteria and the extent of play agreement used in this exercise are found in Appendix C of this report.

3.2 Summary Results of Exercise Evaluation

The matrix presented in Table 3.1, on the following page, presents the status of all exercise evaluation area criteria that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status is indicated by the use of the following letters:

M - Met (No Deficiency or Areas Requiring Corrective Actions [ARCA] assessed and no unresolved ARCA from prior exercises)

D (Level 1) - Deficiency assessed

A (Level 2) - ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)

N - Not Demonstrated (Reason explained)

P - Plan Issue

Table 3.1 - Summary of Exercise Evaluation

DATE: 2014-11-05 SITE: South Texas Project, TX M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated			TDEM-SOC	DD Sub-2C Pierce	DSHS-HQ	DSHS-EOF	TX FMT 1	TX FMT 2	JIC	Mat. Co. EOC	NWS Houston/Galveston
Emergency Operations Management											
Mobilization	1a1	M	M	M	M				M	M	
Facilities	1b1								M	M	
Direction and Control	1c1	M	M	M	M					M	
Communications Equipment	1d1	M	M	M	M	M	M	M	M	M	
Equipment and Supplies	1e1	M	M	M	M	M	M	M	M	M	
Protective Action Decision Making											
EW Exp. Control Decisions	2a1				M					M	
PARs	2b1			M	M						
PADs	2b2									M	
PADs for Disabled/Functional Needs	2c1									M	
Ingestion PADs	2d1										
RRR Decisions	2e1										
Protective Action Implementation											
EW Exp. Control Implementation	3a1				M	M	M			M	
KI Public/Institutionalized	3b1										
PAD Imp. Disabled/Functional Needs	3c1										
PAD Imp. Schools	3c2									M	
TACP Establishment	3d1									M	
Impediments to Evacuation	3d2									M	
Implementation of Ingestion PADs	3e1										
Ingestion Strategies and Information	3e2										
Imp. of RRR Decisions	3f1										
Field Measurement and Analysis											
RESERVED	4a1										
Field Team Management	4a2				M						
Field Team Operations	4a3					M	M				
Field Team Sampling	4b1										
Laboratory Operations	4c1										
Emergency Notification and Public Info											
Initial Alert & Notification	5a1									M	M
Backup Alert & Notification	5a3										
Exception Area Alerting	5a4										
Subsequent Public Information	5b1								M		M
Support Operations/Facilities											
Reception Center Operations	6a1										
EW Monitoring & Decon	6b1										
Congregate Care	6c1										
Contaminated Injured Transport & Care	6d1										

3.3 Criteria Evaluation Summaries

3.3.1 Texas Jurisdictions

3.3.1.1 Texas Division of Emergency Management-State Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.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

3.3.1.2 Department of Public Safety, Disaster District Sub-2C Pierce

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.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

3.3.1.3 Department of State Health Services, Radiation Control Program - Headquarters

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.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

3.3.1.4 Department of State Health Services - Radiation Control Program at the Emergency Operations Facility

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 3.a.1, 4.a.2.
- 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

3.3.1.5 Department of State Health Services - Radiation Control Program Field Monitoring Team One

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 4.a.3.
- 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

3.3.1.6 Department of State Health Services - Radiation Control Program Field Monitoring Team Two

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 4.a.3.
- 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

3.3.1.7 Joint Information Center, Bay City

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

- a. MET: 1.a.1, 1.d.1, 1.e.1, 5.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

3.3.2 Risk Jurisdictions

3.3.2.1 Matagorda County Emergency Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 3.a.1, 3.c.2, 3.d.1, 3.d.2, 5.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

3.3.3 Federal Jurisdictions

3.3.3.1 National Weather Service Houston/Galveston

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

- a. MET: 5.a.1, 5.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

SECTION 4: CONCLUSION

Based on the results of the exercise, the offsite radiological emergency response plans and preparedness for the State of Texas and the affected local jurisdiction are deemed adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public in the event of a radiological emergency. Therefore, 44 CFR Part 350 approval of the offsite radiological emergency response plans and preparedness for the State of Texas site-specific to the South Texas Project will remain in effect.

APPENDIX A: EXERCISE EVALUATORS AND TEAM LEADERS

DATE: 2016-07-13, SITE: South Texas Project, TX

LOCATION	EVALUATOR	AGENCY
Texas Division of Emergency Management-State Operations Center	*Sam Williams	FEMA RVI
Department of Public Safety, Disaster District Sub-2C Pierce	*William McDougall	FEMA RIII
Department of State Health Services, Radiation Control Program - Headquarters	*Bart Freeman	FEMA RIII
Department of State Health Services - Radiation Control Program at the Emergency Operations Facility	*Nan Calhoun Scott Flowerday	FEMA RVI FEMA RVI
Department of State Health Services - Radiation Control Program Field Monitoring Team One	*Tim Pflieger	FEMA RVI
Department of State Health Services - Radiation Control Program Field Monitoring Team Two	*Jeff Clark	FEMA RVI
Joint Information Center, Bay City	*Alberto Sifuentes John Price	FEMA IX FEMA RIII
Matagorda County Emergency Operations Center	*Linda Gee Lee Torres Joe Suders	FEMA RVI FEMA RIII FEMA RIII
National Weather Service Houston/Galveston	Tom Murray	FEMA RIII
* Team Leader		

THE UNITED STATES OF AMERICA

OFFICE OF THE ATTORNEY GENERAL

MEMORANDUM FOR THE ATTORNEY GENERAL

DATE: 10/15/64

TO: THE ATTORNEY GENERAL

FROM: [Name]

SUBJECT: [Subject]

1. [Text]

2. [Text]

3. [Text]

4. [Text]

5. [Text]

6. [Text]

7. [Text]

8. [Text]

9. [Text]

10. [Text]

11. [Text]

12. [Text]

APPENDIX B: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
ARCA	Areas Requiring Corrective Action
AWIPS	Advanced Weather Interactive Processing System
CDE	Committed Dose Equivalent
CP	Control Points
DDC	Disaster District Committee
EAS	Emergency Alert System
ECL	Emergency Classification Levels
EMD	Emergency Management Director
EOC	Emergency Operations Center
EOF	Emergency Operating Facility
EPA	Environmental Protection Agency
EPZ	Emergency Planning Zone
EW	Emergency Worker
FMTL	Field Monitoring Team Leader
GE	General Emergency
HP	Health Physicist
JIC	Joint Information Center
MCEOC	Matagorda County Emergency Operations Center
NWS	National Weather Service
OSA	Offsite Staging Area
PAD	Protective Action Decision
PAR	Protective Action Recommendation
PIO	Public Information Officer
REP	Radiological Emergency Preparedness
SEOC	State Emergency Operations Center
STP	South Texas Project
STPEGS	South Texas Project Electric Generating Station
TEDE	Total Effective Dose Equivalent
TLETS	Texas Law Enforcement Telecommunications System
WCM	Warning Coordination Meteorologist

APPENDIX C: EXERCISE PLAN

Scope

The South Texas Project (STP) Emergency Preparedness Exercise shall demonstrate the key skills of South Texas Project, State of Texas, and Matagorda County response organizations to adequately respond to an incident scenario such that the major elements of the plans and preparedness organizations are tested within an eight-year exercise cycle. The exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. Exercises are conducted as set forth in NRC and FEMA rules and policy.

The exercise will include full activation and participation of the STP Control Room Simulator, Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF) to be evaluated by the Nuclear Regulatory Commission (NRC). The State of Texas, Matagorda County, and Joint Information Center emergency facilities and objectives will be demonstrated and evaluated by the Federal Emergency Management Agency (FEMA) in accordance with the objectives and extent of play in Off-site Objectives.

The exercise will be used to evaluate the ability of the Emergency Response Organization (ERO) personnel to assess and mitigate the emergency situations at the plant and to take actions to assist state and local government organizations in mitigating the radiological consequences to persons in the vicinity of the plant. In addition, the exercise will provide the STP, State of Texas, and Matagorda County with the opportunity to assess the effectiveness of training improvements and modifications made to the Emergency Plans and Procedures.

The following summary indicates which emergency response facilities will participate in the 2014 STP Emergency Preparedness Exercise:

STP Nuclear Operating Company Facilities:

Control Room (CR) Simulator	STP
Technical Support Center (TSC)	STP
Operations Support Center (OSC)	STP
Emergency Operations Facility (EOF)	Bay City, Texas
Joint Information Center (JIC)	Bay City, Texas

State of Texas/Matagorda County Facilities:

State of Texas Operations Center (SOC)	Austin, Texas
Disaster District Sub-2C Emergency Operations Center	Pierce, Texas
Department of State Health Services Operations (DSHS)	Bay City, EOF & RCP Headquarters
Matagorda County, DSHS, DPS PIO's	Bay City, JIC
Matagorda County Emergency Operations Center	Bay City, Texas
Department of State Health Services Staging Area	Bay City, Texas
Department of State Health Services Operations Field Monitoring Teams	10 Mile EPZ
Emergency Alert System: NOAA, National Weather Service (NWS)	Webster, Texas

- The STP radiological emergency preparedness exercise objectives are based on NRC requirements provided in 10 CFR 50.47, Emergency Plans, and 10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities. Additional guidance provided in NUREG-0654/FEMA-REP-1, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, was utilized in developing the objectives.
- Risk Significant Planning Standards (RSPS) (i.e., 10 CFR 50.47(b)(4), Emergency Classification; 10 CFR 50.47(b)(5), Notification; 10 CFR 50.47(b)(9), dose assessment; and 10 CFR 50.47(b)(10), Protective Actions) will be evaluated.
- Exercise objectives D-1, E-2, and J-7 will be evaluated for performance indicators, in accordance with NEI 99-02, Regulatory Assessment Performance Indicator Guidelines.
- Key ERO member credit will be evaluated for the following positions - **Control Room:** Shift Manager, State/County Communicator; **Technical Support Center:** TSC Manager, Chemical/Radiochemical Manager, Assistant Operations Manager, Technical Manager, Radiological Manager; **Operations Support Center:** OSC Coordinator; **Emergency Operations Facility:** EOF Director, Engineering Assistant, Radiological Director.
- This scenario meets the requirements to demonstrate the capability to prepare a scenario that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. Drills/Exercises shall be conducted as set forth in NRC and FEMA rules and policy. Reference NUREG-0654, N.1.a.
- This scenario meets the requirements to demonstrate the capability to conduct drill/exercise including mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. Provide for a critique of the biannual exercise by Federal and State evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within the committed time period. NUREG-0654, N.1.b.
- This scenario meets the requirements to demonstrate the capability to conduct a communications drill/ exercise between STP, State and local emergency operations centers, and field assessment teams. Communication drills shall also include the aspect of understanding the content of messages. NUREG-0654, N.2.a.
- This scenario meets the requirements to demonstrate the capability to evaluate, and critique a drill/exercise. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal report should result from the critique. NUREG-0654, N.4.
- This scenario meets the requirements to demonstrate the capability to evaluate controller and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Issues will be documented in the Corrective Action Program. NUREG-0654, N.5.

FEMA REP EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

FEMA REP Sub-element 1.a – Mobilization

Criterion 1.a.1: Off-site Response Organizations (OROs) use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654/FEMA-REP-1, A.1.a, e; A.3, 4; C.1, 4, 6; D.4; E.1, 2; H.3, 4)

Locations:

- State Operations Center (SOC), Austin, TX
- Department of Public Safety (DPS) Disaster District Sub-2C Emergency Operations Center (EOC), Pierce, TX
- Department of State Health Services (DSHS) Radiation Control Program (RCP) Headquarters, Austin, TX
- DSHS RCP at South Texas Project (STP) Emergency Operations Facility (EOF), Bay City, TX
- Joint Information Center (JIC), Bay City, TX
- Matagorda County Emergency Operations Center (MCEOC), Bay City, TX (*See EMPG evaluation requirement below*)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COORDINATION (COORDINATION AND CONTROL)

Description: *Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.*

- **Activity 1: Activate EOC/MACC/IOF**
Definition: *In response to activation, perform incident notifications, recall of essential personnel, and stand-up of EOC/MACC/IOF systems to provide a fully staffed and operational EOC. (HSEEP Res.B1c 4, 4.3, 4.4)*
- **Activity 2: Gather and Provide Information**
Definition: *Upon establishing EOC/MACC/IOF operations, gather, organize, and document incident situation and resource information from all sources to maintain situational awareness within the EOC/MACC. (Res.B1C 5.1.1, 5.1, 5.2.2, 5.2.3, 5.1.2, 5.2, 5.2.4)*

Extent of Play:

- DSHS RCP personnel will pre-stage at the RCP staging area in Bay City.
- Regardless of the scenario, no facilities/activities will relocate during this exercise.
- DSHS Mobile Lab will be located at the staging area in Bay City but will not be evaluated.
- Non-TDEM players will be pre-staged at the SOC. DSHS will be deployed to SOC upon activation via a message inject.
- At Site Area or General Emergency, the SOC will notify agencies that comprise the Emergency Management Council. These notifications will be logged according to procedure; however, physical notifications will be simulated.
- Four (4) Field Monitoring Teams will be deployed for training purposes. Only (2) teams will be evaluated. Drill evaluators may be required to travel in separate vehicles due to space restrictions in DPS vehicles.
- Disaster District Committee personnel not stationed at DD Sub-2C EOC may be pre-staged.
- To allow for maximum amount of play, DSHS-RCP and DSHS-JIC staff will pre-stage in the area.
- An extra dispatcher will be placed on duty at the Matagorda County Sheriff's office, in Bay City, to handle the regular workload.
- Non-local TDEM personnel will be pre-staged in the area.

ARCAs: None

FEMA REP Sub-element 1.b - Facilities

Criterion 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654/FEMA-REP-1, H.3; G.3.a; J.10.h; J.12; K.5.b)

Locations:

- Department of Public Safety (DPS) Disaster District Sub-2C Emergency Operations Center (EOC), Pierce, TX
- Department of State Health Services (DSHS) Radiation Control Program (RCP) Headquarters, Austin, TX

Extent of Play:

- None

ARCAs: None

FEMA REP 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/FEMA-REP-1, A.1.d; A. 2.a, b; A.3; C.4, 6)

Locations:

- SOC
- DDC
- DSHS RCP Headquarters
- DSHS RCP at STP EOF
- MCEOC (*See EMPG evaluation requirement below*)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COORDINATION (COORDINATION AND CONTROL)

Description: *Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.*

- **Activity 1: Direct Emergency Operation Center's Tactical Operations**
Definition: *In response to notification of incident, activate, staff, and organize the EOC/MACC/IOF in accordance with emergency plans and standard operating procedures; plan, direct, and coordinate information and activities internally within EOC/MACC/IOF functions, and externally with other multi-agency coordination entities and the public information system; coordinate logistical support to maintain an operationally functioning EOC/MACC/IOF until deactivation. (HSEEP Res.B1c 3.1, 3.1.1, 3.3.1, 3.3.3)*

Extent of Play: None

ARCAs: None

FEMA REP 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/FEMA-REP-1, F.1, 2)

Locations:

- SOC
- DDC
- DSHS RCP Headquarters
- DSHS RCP at STP EOF
- DSHS RCP Field Monitoring Teams (FMTs)
- JIC
- MCEOC (See EMPG evaluation requirement below)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COMMUNICATIONS

Description: *Ensure the capacity for timely communications in support of security, situational awareness, and operations by any and all means available, among and between affected communities in the impact area and all response forces.*

- **Activity 1: Alert and Dispatch**
Definition: *In response to an alert, make notification and provide communications management until the Incident Command (IC), Emergency Operations Center (EOC), and Emergency Management Agency (EMA) are stood-up (HSEEP ComC 4.2, 4.2.1, 4.2.1.1, 3.5, 4.2.3, 4.1.1)*
- **Activity 2: Provide Emergency Operations Center Communications Support**
Definition: *Upon notification, initiate interoperable system operations, in addition to maintaining, managing, and assuring protection of the interoperable communications systems until the EOC is ordered deactivated. (HSEEP ComC 5.3, 5.3.3, 4.1.1, 5.3.1.3)*

Extent of Play:

- A controller phone cell will be established to ensure appropriate communications are accomplished and to ensure fluid exercise play.
- Correction on the spot requested, for local agencies.*

ARCA: None

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

Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654/FEMA-REP-1, H.7, 10; I.7, 8, 9; J. 10.a, b, e; J.11, 12; K.3.a; K.5.b)

Locations:

- SOC
- DDC
- DSHS RCP Headquarters
- DSHS RCP at STP EOF
- DSHS RCP Field Monitoring Team (FMTs)
- JIC
- MCEOC (See EMPG evaluation requirement below)

FEMA HSEEP CORE CAPABILITY: ENVIRONMENTAL RESPONSE/HEALTH AND SAFETY

Description: *Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities.*

- **Activity 1: Identify Safety/PPE Needs and Distribute PPE**
Definition: *Upon appointment as Safety Officer, assess safety and health hazards, inform IC of needs, and develop site-specific safety and health plan. (HSEEP Res.B1b 5.4.1, 5.2)*

Extent of Play:

- Donning and doffing of anti-contamination clothing will be demonstrated out of sequence by one player, and will not be worn during the exercise.
- Activated charcoal filters will be used in lieu of silver zeolite filters for exercise purposes but FMTs will demonstrate availability of silver zeolite filters.
- Field Monitoring Team Equipment not required to demonstrate exercise objectives may be left at the DSHS Staging Area to allow for additional space within the vehicles.
- Correction on the spot requested, for purposes of dressing out and for local agencies.*

ARCAs: None

FEMA REP EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

FEMA REP 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 insure 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/FEMA-REP-1, C.6; J. 10.e, f; K.4)

Locations:

- DSHS RCP at STP EOF
- MCEOC (See EMPG evaluation requirement below)

FEMA HSEEP CORE CAPABILITY: (1) ENVIRONMENTAL RESPONSE/HEALTH AND SAFETY

Description: *Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities.*

- **Activity 1: Ongoing Monitoring of Responder Safety and Health**
Definition: *Upon assignment of responders to the incident, maintain continuous monitoring of responder safety and health, proper functioning of PPE and equipment, and awareness of on-site hazards; oversee decontamination; document all actions and injuries/illnesses; and provide for emergency and psychological medical care (HSEEP Res.B1b 7.1.1, 7.4.3, 7.4.4, 7.5.2, 7.5)*

Extent of Play:

- Ingestion of KI will be simulated during the exercise.

ARCAs: None

FEMA REP 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 (PARs) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions. (NUREG-0654/FEMA-REP-1, I.10; Supp.3)

Locations:

- DSHS RCP Headquarters or
- DSHS RCP at STP EOF

Extent of Play:

- If STP EOF has been staffed by DSHS RCP at this time, it will be the only facility evaluated for this criterion.

ARCA's: None

FEMA REP 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. (NUREG-0654/FEMA-REP-1, A.3; C.4, 6; D.4; J.9; J.10.f, m)

Locations:

- MCEOC (*See EMPG evaluation requirement below*)

FEMA HSEEP CORE CAPABILITY: MASS CARE SERVICES

Description: *Provide life-sustaining and human services to the affected population, to include hydration, feeding, sheltering, temporary housing, evacuee support, reunification, and distribution of emergency supplies.*

- **Activity 1: Direct Evacuation and/or In-Place Protection Tactical Operations**
Definition: *In response to a hazardous condition for a locality, direct, manage, and coordinate evacuation and/or in-place sheltering procedures for both the general population and those requiring evacuation assistance throughout incident. (HSEEP Res.B3a 3.1.2, 3.2.1, 3.2, 3.4.4, 3.3, 3.3.2, 3.4.2)*
- **Activity 2: Activate Evacuation and/or In-Place Protection**
Definition: *In response to activation, identify and ensure notification of at-risk populations, and identify populations requiring assistance in evacuation and/or in-place protection. (HSEEP Res.B3a 4.2.1, 4.2.3, 4.2.4)*

Extent of Play:

- The protective actions that result from this decision-making process will not be implemented. No members of the public will be relocated.

ARCA's: None

FEMA REP 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 groups of persons with disabilities and access/functional needs. (NUREG-0654/FEMA-REP-1, D.4; J.9; J.10.d, e)

Locations:

- MCEOC (*See EMPG evaluation requirement below*)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COORDINATION (COORDINATION AND CONTROL)

Description: *Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.*

- **Activity 1: Provide EOC/MACC/IOF Connectivity**
Definition: *Upon identification of issues, establish priorities between Incident and/or Area*

Commands; provide strategic direction; coordinate and resolve multi-agency policy issues, including the issuance of protective action recommendations and protective action decisions. (HSEEP Res.B1c 7.3.4, 7.3.1, 7.3.2, 7.3.3, 7.4)

FEMA HSEEP CORE CAPABILITY: MASS CARE SERVICES

Description: *Provide life-sustaining and human services to the affected population, to include hydration, feeding, sheltering, temporary housing, evacuee support, reunification, and distribution of emergency supplies.*

- **Activity 1: Direct Evacuation and/or In-Place Protection Tactical Operations**
Definition: *In response to a hazardous condition for a locality, direct, manage, and coordinate evacuation and/or in-place sheltering procedures for both the general population and those requiring evacuation assistance throughout incident. (HSEEP Res.B3a 3.5.3, 3.5.4)*
- **Activity 2: Activate Evacuation and/or In-Place Protection**
Definition: *In response to activation, identify and ensure notification of at-risk populations, and identify populations requiring assistance in evacuation and/or in-place protection. (HSEEP Res.B3a 4.4.1, 4.4.2, 4.4.3)*

Extent of Play:

- Protective actions for access/functional needs individuals will be considered at the MCEOC; however, actual demonstration of protective actions will not be performed.
- MCEOC staff will demonstrate this criterion through discussion and showing the evaluator a roster of access/functional needs individuals in the 10-mile emergency planning zone.
- Should a County PAD include ingestion of KI for Special Populations, this will be accomplished via message inject or, if dose projections do not reach 5R for those populations, it will be accomplished via interview.

ARCAs: None

FEMA REP EVALUATION AREA 3: PROTECTIVE ACTION IMPLEMENTATION

FEMA REP 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/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers. (NUREG-0654/FEMA-REP-1, J.10.e; K.3.a, b; K.4)

Locations:

- DSHS RCP at STP EOF
- DSHS RCP Field Monitoring Teams
- MCEOC (See EMPG evaluation requirement below)

FEMA HSEEP CORE CAPABILITY: ENVIRONMENTAL RESPONSE/HEALTH AND SAFETY

Description: *Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities.*

- **Activity 1: Site/Incident Specific Safety and Health Training**
Definition: *Site/Incident specific training provides necessary understanding of the hazards identified and assessed in the incident, and the necessary precautions. Site/Incident specific training builds upon pre-incident training, but tailors curriculum to the tasks/hazards of the incident. Site/Incident specific training*

should reflect policies and procedures specified in the incident specific health and safety plan. Site/Incident specific training needs to have a flexible approach (training may need to be conducted outside of a classroom setting) and should be conducted prior to commencing response activities. (HSEEP Res.B1b 6.1, 6.2, 6.3)

Extent of Play:

- Exercise TLDs will be used for the exercise. TLDs for real events are packaged in the Emergency Planner box at the staging area. DSHS Emergency Planners can show evaluator real TLDs at staging area.
- Correction on the spot requested.*

ARCAs: None

FEMA REP Sub-element 3.b - Implementation of KI Decision

Criterion 3.b.1: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals is maintained. (NUREG-0654, E.7., J.10.e, f.)

Locations:

- MCEOC (See EMPG evaluation requirement below)

FEMA HSEEP CORE CAPABILITY: ENVIRONMENTAL RESPONSE/HEALTH AND SAFETY

Description: *Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities.*

- **Activity 1: Ongoing Monitoring of Responder Safety and Health**
Definition: *Upon assignment of responders to the incident, maintain continuous monitoring of responder safety and health, proper functioning of PPE and equipment, and awareness of on-site hazards; oversee decontamination; document all actions and injuries/illnesses; and provide for emergency and psychological medical care. (HSEEP Res.B1b 7.1.1, 7.4.4, 7.5, 7.5.5, 7.4.1)*

Extent of Play:

- The State of Texas does not provide KI to the general public.
- The Matagorda County EOC Command and Control Team will discuss issuance of KI.
- There are no institutionalized individuals within the 10-mile EPZ.
- If the decision is made to have emergency workers ingest KI, actual ingestion of KI will not be done.
- Distribution and actual ingestion of KI to emergency workers will be simulated by using copies of the Patient Packet insert or copies of the packet to represent actual KI supplies.
- Correction on the spot requested.*

ARCAs: None

FEMA REP Sub-Element 3.c - Implementation of Protective Actions for persons with disabilities and access/functional needs

Criterion 3.c.1: PADs are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions. (NUREG-0654, E.7., J.9., 10.c.d.e.g.)

Locations:

- MCEOC

Extent of Play:

- Contact with facilities/individuals will be simulated.
- Coordination with transportation providers will be demonstrated.
- Protective actions for functional needs individuals will be considered at the MCEOC, however, actual demonstration of protective actions will not be performed.
- Contact with mobility impaired and transportation dependent will be simulated.
- There are no special facilities in the 10-mile EPZ.
- Correction on the spot* is requested.

ARCAs: None

FEMA REP Sub-Element 3.c - Implementation of Protective Actions for Special Populations

Criterion 3.c.2 - OROs/School officials implement protective actions for schools.

Locations:

- MCEOC
- Matagorda School

Extent of Play:

- A bus driver interview will take place during the evaluated exercise. The demonstration will occur out of sequence of the exercise scenario, but during the exercise, at time agreed upon by the MCEOC controller and FEMA evaluator.
- The FEMA Evaluator and MCEOC Controller will conduct an interview with the Matagorda School Superintendent out of sequence of the exercise.
- Correction on the spot requested.*

ARCAs: None

FEMA REP 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/FEMA-REP-1, A.3; C.1, 4; J.10.g, j)

Locations:

- MCEOC (See EMPG evaluation requirements below)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COORDINATION (COORDINATION AND CONTROL)

Description: Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.

- **Activity: Direct Evacuation and/or In-Place Protection Tactical Operations**
Definition: *In response to a hazardous condition for a locality, direct, manage, and coordinate evacuation and/or in-place sheltering procedures for both the general population and those requiring evacuation assistance throughout incident. (HSEEP Res.B3a 3.3.1, Res.B3a 5.2, 5.2.1)*

Extent of Play

- Decision-making process will be demonstrated in real-time sequence; however, travel to the T/ACP will be simulated.
- A Law Enforcement Officer (from the Sheriff's Department) assigned to T/ACP will discuss the knowledge of their role and responsibilities by interview with the evaluator.

- This interview can occur out of sequence of the exercise scenario, but during the exercise, at a time agreed up on by the MCEOC controller and FEMA evaluator.
- Correction on the spot requested.*

ARCA's: None

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

Criterion 3.d.2: Impediments to evacuation are identified and resolved. (NUREG-0654/FEMA-REP-1, J.10.k)

Locations:

- MCEOC (See EMPG evaluation requirements below)

FEMA HSEEP CORE CAPABILITY: OPERATIONAL COORDINATION (COORDINATION AND CONTROL)

Description: *Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.*

- **Activity: Identify and Address Issues**
Definition: *Upon receiving information, assess and identify current and anticipated resource shortages, technical support issues, and key policy decisions needed across all capabilities, and provide to the applicable agency, function, jurisdiction or multi-agency coordination entity for resolution. (HSEEP Res.B1c 6.1.4, 6.1.5, 6.3)*

FEMA HSEEP CORE CAPABILITY: MASS CARE SERVICES (Evacuation)

Description: *Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.*

- **Activity: Direct Evacuation and/or In-Place Protection Tactical Operations**
Definition: *In response to a hazardous condition for a locality, direct, manage, and coordinate evacuation and/or in-place sheltering procedures for both the general population and those requiring evacuation assistance throughout incident (HSEEP Res.B3a 3.3.1)*

Extent of Play:

- This criterion will be demonstrated by inject.
- No impediment will actually occur, however, the situation and solution will be discussed in the MCEOC.
- A controller inject may be used to initiate the demonstration for this Criterion. The inject will occur during an evacuation requiring re-routing of traffic and coordination with the Joint Information Center for dissemination to the evacuating public.

ARCA's: None

FEMA REP EVALUATION AREA 4: FIELD MEASUREMENT AND ANALYSIS

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

Criterion 4.a.2: Field teams (2 or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654/FEMA-REP-1, C.1; H.12; I.7, 8, 11; J.10.a)

Locations:

- DSHS RCP at STP EOF

Extent of Play: None

ARCA's: None

FEMA REP 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 should 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 sample media. (NUREG-0654/FEMA-REP-1, C.1; H.12; I.8, 9; J.10.a)

Locations:

- DSHS RCP FMTs

Extent of Play:

- Activated charcoal filters will be used in lieu of Silver Zeolite filters for exercise purposes.
- Each graded field team will at least once demonstrate proficiency in the use of PPE (gloves & booties) as required by procedure. Due to heat considerations, suits will not be worn in the field.
- The ability to don and remove anti-contamination clothing will be demonstrated by 1 field team member at an agreed upon time and location prior to or following the exercise.
- Correction on the spot requested.*

ARCA's: None

FEMA REP EVALUATION AREA 5: EMERGENCY NOTIFICATION & PUBLIC INFORMATION

FEMA REP 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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance. (NUREG-0654/FEMA-REP-1, E.5, 6, 7)

Locations:

- NOAA, National Weather Service (NWS)
- MCEOC (See EMPG evaluation requirements below)

FEMA HSEEP CORE CAPABILITY: PUBLIC INFORMATION AND WARNING

Description: *Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard, as well as the actions being taken and the assistance being made available, as appropriate.*

- Activity: Issue Public Information, Alerts/Warnings, and Notifications

Definition: *Issue public information, alerts, warnings, and notifications through established systems to the public, coordinating officials, and incident managers and responders. (HSEEP Res.B1f 5.1, 5.2, 5.2.5, 4.3, 5.3, 5.2.1, 5.2.4)*

Extent of Play:

- Siren activation will be simulated by the Matagorda County Sheriff's Office Dispatcher; and alert radio activation will be simulated by the National Weather Service (NWS) in Dickinson.
- Simulation of the siren and alert radio activation will be in real time sequence with the transmission of the EAS message. The sirens will be sounded at the appropriate time in the exercise in accordance with the decision and the EAS message will follow the siren sounding.
- Emergency Alert System (EAS) message content will be determined by the Emergency Management Director and communicated to the EAS source by the EOC Administrative Assistant; however, broadcasts will be simulated.

ARCAs: None

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

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

Locations:

- JIC
- MCEOC (See EMPG evaluation requirements below)
- NOAA, National Weather Service (NWS)

FEMA HSEEP CORE CAPABILITY: PUBLIC INFORMATION AND WARNING

Description: *Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard, as well as the actions being taken and the assistance being made available, as appropriate.*

- **Activity:** Establish Joint Information Center
Definition: *Activate and implement a Joint Information Center (JIC) and disseminate information to public. (HSEEP Res.B1f 5.1.1, 6.1, 3.2.2, 6.2, 6.2.2, 6.2.1)*
- **Activity:** Conduct Joint Information Center Operations
Definition: *Upon activation of the JIC, monitor media and conduct press briefings. (HSEEP Res.B1f 7.1.4, 7.1.2, 7.2.6.1, 7.2.8)*
- **Activity:** Issue Public Information, Alerts/Warnings, and Notifications
Definition: *Issue public information, alerts, warnings, and notifications through established systems to the public, coordinating officials, and incident managers and responders. (HSEEP Res.B1f 5.1, 5.2.5, 5.5.2)*

Extent of Play:

- Information will not be provided to the public and/or the media not participating in the exercise.
- The STP JIC will be utilizing the PIER (Public Information Emergency Response) system to push, pull, and track public information. PIER is a private tool used by STP only. This system will not be evaluated by FEMA.

ARCAs: None

GENERAL Extent of Play:

1. With regard to last minute additions or changes to any previously approved Extent-of-Play, all suggested changes, including decisions due to inclement weather, must be forwarded to the RAC Chair for approval.
2. As a statement of fact, no ORO will deliberately deviate from its plans and procedures with the intent of avoiding responsibility.
3. The exercise may be suspended or terminated due to a real emergency situation.
4. *Correction-on-the-spot is defined in the FEMA REP Program Manual at III-21.

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