



### RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) REQUEST

2017-0392

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RESPONSE TYPE  INTERIM  FINAL

**REQUESTER:**

Julian Tarver

**DATE:**

07/05/2017

**DESCRIPTION OF REQUESTED RECORDS:**

Record called "Status of emergency preparedness activities in the post 9/11 threat environment, dated Oct 2005"

#### PART I. -- INFORMATION RELEASED

You have the right to seek assistance from the NRC's FOIA Public Liaison. Contact information for the NRC's FOIA Public Liaison is available at <https://www.nrc.gov/reading-rm/foia/contact-foia.html>

- Agency records subject to the request are already available on the Public NRC Website, in Public ADAMS or on microfiche in the NRC Public Document Room.
- Agency records subject to the request are enclosed.
- Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
- We are continuing to process your request.
- See Comments.

#### PART I.A -- FEES

#### NO FEES

AMOUNT\*  
**\$0.00**

\*See Comments for details

- You will be billed by NRC for the amount listed.
- You will receive a refund for the amount listed.
- Fees waived.

- Minimum fee threshold not met.
- Due to our delayed response, you will not be charged fees.

#### PART I.B -- INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- We did not locate any agency records responsive to your request. *Note:* Agencies may treat three discrete categories of law enforcement and national security records as not subject to the FOIA ("exclusions"), 5 U.S.C. 552(c). This is a standard notification given to all requesters; it should not be taken to mean that any excluded records do, or do not, exist.
- We have withheld certain information pursuant to the FOIA exemptions described, and for the reasons stated, in Part II.
- Because this is an interim response to your request, you may not appeal at this time. We will notify you of your right to appeal any of the responses we have issued in response to your request when we issue our final determination.
- You may appeal this final determination within 90 calendar days of the date of this response by sending a letter or e-mail to the FOIA Officer, at U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001, or [FOIA.Resource@nrc.gov](mailto:FOIA.Resource@nrc.gov). Please be sure to include on your letter or email that it is a "FOIA Appeal." You have the right to seek dispute resolution services from the NRC's Public Liaison, or the Office of Government Information Services (OGIS). Contact information for OGIS is available at <https://ogis.archives.gov/about-ogis/contact-information.htm>

#### PART I.C COMMENTS ( Use attached Comments continuation page if required)

The responsive record to your request is SECY-05-0189. SECY-05-0189 and its two attachments are released in their entirety and are enclosed with this response.

Signature - Freedom of Information Act Officer or Designee

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**POLICY ISSUE**  
(Information)

October 19, 2005

SECY-05-0189

FOR: The Commissioners

FROM: Luis A. Reyes  
Executive Director for Operations /RA/

SUBJECT: STATUS OF EMERGENCY PREPAREDNESS ACTIVITIES  
IN THE POST-9/11 THREAT ENVIRONMENT

PURPOSE:

The purpose of this paper is to provide the Commission with a semiannual report on the status of important activities in the area of emergency preparedness (EP) and enhancements to nuclear power plant licensees' EP programs.

SUMMARY:

In Commission staff requirements memorandum (SRM) dated May 4, 2005, the staff was directed to provide the Commission with a semiannual report on important activities in the area of EP, and to include a progress report on the complete review of EP requirements and guidance in the post-9/11 threat environment. The staff was also directed to report the status of licensee responses to NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events", inform the Commission of any impediments, and report completion of licensees' actions.

CONTACT: Michael B. Norris, NSIR/DPR/EPD  
301-415-4098

Attachment 1 contains "Official Use Only information." Upon separation of Attachment 1, this paper and Attachment 2 are DECONTROLLED.

<p><b>OFFICIAL USE ONLY</b></p> <p>May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)</p> <p>Exemption number: <u>2</u></p> <p>Nuclear Regulatory Commission review required before public release.</p> <p><u>Michael B. Norris - NSIR/DPR/EPD</u></p> <p>Name and organization of person making determination:</p>
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DISCUSSION:

Based on the Commission's direction, the staff is providing the following status update on nine (9) EP initiatives. Additional details are described in the attachment(s) to this document.

While the 9 initiatives described below are important EP activities, they do not encompass all of the important activities in the EP area. For example, the staff is continuing to perform licensing activities including, reviews of emergency plan change submittals for current licensees, reviews of early site permits, and development of licensing infrastructure for advanced reactors. The staff continues to support the Department of Homeland Security (DHS) comprehensive review of nuclear power plants (NPPs), licensee biennial exercises, and force-on-force (FOF) inspections. The staff is also currently working with the Department of Health and Human Services (HHS) and DHS on potassium iodide (KI) distribution initiatives. This paper focused on those preparedness initiatives of greatest significance during the next 6 months. In subsequent reports, the staff plans to transmit updated bullets by memorandum consistent with Commission guidance to adopt a "least cost" approach. Attachment 1 provides additional information.

Initiative 1: NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events"

The staff issued Bulletin 2005-02 to NPP licensees requesting information on five (5) areas of their EP program capabilities. The staff asked that this information be submitted as written statements signed under oath and affirmation to ensure the information is reliable and to preclude the need for validation through special inspections. The Bulletin issued on July 18, 2005, provided information for licensees to discuss provisions in place or planned to address the information in the Bulletin. Licensee responses in those areas have been received and are summarized as follows:

<b>Emergency Action Levels*</b>	<b>NRC Notification</b>	<b>Onsite protective actions</b>	<b>Emergency Response Organization Augmentation</b>	<b>EP-Security Integrated Drill and Exercise Program</b>
63 licensees ~ 180 days to implement	1 licensee Complete	4 licensees Complete	29 licensees Complete	9 licensees ~180 days to implement
1 licensee ~ 210 days to implement	9 licensees ~ 60 days to implement	1 licensees ~ 60 days to implement	34 licensees ~ 180 days to implement	55 licensees - awaiting NRC/DHS endorsement
	54 licensees ~ 90 days to implement	58 licensees ~180 days to implement	1 licensee ~ 210 days to implement	
		1 licensee ~ 210 days to implement		

\* Implementation dates start Bulletin issuance date of July 18, 2005.

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The staff analyzed the responses and in general, the recommended enhancements described in Bulletin 2005-02 will be adopted by licensees with the following exception:

- EP-Security Integrated Drill and Exercise Program
  - Fifty-five sites indicated that adoption of these enhancements is contingent on NRC/DHS endorsement of the new evaluation process.

The staff has initiated discussions with DHS on the development and endorsement of the new evaluation process for the drill and exercise program.

Initiative 2: Development and implementation of a security-based drill program

In Bulletin 2005-02, the NRC requested information on whether the industry intended to integrate security-based scenarios into routine NPP drill and exercise programs. The Nuclear Energy Institute (NEI) convened a working group in late 2004. The group has made considerable progress in organizing the implementation of a security-based drill and exercise program. The industry, with staff oversight, is currently working on the integration and demonstration of emergency responses to terrorist events, including preparation and conduct of integrated drills exercising the emergency response organization's (ERO's) response to a range of terrorist events. The staff expects the licensees to enhance key skills and capabilities through drilling on the response to security events.

A successful tabletop drill was conducted at Diablo Canyon on July 13, 2005, and another tabletop is scheduled for November 7, 2005, at Duane Arnold. The Diablo Canyon drill was effective at identifying lessons learned, and the staff expects that future exercises will be beneficial in identifying both site-specific and generic issues. The staff provided feedback to Diablo Canyon personnel and industry observers during the July drill. As a result, NEI is making changes to the drill guidelines. The next phase is to perform NRC observed, non-evaluated pilot drills at all sites within 3 years. The staff notes that the first such drill is scheduled for March 1, 2006, at Callaway. The staff intends to observe these drills to ensure the pilot drill program results in appropriate changes to routine drill and exercise scenarios. The response to Bulletin 2005-02 indicates that most licensees desire DHS endorsement of the program before they will commit to implementing it.

The staff is currently working with DHS to develop exercise objectives which will address the response differences from the traditional radiological event drills and is working to obtain DHS endorsement prior to program implementation.

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Initiative 3: Review of EP regulations and guidance for commercial nuclear power plants

The staff conducted a successful and well attended public meeting on August 31 and September 1, 2005. The purpose of the meeting was to obtain stakeholder input on selected topics related to the review of EP regulations and guidance in the post-9/11 threat environment for NPPs. The meeting was conducted as a roundtable discussion among participants who were invited to represent the spectrum of interests in the area of EP. The spectrum included representatives from State, local, and Tribal governments; DHS; NRC; advocacy groups; and the nuclear industry. A list of the roundtable participants and the agenda are provided in Attachment 2. The stakeholders raised issues on the following topic discussions:

- Abbreviated notification to the NRC and the offsite response organizations (OROs), and the timing, sequencing, and technological means of the notifications
- EP/security integrated drill and exercise program
- Offsite protective actions, specifically the distinction between "sheltering" and broadcast monitoring, often referred to as "heightened awareness"
- Licensee protective action recommendations (PARs) for security events during a Site Area Emergency
- Backup power to siren systems

The staff is now analyzing comments from the meeting, and will provide a comment summary and analysis on the NRC website by January 17, 2006 (90 days after the close of the public comment period). The meeting transcripts are currently posted on the NRC public website. The next semiannual status report will provide a summary of the comment analysis, general comments and themes from the meeting.

Initiative 4: EP outreach

The staff outreach team has been working on initiatives to improve outreach in the areas of EP and incident response with both internal and external stakeholders. In early 2005, the outreach team began a dialogue with internal NRC stakeholders (OSTP, the regions, NRR, and EDO Communication Council) to develop and implement plans for enhancements to the agency's EP and incident response outreach efforts. Over the last year, DPR has conducted 64 outreach activities with State, local and Tribal governments, professional societies, other Federal government agencies, members of the public, and the nuclear industry.

The staff has met with international representatives from Brazil, Ukraine, Belgium, Indonesia, China, the United Kingdom and Japan to discuss EP in the post-9/11 threat environment. The staff observed a terrorist-based radiological exercise in Finland, February 2005. The staff participated in international EP forums, committees and meetings, as well as served as members of the International Atomic Energy Agency (IAEA) Operational Safety Review Team (OSART) in Russia and China.

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Upon request, regional EP staffs outreach with State(s) and locals prior to exercises and for meetings with regional utility groups. Additionally, regions have conducted tabletop drills, including training, with Federal, State, and local government representatives and with utility groups.

In April 2005, the staff made presentations on several topics, including post-9/11 initiatives, at the National Radiological Emergency Preparedness Conference. This conference also included two joint presentations by NRC and the Chief of Natural and Technological Hazards Branch, DHS. The staff captured an extensive number of questions and comments raised by stakeholders at the conference and issued those in a publicly available document on the NRC external website. The staff also successfully engaged DHS to provide answers appropriate to subjects related to that agency.

The outreach team is part of the EDO Communication Council and is providing expertise in areas related to EP. In September 2005, the team met with regional management, as well as representatives from OSTP and NRR, to discuss the coordination of agency-wide resources in performing EP outreach activities. This meeting enabled headquarters and regional staff responsible for outreach to discuss activities performed by their respective division staffs. The attendees discussed best practices, challenges, and desired paths forward in outreach for EP and incident response. The staff's efforts for the review of EP regulations and guidance in the post-9/11 environment included extensive stakeholder outreach, including Federal, State, local, Tribal and advocacy groups.

The outreach team is currently addressing initiatives previously recommended to the Commission in April 2005. Additionally, the staff is aggressively coordinating with DHS to ensure a common understanding of EP issues and is appropriately involving DHS in areas where joint responsibilities exist.

Initiative 5: Review of licensee responses on the EP aspects of NRC advisories and the NRC's February 25, 2002, Order.

The staff reviewed licensees' responses and found that licensees generally adopted the EP guidance presented in the NRC advisories. However, there were some deviations in specific areas, which are described in Attachment 1. The staff attributed the deviations to the licensees' need for further information, which was subsequently provided in Bulletin 2005-02.

The staff is supporting the ongoing effort to review licensee responses describing their plans and schedules for addressing the staff's guidance on complying with the February 2002 Order for interim safeguards and security compensatory measures. The staff will brief the Commission on the results of this review at a later date.

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Initiative 6: Transition of the oversight for the EP component of force-on-force exercises to the regional offices.

Following September 11, 2001, NRC force-on-force (FOF) exercise activities were suspended because the conduct of such exercises would have been a significant distraction to licensee security forces that were already at the highest level of alert. In 2003, the NRC conducted a pilot program which evaluated the effects of the interim compensatory measures that were required by NRC's orders, expanded adversary characteristics, and the integration of the operations-EP-security interface. In 2004, the NRC conducted a transitional FOF exercise program during which the inspection processes were refined and the licensees completed physical protection enhancements and implemented their revised security plans. In November 2004, the NRC began conducting evaluated FOF inspections. EP staff participate as part of the inspection team to evaluate licensee response to simulated security events.

In 2005, the staff shifted the lead for EP inspection from headquarters to the regional offices. This transition will provide the following benefits:

- Integrates the FOF exercises into the EP inspection program
- Reduces the cost of travel to support the exercises
- Raises the regional inspectors' level of awareness of EP procedures in response to terrorist events

The staff has developed a draft inspection procedure for the transition of the oversight for the EP component of the FOF exercises to the regional offices. This procedure has been piloted at an FOF exercise using the resident inspectors and seeking their feedback. The draft procedure was provided to the regions for their review and comment. The current goal is to complete the transition to the regional offices by the end of calendar year 2005.

Initiative 7: Progress of alert and notification system related activities

DHS advises the NRC on the status of offsite emergency planning, including the acceptability of the alert and notification system (ANS). DHS bases its finding of acceptability on the licensee's ANS design report and FEMA-REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants." The NRC relies on DHS's assessment of the licensee commitments in the facility ANS design report in finding that planning standard 10 CFR 50.47(b)(5) has been met. The staff is partnering with DHS in the development of updated regulatory guidance applicable to current siren technology.

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On August 8, 2005, the Energy Policy Act of 2005 (Act) was signed into law. Section 651(b) of the Act states that:

for any licensed nuclear power plants located where there is a permanent population, as determined by the 2000 decennial census, in excess of 15,000,000 within a 50-mile radius of the power plant, not later than 18 months after enactment of this Act, the Commission shall require that backup power to be available for the emergency notification system of the power plant, including the emergency siren warning system, if the alternating current supply within the 10-mile emergency planning zone of the power plant is lost.

The Indian Point nuclear power plant located in Buchanan, New York, is the only plant affected by the Act. In response to the Act, and in light of recent siren testing and equipment problems associated with the Indian Point ANS, the staff is requesting the licensee to explain its corrective action plans, and develop appropriate and prompt improvement oversight strategies. The staff plans to impose the requirements by using a confirmatory order in compliance with the Act before the end of January 2006.

Initiative 8: Coordination of EP activities with DHS

DHS has initiated a re-alignment of functions of the Federal Emergency Management Agency (FEMA) and other DHS components. NRC staff has continued to maintain awareness of DHS re-organization activities and continues to coordinate with DHS to obtain input for agency deliverables which necessitate joint discussion and endorsement. This includes actions related to the Energy Policy Act of 2005 requirements discussed in Initiative 7, for revisions to the current Memorandum of Understanding (MOU) between NRC and DHS as a result of organizational changes, for the petition for rulemaking for 10 CFR Part 50 to require offsite emergency plan inclusion of nursery schools and day care centers, and DHS endorsement to revisions in emergency exercise program evaluation guidance.

As discussed in Initiatives 1 and 2, a majority of licensees responding to Bulletin 2005-02 indicated that adoption of security-based enhancements to the emergency preparedness drill and exercise program is contingent on NRC/DHS endorsement of the new evaluation process. NRC and DHS staff have engaged on a plan to address the evaluation criteria revisions which include NRC/DHS participation in licensee pilot drills to better understand evaluation opportunities resulting from the unique aspects of security-based drill scenarios.

The staff continues to work with DHS to ensure that regulatory action milestones remain on schedule, specifically, prospective early site permits and combined licenses, and the associated regulatory infrastructure (i.e., rulemaking, NRC/DHS joint guidance development, and preparation for inspection of implemented EP programs). Recent impacts on DHS resources

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due to natural disaster recovery efforts have prompted additional interactions between DHS and NRC management to discuss priorities. The staff will continue to work with DHS to ensure EP issues are appropriately prioritized.

Initiative 9: Hurricanes Katrina and Rita Lessons Learned

After the 2004 hurricane season, NRC HQ and Region II identified the need to clarify internal and external agency interaction during the EP review for plant restart. Subsequently, the staff reviewed the FEMA/NRC MOU and revised the NRC internal guidance (NRC Inspection Manual Chapter 1601, "Communication Protocol for Assessing Offsite Emergency Preparedness following a Natural Disaster") in July 2005. Manual Chapter 1601 was used for post-event restart decision making for Waterford 3, following Hurricane Katrina.

The staff is soliciting comments from NRC responders and the Agreement States regarding lessons learned from Hurricanes Katrina and Rita activities. Based on the comments received, identified lessons learned will be considered for improvement to incident response programs.

COORDINATION:

The Office of the General Counsel has no legal objection to this paper.

COMMITMENTS:

Listed below are actions or activities committed to by the staff in this paper:

- 1) In the next semiannual status report, provide a summary to the Commission of the comment analysis, general comments, and themes from the August 31, 2005 public meeting regarding EP regulations and guidance in the post-9/11 threat environment. This summary will be provided to the Commission no later than April 2006.
- 2) Brief the Commission on the review of licensee responses describing plans and schedules for addressing the staff's guidance on complying with EP aspects of the February 2002 Order for interim safeguards and security compensatory measures. This briefing will be provided to the Commission no later than December 2005 per commitment number W200500143.

*/RA/*

Luis A. Reyes  
Executive Director  
for Operations

Attachments: As stated (2)

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**Initiative 9: Hurricanes Katrina and Rita Lessons Learned**

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**/RA/**

Luis A. Reyes  
Executive Director  
for Operations

Attachments: As stated (2)

**DISTRIBUTION**

EDO Control (200500136 & 200500137)

Adams Package: ML052500216; Memo: ML052500205;  
Attachment 1 ML052500254 & Attachment 2 ML052500278 \* See previous concurrence

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**ADDITIONAL EMERGENCY PREPAREDNESS INFORMATION**

The following additional information is provided for the Commission's review. This information will provide a semiannual report on the status of important activities in the area of emergency preparedness.

Initiative 1: NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events"

Based on the insights derived to date from the September 11, 2001, terrorist attacks, the NRC has developed certain actions to strengthen licensee capability to respond to a terrorist attack. Licensees are responsible for the safe operation of their facilities. Moreover, licensees are ultimately responsible for developing prudent actions to be taken in response to an imminent or actual terrorist attack. To ensure an appropriate level of response in the unlikely event of an attack on a nuclear power plant (NPP), new emergency action levels (EALs) were developed for incorporation into existing emergency classification procedures. In addition, licensees were provided additional guidance for the evaluation of a modified notification process, onsite protective actions, and the drill and exercise programs. The staff issued Bulletin 2005-02 to NPP licensees to request information on five (5) aspects of their emergency preparedness (EP) programs:

- Enhancements to emergency classification level schemes
- NRC notifications
- Onsite protective measures
- Emergency response organization augmentation
- Drill and exercise program

<p align="center"><b>OFFICIAL USE ONLY</b></p> <p>May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)</p> <p>Exemption number: <u>2</u></p> <p>Nuclear Regulatory Commission review required before public release:</p> <p><u>Michael B. Norris - NSIR/DPR/EPD</u></p> <p>Name and organization of person making determination:</p> <p>Date of determination: <u>8/24/05</u></p>
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Attachment 1

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Responses in those areas have been received and are summarized as follows:

Emergency Action Levels	NRC Notification	Onsite protective actions	Emergency Response Organization Augmentation	EP-Security Integrated Drill and Exercise Program
63 licensees ~ 180 days to implement	1 licensee Complete	4 licensees Complete	29 licensees Complete	9 licensees ~180 days to implement
1 licensee ~ 210 days to implement	9 licensees ~ 60 days to implement	1 licensees ~ 60 days to implement	34 licensees ~ 180 days to implement	55 licensees - awaiting NRC/DHS endorsement
	54 licensees ~ 90 days to implement	58 licensees ~180 days to implement	1 licensee ~ 210 days to implement	
		1 licensee ~ 210 days to implement		

- Enhancements to emergency classification level schemes
  - All responses indicated that licensees will adopt the enhancements for their appropriate emergency classification schemes. This will be accomplished by January 20, 2006, in all cases except one licensee which will not do so until February 16, 2006, due to an outage.
- NRC notifications
  - All licensees state they will adopt the abbreviated notification to the NRC. This capability will be incorporated in notification procedures by October 18, 2005, in all cases.
- Onsite protective measures
  - All licensees state they will adopt the enhancements for their onsite protective measures.
- Emergency response organization (ERO) augmentation
  - All licensees state that they will incorporate enhancements consistent with the information provided in Bulletin 2005-02.
- Drill and exercise program
  - All licensees will adopt the drill and exercise program enhancements contingent on NRC and Department of Homeland Security (DHS) endorsement of the new evaluated exercise process program.

**Initiative 2: Development and implementation of a security-event-based drill program**

NPPs' security is robust and effective in protecting the public. In addition, based on NRC evaluations to date following 9/11, the emergency planning basis is valid. Licensees can and will implement protective measures to mitigate the effects of terrorist acts. These acts can not create a larger radioactive release or one that occurs more quickly than accidents already addressed by the EP planning basis. However, the condition of the plant after such an event is different from that routinely practiced in NPP drill and exercise programs. A properly prepared

ERO can effectively mitigate plant damage after a terrorist event. The staff and industry are in the process of ensuring that EROs routinely practice response to terrorism-based scenarios.

The Nuclear Energy Institute (NEI) Emergency Preparedness and Security Working Group is currently working with the staff on integrating and demonstrating emergency response to terrorist events, including preparation and conduct of integrated drills exercising a range of responses. The staff expects licensees to enhance key skills and capabilities through their drill programs. The industry is pursuing the integration of security events into the routine drill and exercise program as described in the NEI white paper dated May 2005 (ADAMS Accession No. ML051510380.) The end state of this process is for security events to be fully integrated into the drill and exercise program to the extent that one biennial exercise per 6-year period uses a security-based scenario.

However, there are some issues with respect to integration of security-based scenarios into NPP drill and exercise programs. The focus of EP/security exercises is different from routine radiological exercises in several ways:

- Integration of ERO, security, and operations response
- Coordination of notifications, offsite support, and plant ingress
- Recovery from the aftermath of a terrorist attack

The focus is not on response to a radiological release nor on protective-action decisionmaking and implementation. Those matters are adequately covered in routine radiological scenario based biennial exercises that have been practiced since 1980. This type of scenario will be implemented twice during the 6-year evaluated exercise period. A description of expected elements and sequence of EP/security exercises is provided below:

#### EP/Security Exercise Scenario Concept

The exercise begins at the site simulator with the normal shift staffing. The staff learns of security events through scenario messages and phone calls. Events progress through the attack on the plant and indication of damage.

The exercise includes the following elements:

- Immediate notification of the NRC
- Progressive declarations through at least a Site Area Emergency
- Onsite and offsite protective actions appropriate for the threat conditions and classification level (e.g., protecting a minimum contingent of operations and maintenance personnel for recovery)
- Notification of the offsite response organizations (OROs)
- Activation of the ERO (for armed attack scenarios, the use of the onsite emergency response facilities (ERFs) may not be possible, and the use of staging areas and alternative facilities would be demonstrated)
- Activation of the utility offsite ERFs and the State/local emergency operations centers (EOCs)

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- Initial site access communications with local law enforcement agencies (LLEAs)
- Site conditions that may prevent normal access and transit due to fire, locked doors, security measures, and areas of the site that have not yet been secured

The initial response portion of the exercise will take about 60 to 180 minutes. The exercise will then pause and go through a time jump.

The ERO will reconvene at the ERFs and be briefed on the status of the plant. This phase of the exercise will demonstrate coordination of offsite support and plant ingress during a terrorist event and the ERO's ability to recover from the aftermath of a terrorist attack including protection of the core, reactor vessel and containment. During this time jump, the terrorist event will have damaged the plant, either through an aircraft attack or armed attack (land, water, bomb) scenario. Sites will be expected to alternate scenarios for the exercises.

The ERO will be allowed to stage in response centers and will be briefed that the site has been attacked, and that the site's response centers had been declared safe for operation and activated (the EOF and the EOCs may have been in the process of activation during the initial exercise play). Responders are given information about the site and the status that they could have reasonably been expected to learn. Information will provide simulated conditions in the aftermath of the attack that are scenario specific (e.g., casualties, loss of equipment, loss of instrumentation, damage from large fires, explosions, and bullets, civil structure damage, rubblized areas, areas of the plant not yet secure). Responders may be told that a General Emergency has been declared and that initial protective actions have been implemented and are in progress or complete.

The exercise will include the following elements:

- ORO conduct of operations, including public protective actions, without the benefit of resources called to the site (fire for aircraft and law for armed attack)
- OROs' control of site ingress and egress
- Response to a significant number of personnel injuries and/or casualties
- A change to the existing protective actions based on plant or weather conditions
- Scenarios can be success oriented (i.e., the ERO may succeed in preventing core damage and/or a radiological release if the proper actions are taken)
  - The scenario must threaten core damage or other means for a potential radiological release (i.e., fuel pool event).
  - Aircraft scenarios should include coordination of large firefighting efforts and identification of plant mitigative actions.
- ERO diagnoses plant status, plans mitigative actions, executes mitigative actions and navigates plant recovery
  - The ERO mitigates site damage under the simulated conditions after an attack, either large fires or armed-attack-type damage, that might include areas of the site not yet secure.

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- Plant mitigative actions need not actually install and run equipment, but merely identify the existence of equipment needed to implement ad hoc measures and the equipment's availability and operability; means to use the equipment is also demonstrated (e.g., the expertise is on scene).

The post-event response portion of the exercise may take 3 to 4 hours, depending on how long it took to conduct the first portion, the objectives for the exercise, and how long it takes to effectively communicate response status after the simulated time jump. In any case, the exercise should be able to meet objectives in less than 7 to 8 hours total time.

The events that cause the conditions are secondary and need only to be explained as necessary for meaningful ERO response. There is no intention to simulate the defeat of the site security force or reveal targeting information. Rather, the scenario is used to postulate the failure of multiple safety systems as in typical reactor event scenarios, but as a result of aspects of a terrorist event. However, scenarios should never clearly identify target sets. Simulated equipment out of service and damage exceeding any single target set should be used. Additionally, specific repair measures may also be of value to adversaries. Due to the potential information value, licensee organizations should keep scenarios "not publicly available" in accordance with 10 CFR 2.390, although summaries without detailed component information may be released. Sharing experiences and insights with other emergency responders is expected. However, some level of discretion is appropriate when considering sharing with a wider audience if sharing could provide sensitive information.

As with ingestion pathway exercises, FEMA-REP-14 security-based exercise objectives must be developed to address the response differences from traditional radiological event drills. Additionally, several current General Emergency and plume-related objectives will not be demonstrated (due to the time jump) in order to allow the recovery actions to take place. For example, the security scenario may postulate a General Emergency with no release during the time jump:

- Objectives 6/8 (Field Radiological Monitoring), 7 (Dose Projection), 9 (Protective Action Decision Making), and 11 (Public Instructions and Emergency Information) will be given to the players as initial conditions.
- Objectives such as 15/16 (Special Populations/Schools) need modifications to their current extent of conditions for this type of exercise.
- New objectives must be developed to address the greater site response (police, fire, medical) and mutual aid agreements. Communications, incident command and impacted area ingress will be added.

*NOTE: These elements are not meant to be an exhaustive list and other elements may be added.*

All exercise extent-of-play and objective modifications needed to allow the substitution of a security-related exercise for a traditional radiological exercise will require DHS endorsement prior to implementation.

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Initiative 3: Review of EP regulations and guidance for commercial nuclear power plants.

The staff conducted a successful and well attended public meeting on August 31 and September 1, 2005. The purpose of that meeting was to obtain stakeholder input on selected topics related to the review of EP regulations and guidance in the post-9/11 threat environment for commercial NPPs. The meeting was conducted as a roundtable discussion among participants who were invited to represent the spectrum of interests in the area of EP. The spectrum included representatives from State, local, and Tribal governments; DHS; NRC; advocacy groups; and the nuclear industry. A list of the roundtable participants and the agenda are provided in Attachment 2. The stakeholders raised issues on the following topics:

- Abbreviated notification to the NRC and the OROs, and the timing, sequencing, and technological means of the notifications
- EP-security integrated drill and exercise program
- Offsite protective actions, specifically the distinction between "sheltering" and broadcast monitoring, often referred to as "heightened awareness"
- Licensee protective action recommendations (PARs) for security events during a Site Area Emergency
- Backup power to siren systems

The staff is now analyzing comments from the meeting and will provide a comment summary and analysis on the NRC Web site by January 17, 2006 (90 days after the close of the public comment period). While the next semiannual status report will provide a summary of the staff's comment analysis, general comments and themes from the meeting included the following: (1) State, local and Tribal governments emphasized that they do not believe in a one-size-fits all approach to regulations and hoped that any new requirements would allow flexibility in approach and implementation, (2) public advocacy groups questioned the staff's recent endorsement of RIS 2005-08 "Endorsement of Nuclear Energy Institute (NEI) Guidance 'Range of Protective Actions for Nuclear Power Plant Incidents,'" and (3) all stakeholders appreciated the opportunity to have their views heard at the meeting and requested future opportunities for a continuing dialogue in the process of enhancing EP regulations and guidance.

In addition to the topics discussed at the public meeting, the staff has a list of potential changes to EP regulations and/or guidance and is prioritizing these issues. The staff is also evaluating an effective method for developing a partnership with stakeholders, for example, by establishing a working group or advisory panel with representatives from NRC, DHS, State, local and Tribal governments, licensees, and public advocacy groups.

Consistent with the February 25, 2005, memo to the Commission, the staff is on schedule to send the Commission a paper at the end of the fourth quarter of FY 2006 on the results of the review of EP regulations and guidance. The paper will include a framework of potential changes to the regulations and guidance, along with next steps, priorities, and resource estimates.

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Initiative 5: Review of licensee responses to the Imminent Threat Safeguards Advisory (SA-05-02) and the EP aspects of Section B.5.b. of the February 25, 2002, Order.

The staff reviewed licensee responses to the Imminent Threat Safeguards Advisory (SA-05-02.) This advisory provided limited EP guidance on EALs, prompt NRC notifications, and onsite protective measures for an air attack. In general, licensees will adopt the onsite protective measure guidance. No licensee discussed prompt notification to the NRC and the majority of the licensees referred to their existing emergency plans for the EALs. This was attributed to the licensees' need for information that was subsequently provided in Bulletin 2005-02. The summary of implementation of these enhancements is provided in Initiative 1.

The staff is supporting the ongoing Phase I effort to review licensees' plans and schedules for addressing the expectations in the February 2005 guidance on complying with Section B.5.b of the February 2002 Order for Interim Safeguards and Security Compensatory Measures. The staff will brief the Commission on the results of this review at a later date.

Initiative 6: Transition of the oversight for the EP component of force-on-force exercises to the regional offices.

In Staff Requirements-SECY-05-0010 "Recommended Enhancements of Emergency Preparedness Response at Nuclear Power Plant in Post-9/11 Environment," the Commission reviewed and approved the staff's recommendations to transition the support of the EP segment during force-on-force (FOF) exercises. The staff has developed a draft inspection procedure for the transition of the oversight for the EP component of the FOF exercises to the regional offices. This procedure has been piloted at an FOF exercise using the resident inspectors and seeking their feedback. The draft procedure was provided to the regions for their review and comment. The current goal is to transition the oversight for the EP component of FOF exercises to the regional offices by the end of calendar year 2005. Currently, NRC spends up to 20 hours per year at each site observing EP drill activities. The revised inspection module will have the regional inspectors continue to observe the EP drill activity, including the EP portion of an FOF exercise during the years that the FOF occurs at that site (triennial basis). This initiative is currently on schedule.

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U.S. Nuclear Regulatory Commission  
Public Roundtable Discussion on Emergency Planning Issues  
August 31, 2005

**Roundtable Participants**

**Rochelle Becker**

Executive Director  
Alliance for Nuclear Responsibility

**Jeffery A. Benjamin**

Vice President  
Licensing and Regulatory Affairs  
Exelon Nuclear

**Samuel Collins**

Regional Administrator  
Region I  
U.S. Nuclear Regulatory Commission

**Craig Conklin**

Chief  
Nuclear and Chemical Hazards Branch  
Preparedness Division  
Department of Homeland Security  
Federal Emergency Management Agency

**Eric Epstein**

Chairman  
TMI-Alert, Inc.

**Jana Fairow**

Manager  
Preparedness Programs  
Illinois Emergency Management Agency

**Andrew Feeney**

Deputy Director  
New York State Emergency Management Office

**Aubrey V. Godwin**

Director  
Arizona Radiation Regulatory Agency

Attachment 2

**Onalee Grady-Erickson**

Senior Planner

Minnesota Department of Public Safety

Division of Homeland Security and Emergency Management

**Debbie Grinnell**

Resource Advocate

C-10 Research and Education Foundation

**Paul Gunter**

Reactor Watchdog Project Director

Nuclear Information and Resource Service (p.m.)

**Ted Jackson**

Manager

Environmental Emergency and Radiation Program

Georgia Environmental Protection Division

**Mary Lampert**

Chair

Nuclear Advisory Committee

Town of Duxbury, MA

**Mark S. Lemke**

Emergency Planning Manager

Pacific Gas and Electric Company

**David Lochbaum**

Nuclear Safety Engineer

Union of Concerned Scientists (a.m.)

**Nader Mamish**

Director

Emergency Preparedness Directorate

U.S. Nuclear Regulatory Commission

**Patrick Mulligan**

Chair

Conference of Radiation Control Program Directors (CRCPD) E-6 Committee

**Alan P. Nelson**

Chief, Emergency Preparedness  
Nuclear Energy Institute

**Susan Perkins-Grew**

Emergency Preparedness Manager  
FPL Energy  
Seabrook Station

**Shannon Rindfleisch**

Emergency Planner  
Prairie Island Indian Community

**Stacey Rosenberg**

Team Leader  
Emergency Preparedness Directorate  
U.S. Nuclear Regulatory Commission

**Anthony Sutton**

Commissioner  
Westchester County Department of Emergency Services, NY

**Tracey Vardas**

Emergency Services Coordinator  
Office of Emergency Services  
San Luis Obispo County, CA

**Ned Wright**

Director  
Linn County Emergency Management, IA

\*AGENDA

PUBLIC MEETING ON SELECTED TOPICS FOR THE REVIEW OF EMERGENCY  
PREPAREDNESS REGULATIONS AND GUIDANCE  
FOR COMMERCIAL NUCLEAR POWER PLANTS

Bethesda North Marriott Hotel and Conference Center  
(Across from NRC Headquarters)  
5701 Marinelli Road  
North Bethesda, Maryland 20852  
August 31 and September 1, 2005

**Wednesday, August 31, 2005**

- 8:30 a.m. Meeting objectives, format, ground-rules, participant introductions  
F. Cameron, Facilitator
- 8:45 a.m. Welcome and opening remarks  
R. Zimmerman, NRC
- 9:00 a.m. Background and history  
N. Mamish, NRC
- 9:15 a.m. Overview of industry initiatives  
A. Nelson, Nuclear Energy Institute
- 9:30 a.m. Calibration of meeting objectives and overarching issues  
Roundtable participant discussion  
Audience discussion
- 9:45 a.m. BREAK
- 10:00 a.m. Discussion of onsite enhancements pertaining to the post 9/11 threat  
environment:  
- Security-based emergency action levels (EALs)  
- Onsite protective actions  
- Abbreviated notification to NRC  
- Emergency response organization augmentation  
- Security-based drill and exercise program  
  
Context: T. Blount, NRC  
  
Roundtable participant discussion
- 11:00 a.m. BREAK

- 11:15 a.m. Continued discussion of onsite enhancements  
Audience discussion
- 12:00 p.m. LUNCH
- 1:00 p.m. Discussion of offsite aspects:
- Offsite protective actions
  - Abbreviated notification to offsite response organizations
  - Backup power to siren systems
- Context: C. Conklin, FEMA
- Roundtable participant discussion  
Audience discussion
- 2:00 p.m. BREAK
- 2:15 p.m. Protective action recommendation guidance and related issues
- Context: R. Moody, NRC
- Roundtable participant discussion  
Audience discussion
- 3:30 p.m. BREAK
- 3:45 p.m. Discussion of other emergency preparedness issues of concern  
Audience discussion
- 5:00 p.m. Adjourn for the day

**Thursday , September 1, 2005**

- 8:00 a.m. Reconvene/Announcements
- 8:15 a.m. Observations regarding previous day discussions  
Public comment and discussion  
F. Cameron, Facilitator

- 9:00 a.m. 2005 National Radiological Emergency Preparedness Conference (NREP),  
NRC/FEMA Workshop "Parking Lot" Issues
- Sharing restricted information with offsite responders
  - Resources to implement an integrated response
  - Alternatives to public alerting
  - NRC outreach activities
  - Train/inform public and OROs
- Context: N. Mamish, NRC  
C. Conklin, FEMA
- Public comment and discussion  
F. Cameron, Facilitator
- 10:00 a.m. BREAK
- 10:15 a.m. Continued discussion of "Parking Lot" issues
- 11:15 a.m. BREAK
- 11:30 p.m. Discussion of other emergency preparedness issues of concern
- 12:15 p.m. Closing Remarks  
N. Mamish
- 12:30 p.m. Adjourn meeting

\*Note: This is the official record agenda of the meeting, due to discussions and availability of the participants, the agenda was revised during the meeting.