



**Limerick Generating Station
Medical Services Drill
After Action Report**

Drill Date – September 18, 2018

Radiological Emergency Preparedness (REP) Program



FEMA

This page is intentionally blank.

Limerick Generating Station
Medical Services Drill
After Action Report/Improvement Plan

Published Date: October 18, 2018

Contents

EXECUTIVE SUMMARY	3
SECTION 1: EXERCISE OVERVIEW	4
1.1 Drill Details	4
1.2 Planning Team Leadership	4
1.3 Participating Organizations	5
SECTION 2: DESIGN SUMMARY	6
2.1 Purpose and Design	6
2.2 Objectives, Capabilities and Activities	7
2.3 Scenario Summary	8
SECTION 3: ANALYSIS OF CAPABILITIES	9
3.1 Evaluation and Results	9
3.2 Summary Results of Evaluation	9
3.3 Criteria Evaluation Summaries	12
3.3.1 Private Organizations	12
SECTION 4: CONCLUSION	13
APPENDIX A: EVALUATORS AND TEAM LEADERS	14
APPENDIX B: ACRONYMS AND ABBREVIATIONS	15
APPENDIX C: EXTENT-OF-PLAY AGREEMENT	16

This page is intentionally blank.

EXECUTIVE SUMMARY

On September 18, 2018 a Medical Services (MS-1) Drill was conducted for the 10-mile Plume Exposure Pathway, Emergency Planning Zone (EPZ) around the Limerick Generating Station (LGS) by the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA) Region III. The most recent prior MS-1 Drill for this site was conducted on September 15, 2016.

The purpose of the MS-1 Drill was to assess the State and local offsite response organizations preparedness in responding to a radiological medical emergency. The Drill was held in accordance with FEMA's policies and guidance concerning the evaluation of State and local Radiological Emergency Response Plans (RERP) and procedures.

FEMA wishes to acknowledge the efforts of the many individuals in the Commonwealth of Pennsylvania, Montgomery County Emergency Management Agency, Abington Hospital (AH) – Jefferson Health and the Goodwill Ambulance of Pottstown, who were evaluated during this Drill.

Protecting the public health and safety is the full-time job of some of the Drill participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility as volunteers providing vital emergency services twenty-four (24) hours a day to the communities in which they live. Cooperation and teamwork of all the participants was observed during this drill.

This report contains the final evaluation of the MS-1 Drill. The Commonwealth of Pennsylvania and local organizations demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Level 1 or Level 2 Findings or Plan Issues as a result of this drill.

SECTION 1: EXERCISE OVERVIEW

1.1 Drill Details

Drill Name

Abington Hospital (AH) – Jefferson Health 2018 Medical Services Drill

Type of Drill

Medical Services

Drill Date

September 18, 2018

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

Scenario Type

Radioactive Contaminated/Injured Person

1.2 Planning Team Leadership

Tina Lai Thomas

Technological Hazards Program Specialist

Federal Emergency Management Agency

One Independence Mall

615 Chestnut Street

Philadelphia, PA 19106

Phone: (215) 931-5680

Tina.thomas@fema.dhs.gov

Sandra B. Silva

Emergency Management Specialist

Bureau of Technological Hazards

PA Emergency Management Agency

1310 Elmerton Avenue | Harrisburg, PA 17110

Phone: 717.651.2235

Sansilva@pa.gov

Sara Schmidt

Emergency Preparedness Specialist

Exelon Corporation

200 Exelon Way

Kennett Square, PA 19348

Phone: (267) 533-1426

Sara.Schmidt@exeloncorp.com

1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the LGS 2018 Medical Services Drill:

State Jurisdictions

- Pennsylvania Emergency Management Agency

Risk Jurisdictions

- Montgomery County Emergency Management Agency (MCEMA)

Private Sector Organizations

- Abington Hospital-Jefferson Health
- Goodwill Ambulance of Pottstown

SECTION 2: DESIGN SUMMARY

2.1 Purpose and Design

On December 7, 1979, the President directed the Federal Emergency Management Agency (FEMA) to assume the lead responsibility for all off-site radiological planning and response. FEMA's activities were conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the accident in March 1979.

44 CFR 350 establishes the policies and procedures for FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local government participation in joint exercises with licensees. FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- A. Taking the lead in offsite emergency planning and in the review and evaluation of radiological emergency response plans and procedures developed by State and local governments;
- B. Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- C. Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated December 7, 2015 (Federal Register, Vol. 81, No. 57, March 24, 2016) and;
- D. Coordinating the activities of the following Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Commerce
 - U.S. Nuclear Regulatory Commission
 - U.S. Environmental Protection Agency
 - U.S. Department of Energy
 - U.S. Department of Health and Human Services
 - U.S. Department of Transportation
 - U.S. Department of Agriculture
 - U.S. Department of the Interior
 - U.S. Food and Drug Administration

Representatives of these agencies serve on the Region III Regional Assistance Committee (RAC), which is chaired by FEMA. A Radiological Emergency Preparedness MS-1 Drill was conducted on September 18, 2018, to assess the capabilities of State and 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 LGS.

The purpose of this After Action Report (AAR) is to present the Drill results, and findings on the performance of the Off-site Response Organizations (OROs) during a simulated radiological emergency involving a contaminated injured individual.

The Drill was designed to demonstrate and evaluate the responder's knowledge of patient and responder personal protective measures, equipment preparation and employment, and decontamination procedures. All activities were demonstrated in accordance with the participants' plans and procedures as they would be performed in an actual emergency, except as agreed to in the Exercise Plan and Extent-of-Play (EOP) Agreement.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region III Regional Assistance Committee (RAC) Chairperson and approved by FEMA Headquarters. These reports are provided to the Nuclear Regulatory Commission (NRC) and participating States. State and local governments utilize the findings contained in these reports for the purposes of planning, training, and improving emergency response capabilities.

- Section 1 of this report, entitled Overview, presents the Exercise Planning Team and the Participating Organizations.
- Section 2 of this report, entitled Design Summary, includes the Purpose and Design, Objectives, Capabilities and Activities, and the Scenario Summary.
- Section 3 of this report, entitled Analysis of Capabilities contains detailed Evaluation and Results; a Summary Results of Evaluation; and Criteria Evaluation Summary. Information on the demonstration for each jurisdiction or functional entity evaluated is presented in a jurisdiction-based, issue-only format.
- Section 4 of this report, entitled Conclusion, is a description of FEMA's overall assessment of the capabilities of the participating organizations.

The criteria utilized in the FEMA evaluation process are contained in the following:

- NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980;
- Radiological Emergency Preparedness Program Manual, January 2016

2.2 Objectives, Capabilities and Activities

The Limerick Generating Station (LGS) MS-1 Drill evaluated by FEMA, was designed to demonstrate that the ORO can transport, transfer, monitor, decontaminate and treat a contaminated/injured person while minimizing any cross contamination during a radiological emergency.

The demonstration included the ability to:

- A. Respond to a radiation medical emergency following Montgomery County Emergency Management Agency, Abington Hospital (AH) – Jefferson Health and Goodwill Ambulance of Pottstown procedures.
- B. Monitor for radiation contamination and uptake, and to validate persons providing these services are adequately prepared to handle contaminated individuals.
- C. Conduct timely and accurate communications between the hospital and offsite response agencies.
- D. Exhibit correct priorities and appropriate techniques in Emergency Medical Services (EMS); transportation of patients; and pre-hospital and hospital emergency care of patients contaminated with radiation.
- E. Demonstrate inter-agency cooperation between the Abington Hospital (AH) – Jefferson Health and Goodwill Ambulance of Pottstown.

2.3 Scenario Summary

The scenario began at Limerick Generating Station (LGS) and escalated to a General Emergency (GE) and a recommended evacuation. An evacuee that was riding a bicycle to the monitoring/decontamination center lost control of his bicycle due to wet pavement and crashed into a parked vehicle that was in the process of being decontaminated. As a result of the impact, the evacuee sustained injuries to the right side of his head and right shoulder area.

The patient has a possible concussion. Witnesses stated the accident victim was initially confused and dazed as a result of the impact. The victim's right shoulder is disfigured, bruised, and swollen with a possible fracture (not immediately known without X-rays). The victim also sustained abrasions to the right brachium (upper area of the arm).

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Evaluation and Results

Contained in this section are the results and findings of the evaluations of all jurisdictions and locations that participated in the September 18, 2018 LGS MS-1 Drill. The Drill was conducted to demonstrate the ability of the OROs to respond to a potentially contaminated injured person associated with LGS.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of the appropriate Demonstration Criteria contained in the REP Program Manual. Detailed information on the Demonstration Criteria and the Extent-of-Play Agreement are found in Appendix C.

The Drill was conducted and evaluated in accordance with the Radiological Emergency Preparedness Program Manual (January 2016) and NUREG-0654/FEMA-REP-1, Rev. 1. The Demonstration Criteria included:

1. e.1- Equipment, maps, displays, monitoring instruments, dosimetry, Potassium Iodide (KI) and other supplies are sufficient to support emergency operations.
3. a.1- The OROs issue appropriate dosimetry, KI, 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.
6. d.1- The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

3.2 Summary Results of Evaluation

The matrix presented in Table 3.1, on the following pages, presents the status of the Demonstration Criteria from the REP Program Manual that were scheduled for demonstration during this Drill by all participating jurisdictions and functional entities. Drill Demonstration Criteria are listed by number and the demonstration status of the criteria is indicated by the use of the following letters:

(L1) Level 1 Finding: An observed or identified inadequacy of organizational performance in an exercise that could cause a determination that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in event of a radiological emergency to protect the health and safety of the public living in the vicinity of a Nuclear Power Plant (NPP).

(L2) Level 2 Finding: An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety.

(P) Plan Issue: An observed or identified inadequacy in the off-site response organizations'

emergency plan/implementing procedures, rather than that of the ORO's performance.

(N) Not Demonstrated: The term applied to the status of a REP Evaluation Area Criterion indicating that the ORO, for a justifiable reason, did not demonstrate the Evaluation Area Criterion, as required in the Extent-of-Play Agreement or at the two-year or eight-year interval required in the FEMA REP Program Manual.

(M) Met: The status of a REP Evaluation Area Criterion indicating that the participating ORO demonstrated all demonstration criteria for the Evaluation Area Criterion to the level required in the Extent-of-Play Agreement with no findings assessed in the current exercise and no unresolved prior findings.

Table 3.1 – Summary of Drill Evaluation

Date: 2018-September-18 Site: Limerick Generating Station (M) Met, (1) Level 1 Finding, (2) Level 2 Finding, (P) Planning Issue		AH-JH	GAPEMS
Emergency Operations Management			
Mobilization	1a1		
Facilities	1b1		
Direction and Control	1c1		
Communications	1d1		
Equipment and Supplies to Support Operations	1e1	M	M
Protective Action Decision Making			
Emergency Worker Exposure Control	2a1		
Accident Assessment and Plans for the Emergency Event	2b1		
PAD decision-making process and coordination for the General Public	2b2		
PADs for disabilities & access/functional needs people	2c1		
Radiological Assessment & Decision making for the Ingestion Pathway	2e1		
Radiological Assessment & Decision making for	2d1		
Protective Action Implementation			
Implementation of Emergency Worker Exposure Control	3a1	M	M
Implementation of KI PAD for Institutionalized Individuals/Public	3b2		
Implementation of PADs for disabilities & access/functional needs people	3c1		
Implementation of PADS for Schools	3c2		
Implementation of Traffic and Access Control	3d1		
Impediments to Evacuation	3d2		
Implementation of Relocation/Reentry/Return Decisions	3f1		
Field Measurements and Analysis			
RESERVED	4a1		
Field Team Management	4a2		
Plume Phase Field Measurement, Handling, & Analyses	4a3		
Post Plume Phase Field Measurements & Sampling	4b1		
Emergency Notification and Public Information			
Activation of the Prompt Alert & Notification System (ANS)	5a1		
RESERVED	5a2		
Activation of the Back-up ANS	5a3		
Activation of the Exception Area ANS	5a4		
Emergency Information & Instructions to the Public/Media	5b1		
Support Operations/Facilities			
Monitoring, Decontamination, & Registration of Evacuees	6a1		
Monitoring/Decontamination of Emergency Workers and Equipment	6b1		
Temporary Care of Evacuees	6c1		
Transportation/Treatment of Contaminated Injured Individuals	6d1	M	M

3.3 Criteria Evaluation Summaries

3.3.1 Private Organizations

3.3.1.1 Montgomery County, Abington Hospital (AH) – Jefferson Health

In summary, the status of DHS/FEMA criteria for the Private Sector Organizations are as follows:

- a. MET: 1.e.1; 3.a.1; 6.d.1
- b. LEVEL 1 FINDINGS: NONE
- c. LEVEL 2 FINDINGS: NONE
- d. PLAN ISSUES: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

3.3.1.2 Montgomery County, Goodwill Ambulance of Pottstown

In summary, the status of DHS/FEMA criteria for the Private Sector Organizations are as follows:

- a. MET: 1.e.1; 3.a.1; 6.d.1
- b. LEVEL 1 FINDINGS: NONE
- c. LEVEL 2 FINDINGS: NONE
- d. PLAN ISSUES: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

SECTION 4: CONCLUSION

The Commonwealth of Pennsylvania and private sector organizations, except where noted in this report, demonstrated knowledge of their radiological emergency response plans and procedures and they were successfully implemented during the Limerick Generating Station (LGS) Medical Service (MS-1) Drill evaluated on September 18, 2018.

Two FEMA evaluators provided analyses of six evaluation criteria. These analyses resulted in a determination of no Findings, no new Plan Issues, and no unresolved Plan Issues.

The Goodwill Ambulance of Pottstown successfully demonstrated that necessary equipment and supplies were available to support the treatment of an injured/contaminated patient. EMS personnel prioritized life-saving medical practices over contamination concerns, implemented protective measures through the use of Personal Protective Equipment (PPE), regular glove changes, and control of cross contamination. Appropriate patient assessments were demonstrated as well as regular and ongoing communications with Abington Hospital (AH)-Jefferson Health.

The Abington Hospital (AH) – Jefferson Health successfully demonstrated the mobilization of staff, staffing assignments, issue of dosimetry and monitoring equipment, and effective use of Personal Protective Equipment during the exercise. The hospital staff effectively responded to communications from the Goodwill Ambulance of Pottstown, initiated the set-up and management of a Radiation Emergency Area, and accepted and successfully treated an injured/contaminated patient while administering life-saving medical attention over contamination concerns. In addition, the medical facility provided security control of the facility including the drop off bay for the patient and overall protective measures for contamination control and prevention of cross contamination.

Based on the results of the drill and a review of the offsite radiological emergency response plans and procedures submitted, FEMA Region III has determined they are adequate (meet the planning and preparedness standards of NUREG-0654/FEMA-REP-1, Revision 1, November 1980, as referenced in 44 CFR 350.5) and there is reasonable assurance they can be implemented, as demonstrated during this drill.

An Improvement Plan (IP) will not be required as part of this report.

APPENDIX A: EVALUATORS AND TEAM LEADERS

The following is the list of Evaluators and Team Leaders for the LGS 2018 MS-1 Drill evaluated on September 18, 2018. The following constitutes the managing staff for the Evaluation:

- Thomas Scardino, DHS/FEMA, Regional Assistance Committee Chairman
- Tina Thomas, DHS/FEMA, Technological Hazards Program Specialist, Lead Evaluator

DATE: September 18, 2018

SITE: Limerick Generating Station

LOCATION	EVALUATOR	AGENCY
Abington Hospital-Jefferson Health	Patricia Gardner	FEMA RIII
Goodwill Ambulance of Pottstown	Tina Thomas	FEMA RIII

APPENDIX B: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAR	After Action Report
ALARA	As Low As Reasonably Achievable
ALC	Annual Letter of Certification
ANS	Alert and Notification System
BRP	Bureau of Radiation Protection
DHS	Department of Homeland Security
DRD	Direct Reading Dosimeter
EMS	Emergency Medical Services
EOP	Extent of Play
EPZ	Emergency Planning Zone
FASP	First Aid and Safety Patrol
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Team
GE	General Emergency
IP	Improvement Plan
KI	Potassium Iodide
LGS	Limerick Generating Station
MCEMA	Montgomery County Emergency Management Agency
MS-1	Medical Services
NPP	Nuclear Power Plant
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
PEMA	Pennsylvania Emergency Management Agency
PPE	Personal Protective Equipment
PRD	Permanent Record Dosimeter
RAC	Regional Assistance Committee
REA	Radiation Emergency Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Preparedness Program
SAE	Site Area Emergency
SOP	Standard Operating Procedure
SAV	Staff Assistance Visit

APPENDIX C: EXTENT-OF-PLAY AGREEMENT

The Extent-of-Play Agreement was extracted from the Exercise Plan, which was drafted by Pennsylvania Emergency Management Agency, and is included in this report as an Appendix. The Extent-of-Play was negotiated and agreed upon by FEMA Region III, and Pennsylvania Emergency Management Agency.

The Exercise Plan was created as an overall tool for facilitation and implementation of the LGS MS-1 Drill and to integrate the concepts and policies of the Homeland Security Exercise Evaluation Program with the Radiological Emergency Preparedness Program Exercise Methodology.

**Limerick Generating Station
Abington Hospital-Jefferson Health
September 18, 2018**

Method of Operation

1. The power station and its personnel will not play as active role in the facilitation of this exercise. The plant's simulated events, radiation releases, and emergency classifications will be injected by off-site controllers. A pre-approved scenario will be used.
2. The Pennsylvania Emergency Management Agency (PEMA), PEMA Central Area Office and the Bureau of Radiation Protection (BRP) will not be activated as part of this exercise. The Exercise Coordinator will provide pre-exercise coordination and observe exercise activities.
3. Exelon will participate as a Controller in this exercise.
4. Montgomery County Emergency Management Agency will provide pre-exercise coordination, participate in this exercise as the county communications coordinator and observe exercise activities
5. Controllers will be supplied by PEMA/Exelon. Controllers are not players and will provide injects and information to initiate and stimulate exercise play by providing radiological readings during the monitoring of personnel. Live radioactive sources will only be used to perform operational checks of radiological monitoring instruments.
6. PEMA staff and qualified county emergency management personnel will be assigned to key locations for the purpose of observing, noting response actions and conditions, and recording observations for future use. Observers will not take an active part in the proceedings, but will interact with staff members to the extent necessary to fulfill their observer responsibilities. Coaching of players is not permitted, except as appropriate to provide training to participants awaiting a re-demonstration.
7. Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA), Radiological Emergency Preparedness Program (REPP) Evaluators: FEMA Evaluators will be present at designated demonstration locations.
8. Exercise activities are scheduled to commence on or about 0800, September 18, 2018 and continue until the participants have completed the exercise objectives and demonstrated the Exercise Evaluation Criteria.

9. Participants and agencies will Stand Down when the Controllers have confirmed with the evaluators that all evaluation criteria have been demonstrated and when the State and County Observers are satisfied that the Objectives have been met.
10. An emergency plan is drafted to address the generally expected conditions of an emergency. Not everything in the emergency plan may be applicable for a given scenario. The main purpose of an emergency plan is to assemble sufficient expertise and officials so as to properly react to the events as they occur. The responders should not be so tied to a plan that they cannot take actions that are more protective of the public. Therefore, if, by not following the plan, the responders protect the public equally as well as provided in the plan, it should be noted for possible modification of the plan, but not classified as a negative incident. Furthermore, if, by following the plan there is a failure to protect the public health and safety, it should be noted so that the plan can be modified and the appropriate negative assessment corrected.
11. During the exercise any activity that is not satisfactorily demonstrated may be re-demonstrated by the participants during the exercise, provided it does not negatively interfere with the exercise. Refresher training may be provided by the players, observers, and/or controllers. Re-demonstrations will be negotiated between the players, observers, controllers, and evaluators. It is permissible to extend the demonstration window, within reason, to accommodate the re-demonstration. Activities corrected from a re-demonstration will be so noted.

Objectives

- A. Demonstrate the ability to respond to a radiation medical emergency following the procedures of Montgomery County Emergency Management Agency, Goodwill Ambulance of Pottstown EMS and Abington Hospital-Jefferson Health.
- B. Demonstrate timely and accurate communications between the hospital and offsite response agencies. (Telephones will be used in lieu of radios whenever possible to limit the potential misinterpretation of the exercise as an actual event.)
- C. Demonstrate correct priorities and appropriate techniques in EMS, transportation of patients and pre-hospital and hospital emergency care of radioactively contaminated patients.
- D. Demonstrate inter-agency cooperation between the Ambulance Company/EMS and the Hospital.

Limerick Generating Station
Abington Hospital (AH) – Jefferson Health Medical Service Exercise

Extent-of-Play

Evaluation Area 1—Emergency Operations Management

Sub-Element 1.e—Equipment and Supplies to Support Operations

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

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).

Assessment/Extent-of-Play

Assessment of this Demonstration Criterion is accomplished primarily through a baseline evaluation and subsequent periodic inspections.

A particular facility's equipment and supplies must be sufficient and consistent with that facility's assigned role in the ORO's emergency operations plans. Use of maps and other displays is encouraged. For non-facility based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. At locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and signs) must be available, or their availability described.

Specific equipment and supplies that must be demonstrated under this criterion include KI inventories, dosimetry, and monitoring equipment, as follows:

KI: Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (1) emergency workers; (2) institutionalized individuals, as indicated in capacity lists for facilities; and (3) where stipulated by the plans/procedures, members of the general public (including transients) within the plume pathway EPZ. In addition, OROs must demonstrate provisions to make KI available to specialized response teams (e.g., civil support team, Special Weapons and Tactics Teams, urban search and rescue, bomb squads, HAZMAT, or other ancillary groups) as identified in plans/procedures). The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI, as well as a mechanism for identifying emergency workers that have declined KI in advance. Consider carefully the placement of emergency workers that have declined KI in advance.

ORO quantities of dosimetry and KI available and storage locations(s) will be confirmed by physical inspection at the storage location(s) or through documentation of current inventory submitted during the exercise, provided in the Annual Letter of Certification (ALC) submission, and/or verified during a Site Assistance Visit (SAV). Available supplies of KI must be within the expiration date indicated on KI bottles or blister packs. As an alternative, the ORO may produce a letter from a certified private or State laboratory indicating that the KI supply remains potent, in accordance with U.S. Pharmacopoeia standards.

Dosimetry: Sufficient quantities of appropriate direct-reading and permanent record dosimetry and dosimeter chargers must be available for issuance to all emergency workers who will be dispatched to perform an ORO mission. In addition, OROs must demonstrate provisions to make dosimetry available to specialized response teams (e.g., civil support team, Special Weapons and Tactics Teams, urban search and rescue, bomb squads, HAZMAT, or other ancillary groups) as identified in plans/procedures.

Appropriate direct-reading dosimetry must allow an individual(s) to read the administrative reporting limits and maximum exposure limits contained in the ORO's plans/procedures.

Direct-reading dosimeters must be zeroed or operationally checked prior to issuance. The dosimeters must be inspected for electrical leakage at least annually and replaced when necessary. Civil Defense Victorian Model 138s (CD V-138s) (0-200 mar), due to their documented history of electrical leakage problems, must be inspected for electrical leakage at least quarterly and replaced when necessary. This leakage testing will be verified during the exercise, through documentation submitted in the ALC and/or through an SAV.

Operational checks and testing of electronic dosimeters must be in accordance with the manufacturer's instructions and be verified during the exercise, through documentation submitted in the ALC and/or through an SAV.

Monitoring Instruments: All instruments must be inspected, inventoried, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. Unmodified CDV-700 series instruments and other instruments without a manufacturer's recommendation must be calibrated annually. Modified CDV-700 instruments must be calibrated in accordance with the recommendation of the modification manufacturer. A label indicating such calibration must be on each instrument or calibrated frequency can be verified by other means. In addition, instruments being used to measure activity must have a sticker-affixed to their sides indicating the effective range of the readings. The range of readings documentation specifies the acceptable range of readings that the meter should indicate when it is response-checked using a standard test source.

For FMTs, the instruments must be capable of measuring gamma exposure rates and detecting beta radiation. These instruments must be capable of measuring a range of activity and exposure, including radiological protection/exposure control of team members and detection of activity on air sample collection media, consistent with the intended use of the instrument and the ORO's plans/procedures. An appropriate radioactive check source must be used to verify proper operational response for each low-range radiation measurement instrument (less than 1R/hr.) and

for high-range instruments when available. If a source is not available for a high-range instrument, a procedure must exist to operationally test the instrument before entering an area where only a high-range instrument can make useful readings. In areas where portal monitors are used, the OROs must set up and operationally check the monitor(s). The monitor(s) must conform to the standards set forth in the *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*, FEMA-REP-21 (March 1995) or in accordance with the manufacturer's recommendations.

Mutual Aid Resources: If the incoming resources arrive with their own equipment (i.e., monitors and/or dosimetry), they will be evaluated by REP Program standards. FEMA will not inventory equipment that is not part of the REP Program. If an agency has a defined role in the REP Plan, they are subject to the planning process and standards, as well as the guidance of this Manual.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

State Negotiated Extent-of-Play:

Ambulance crews are not trained or equipped to operate or carry radiological monitoring equipment. In accordance with the PEMA SOP Annex E, Appendix 5 "Radiological Exposure Control" (March 2002), ambulance crews operating outside the 10-mile Emergency Planning Zone are considered "Category C" emergency workers; therefore, they are only required to implement protective measures consistent with protection against blood-borne pathogens; i.e., long sleeved garments, trousers, impermeable gloves, and surgical masks. "Category C" emergency worker dosimetry issue consists of one permanent reading dosimeter per worker. Ambulance crews are provided additional dosimetry if they are tasked with entering the 10-mile EPZ.

Hospital personnel are also considered "Category C" emergency workers and will conform to PEMA SOP protective measures at a minimum. Direct Reading Dosimeters may be issued individually; however, an Area Kit will be established in the Radiation Emergency Area (REA). Individual PRDs will be issued by the hospital. Radiological Survey Instruments are calibrated per manufactures recommendations.

Outstanding Issues:

None

Evaluation Area 3—Protective Action Implementation

Sub-Element 3.a—Implementation of Emergency Worker Exposure Control

Intent

This Sub-element is derived from NUREG0654/FEMA-REP-1, which requires that OROs have the capability to provide for the following: distribution, use, collection, and processing of direct-reading dosimetry and permanent record dosimetry; reading of direct-reading dosimetry by emergency workers at appropriate frequencies; maintaining a radiation dose record for each emergency worker; establishing a decision chain or authorization procedure for emergency workers to incur radiation exposures in excess of the PAGs, and the capability to provide KI for emergency workers, always applying the “as low as is reasonably achievable” principle as appropriate.

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, 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, K.3.a, b; K.4)

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial or tabletop exercise. Other means may include drills, seminars or training activities that would fully demonstrate technical proficiency.

OROs must demonstrate the capability to provide emergency workers (including supplemental resources) with the appropriate direct-reading and permanent record dosimetry, dosimeter chargers, KI, and instructions on the use of these items. For evaluation purposes, appropriate direct-reading dosimetry is defined as dosimetry that allows an individual(s) to read the administrative reporting limits that are pre-established at a level low enough to consider subsequent calculation of TEDE and maximum exposure limits, for those emergency workers involved in lifesaving activities, contained in the ORO's plans/procedures.

Each emergency worker must have basic knowledge of radiation exposure limits as specified in the ORO's plans/procedures. If supplemental resources are used, they must be provided with just-in-time training to ensure basic knowledge of radiation exposure control. Emergency workers must demonstrate procedures to monitor and record dosimeter readings and manage radiological exposure control.

During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached. The emergency worker must report accumulated exposures during the exercise as indicated in the plans/procedures. OROs must demonstrate the actions described in the plans/procedures by

determining whether to replace the worker, authorize the worker to incur additional exposures, or take other actions. If exercise play does not require emergency workers to seek authorizations for additional exposure, evaluators must interview at least two workers to determine their knowledge of whom to contact in case authorization is needed, and at what exposure levels. Workers may use any available resources (e.g., written procedures and/or co-workers) in providing responses.

Although it is desirable for all emergency workers to each have a direct-reading dosimeter, there may be situations where team members will be in close proximity to each other during the entire mission. In such cases, adequate control of exposure can be achieved for all team members using one direct-reading dosimeter worn by the team leader. Emergency workers assigned to low-exposure rate fixed facilities (e.g., EOCs and communications center within the EPZ, reception centers, and counting laboratories) may have individual direct-reading dosimeters or they may be monitored using group dosimetry (i.e., direct-reading dosimeters strategically placed in the work area). Each team member must still have his or her own permanent record dosimetry. Individuals authorized by the ORO to re-enter an evacuated area during the plume (emergency) phase, must be limited to the lowest radiological exposure commensurate with completing their missions.

OROs may have administrative limits lower than EPA- 400-R-92-001 dose limits for emergency workers performing various services (e.g., lifesaving, protection of valuable property, all activities). OROs must ensure that the process used to seek authorization for exceeding dose limits does not negatively impact the capability to respond to an incident where lifesaving and/or protection of valuable property may require an urgent response.

OROs must demonstrate the capability to accomplish distribution of KI to emergency workers consistent with decisions made. OROs must have the capability to develop and maintain lists of emergency workers who have ingested KI, including documentation of the date(s) and time(s) they did so. Ingestion of KI recommended by the designated ORO health official is voluntary. For evaluation purposes, the actual ingestion of KI shall not be performed. OROs must demonstrate the capability to formulate and disseminate instructions on using KI for those advised to take it. Emergency workers must demonstrate basic knowledge of procedures for using KI whether or not the scenario drives the implementation of KI use. This can be accomplished by an interview with the evaluator.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

State Negotiated Extent-of-Play:

- *Demonstrate appropriate procedures and equipment to manage radiological exposure to staff.*
- *Demonstrate the ability to transport contaminated/injured individuals while using ALARA principles.*
- *Demonstrate the ability to utilize dosimetry, equipment and procedures to manage radiological exposure to emergency workers as required by plans.*

Radiological briefings will be provided to address exposure limits and procedures to replace

personnel approaching limits and how permission to exceed limits is obtained. At any time, players may ask other players or supervisors to clarify radiological information. In Pennsylvania, emergency workers outside the EPZ do not have turn-back values. Standard issue of dosimetry and potassium iodide for each category of emergency worker is as follows:

Category A: 1 PRD, 1 DRD, and 1 unit of KI

Category B: 1 PRD and 1 unit of KI

Category C: 1 PRD

NOTE: *As per Annex E, Appendix 5, page E-5-35, "Emergency responders located outside the EPZ who, due to assigned tasking's during a nuclear emergency, have limited potential for radiation exposure (e.g., monitoring/decontamination teams, MS-1 hospital staffs). Transporters of contamination or potentially contaminated individuals outside of the EPZ are not provided dosimetry.*

All locations that have dosimetry equipment indicated within their Radiological Emergency Response Plan (RERP) will make the dosimetry equipment (and KI, as appropriate) available for inspection by the Federal Evaluator. Simulation PRDs with mock serial numbers may be used.

Outstanding Issues:

None

Evaluation Area 6—Support Operation/Facilities

Sub-Element 6.d—Transportation and Treatment of Contaminated Injured Individuals

Intent

This Sub-element is derived from NUREG0654/FEMA-REP-1, which requires that OROs have the capability to transport contaminated injured individuals to medical facilities with the capability to provide medical services.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals. (NUREG0654/FEMA-REP-1, F.2; H.10; K.5.a, b; L.1, 4)

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or drills. FEMA has determined that these capabilities have been enhanced and consistently demonstrated as adequate; therefore, offsite medical services drills need only be evaluated biennially. FEMA will, at the request of the ORO, continue to evaluate the drills on an annual basis. All hospitals listed in the plan as medical services hospitals must be evaluated, with a transportation provider, every 2 years. Additional transportation providers will be rotated through the drills in the 8-year exercise cycle. For the ambulance providers who do not participate in an evaluated drill during the two-year cycle, training will be provided. This training will be documented in the ALC.

Monitoring, decontamination, and contamination control efforts must not delay urgent medical care for the victim.

OROs must demonstrate the capability to monitor/decontaminate and transport contaminated injured individuals to medical facilities.

An ambulance must be used for response to the victim. However, to avoid taking an ambulance out of service for an extended time, OROs may use any vehicle (e.g., car, truck, or van) to transport the victim to the medical facility. It is allowable for an ambulance to demonstrate up to the point of departure for the medical facility and then have a non-specialized vehicle transport the "victim(s)" to the medical facility. This option is used in areas where removing an ambulance from service to drive a great distance (over an hour) for a drill would not be in the best interests of the community.

Normal communications between the ambulance/dispatcher and the receiving medical facility must be demonstrated. If a substitute vehicle is used for transport to the medical facility, this communication must occur before releasing the ambulance from the drill. This communication would include reporting radiation monitoring results, if available. In addition, the ambulance crew must demonstrate, by interview, knowledge of where the ambulance and crew would be monitored and decontaminated, if required, or whom to contact for such information.

Monitoring of the victim may be performed before transport or end route, or may be deferred to the medical facility. Contaminated injured individuals transported to medical facilities are monitored as soon as possible to assure that everyone (ambulance and medical facility) is aware of the medical and radiological status of the individual(s). However, if an ambulance defers monitoring to the medical facility, then the ambulance crew presumes that the patient(s) is contaminated and demonstrate appropriate contamination controls until the patient(s) is monitored. Before using monitoring instruments, the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation. All monitoring activities must be completed as they would be in an actual emergency. Appropriate contamination control measures must be demonstrated before and during transport and at the receiving medical facility.

The medical facility must demonstrate the capability to activate and set up a radiological emergency area for treatment. Medical facilities are expected to have at least one trained physician and one trained nurse to perform and supervise treatment of contaminated injured individuals. Equipment and supplies must be available for treatment of contaminated injured individuals.

The medical facility must demonstrate the capability to make decisions on the need for decontamination of the individual, follow appropriate decontamination procedures, and maintain records of all survey measurements and samples taken. All procedures for collection and analysis of samples and decontamination of the individual must be demonstrated or described to the evaluator. Waste water from decontamination operations must be handled according to facility plans/procedures.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

State Negotiated Extent-of-Play:

Demonstrate that the facility has the appropriate space, adequate resources and trained personnel to provide monitoring, decontamination and medical services to contaminated/injured individuals.

Demonstrate the ability to transport contaminated/injured individuals while using ALARA principles.

Goodwill Ambulance of Pottstown EMS will pick-up a pre-staged simulated contaminated/injured patient.

Outstanding Issues:

None