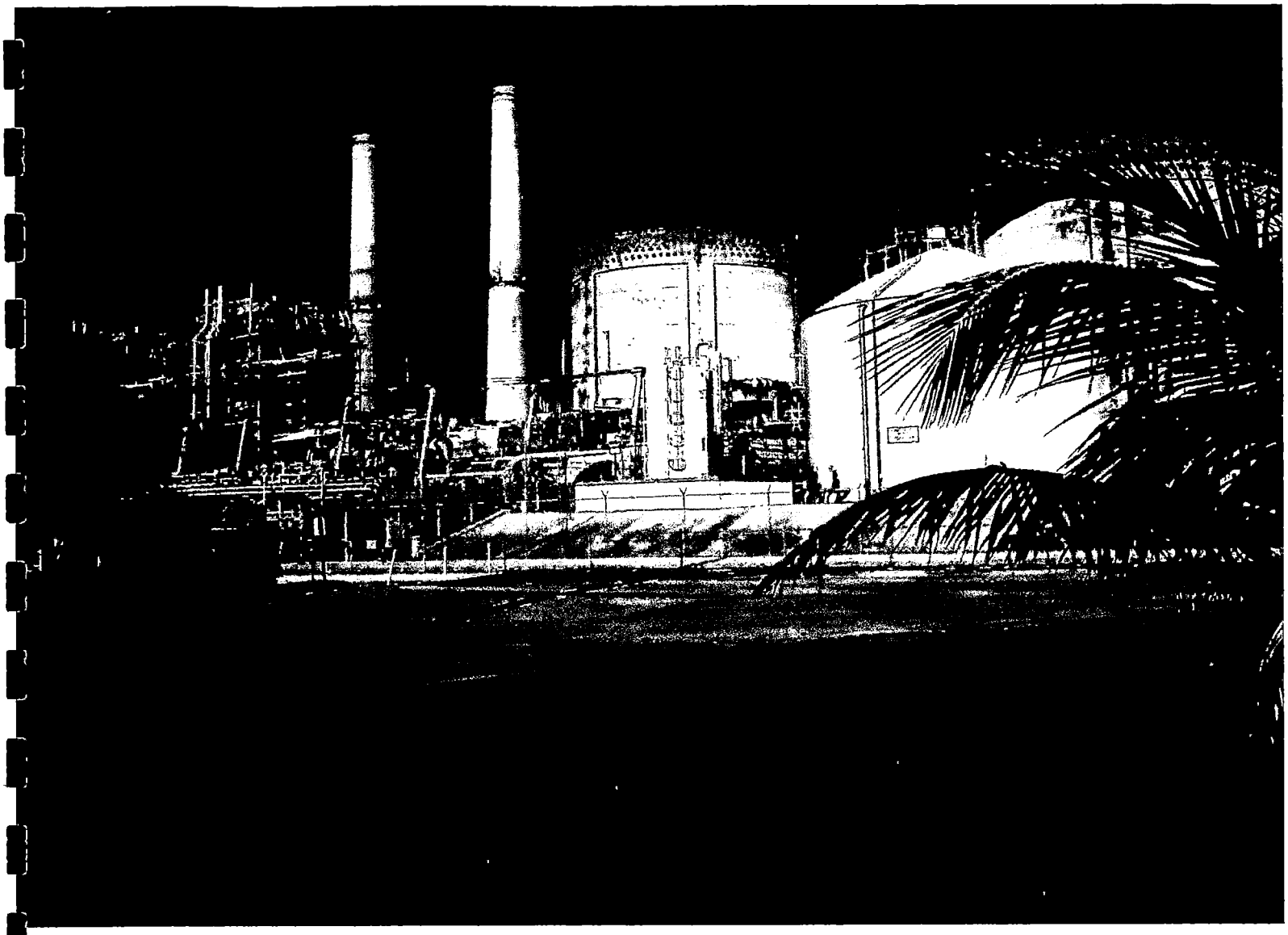
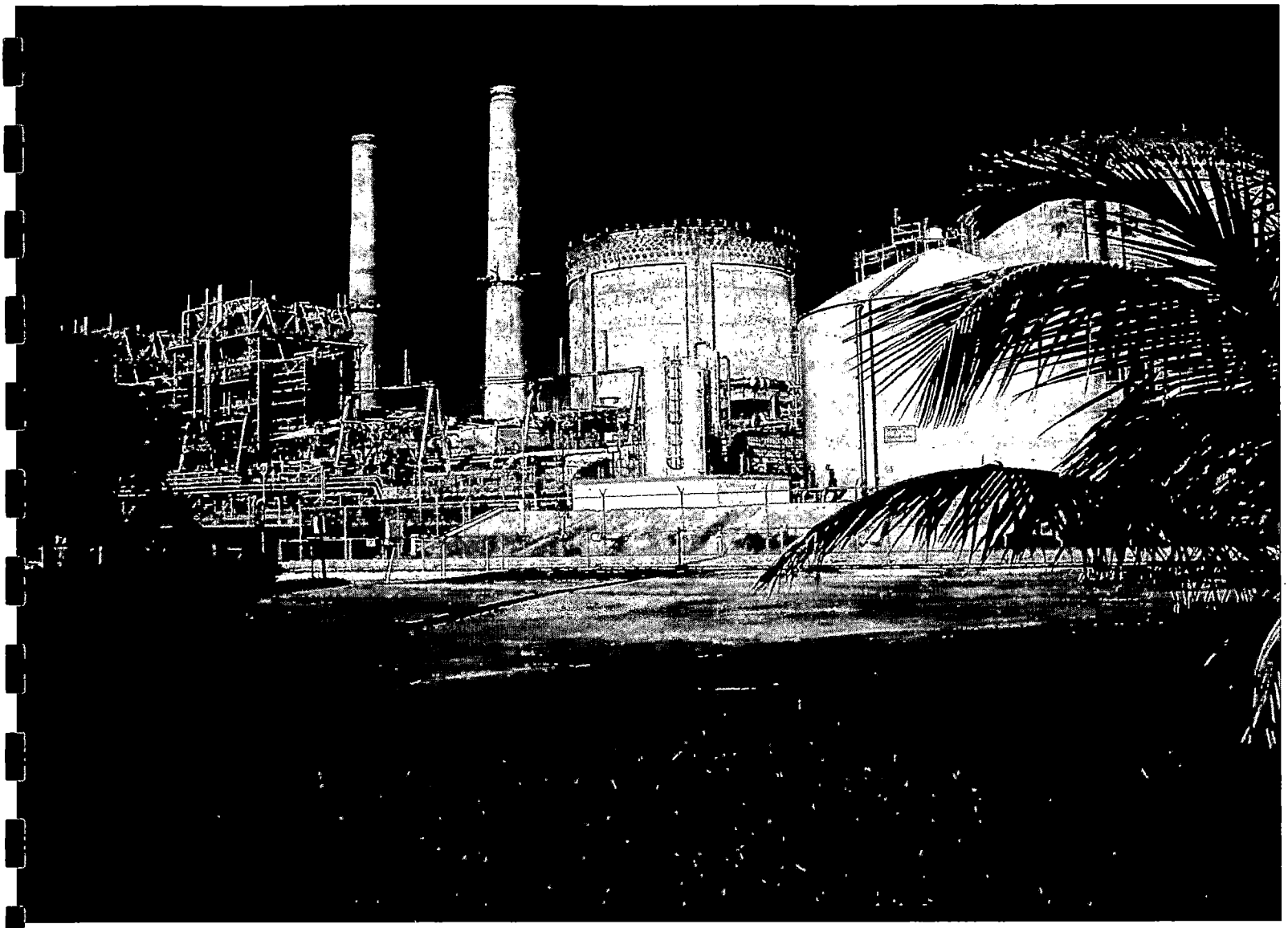


Final After Action Report

Turkey Point Nuclear Power Plant
Radiological Emergency Preparedness Exercise
Date: February 20, 2019

October 2, 2019

FEMA



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Executive Summary

On February 20, 2019, the U.S. Department of Homeland Security/Federal Emergency Management Agency Region IV, Radiological Emergency Preparedness Program staff evaluated a full participation plume exposure pathway exercise for the Turkey Point Nuclear Power Plant. These evaluations also included out of sequence activities conducted March 6 and March 13, 2019.

The Turkey Point Nuclear Power Plant is operated by Florida Power and Light and is located in Miami-Dade County approximately 25 miles south of Miami on the shore of Biscayne Bay and two miles east of Homestead, Florida. The Turkey Point Nuclear Power Plant 10-mile emergency planning zone is divided into 10 emergency response areas and encompasses parts of Miami-Dade and Monroe Counties.

The Federal Emergency Management Agency's overall objective of the exercise was to assess the level of state and local preparedness in coordinating and responding to an emergency at the Turkey Point Nuclear Power Plant. This exercise was held in accordance with Federal Emergency Management Agency's policies and guidance concerning the exercise of state and local radiological emergency response plans and procedures. The previous federal evaluated exercise was conducted on February 22, 2017. The qualifying emergency preparedness exercise was conducted February 10, 11, and 12, 1982.

Officials and representatives from the State of Florida, Miami-Dade and Monroe Counties, U.S. Coast Guard, Florida National Guard, Homestead Air Reserve Base, U.S. National Park Service, and Florida Power and Light, as well as numerous volunteers and other organizations, participated in this exercise. These organizations demonstrated knowledge of their emergency response plans and procedures and successfully implemented them. It was apparent during the exercise that a great deal of training and coordination was conducted by the offsite response organizations to successfully demonstrate the ability to protect the health and safety of the public. Both Miami-Dade and Monroe Counties used this exercise and associated out of sequence activities to validate plan changes and enhance their current level of preparedness. All jurisdictions met their exercise objectives and demonstrated the corresponding core capabilities identified in Section 2.2 of this report. No level 1 or 2 findings were identified during the exercise cycle.

The Federal Emergency Management Agency wishes to acknowledge the efforts of the many individuals who participated in the exercise and made it a success. The professionalism and teamwork of the participants was evident throughout all phases of the exercise.

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Section 1: Exercise Overview

1.1 Exercise Details

Exercise Name
2019 Turkey Point Nuclear Power Plant Radiological Emergency Preparedness Exercise

Type of Exercise
Full Participation Exercise

Exercise Date
February 20, 2019

Exercise Off-Scenario/Out of Sequence Dates
March 6 and March 13, 2019

Program
U.S. Department of Homeland Security, Federal Emergency Management Agency, Radiological Emergency Preparedness Program

Mission
Response

Locations: Various.

Scenario Type
Plume-Phase Radiological Emergency Preparedness Exercise

1.2 Exercise Planning Team Leadership

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Orlando, Florida 32818

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Florida City, Florida 33035

1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Turkey Point Nuclear Power Plant exercise.

State of Florida:

- Florida Division of Emergency Management
- Florida Department of Health, Bureau of Radiation Control
- Florida Department of Transportation
- Florida Department of Law Enforcement
- Florida Highway Patrol
- Florida Fish and Wildlife Commission
- Florida National Guard

Risk Jurisdictions:

Miami-Dade County

- Miami-Dade Office of Emergency Management
- Miami-Dade Fire Rescue
- Miami-Dade Police Department
- Miami-Dade Corrections and Rehabilitation
- Miami-Dade County Public Schools Police
- Miami-Dade Health Department
- Miami-Dade Emergency Medical Services
- Miami-Dade Public Schools
- Miami-Dade Parks Service
- Miami-Dade Public Works
- Miami-Dade Transit
- Miami-Dade Water and Sewer
- Homestead Divisional Liaison
- Florida City Divisional Liaison

Monroe County

- Monroe County Emergency Management
- Monroe County Sheriff's Office
- Monroe County Fire Rescue
- Monroe County Department of Health
- Monroe County School Board
- Florida Keys Aqueduct Authority
- Ocean Reef Public Safety Department

Private Organizations:

- Florida Power and Light
- American Red Cross
- Salvation Army
- Mariners Hospital, Key Largo
- Greater Miami Convention and Visitors Bureau
- Florida International University

Federal Agencies:

- US Coast Guard
- Homestead Air Reserve Base
- US National Park Service

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Section 2: Exercise Design Summary

2.1 Exercise Purpose and Design

The Federal Emergency Management Agency administers the Radiological Emergency Preparedness Program pursuant to the regulations found in Title 44 Code of Federal Regulations parts 350, 351, 352, 353 and 354. Title 44 Code of Federal Regulations part 350 codifies sixteen planning standards that form the basis for radiological emergency response planning for state, tribal, and local governments impacted by the emergency planning zones established for each nuclear power plant site in the United States.

Nuclear Regulatory Commission regulations also codify the sixteen planning standards for the licensee. Title 44 Code of Federal Regulations part 350 sets forth the mechanisms for the formal review and approval of state, tribal, and local government radiological emergency response plans and procedures by the Federal Emergency Management Agency. One of the Radiological Emergency Preparedness Program cornerstones established by these regulations is the biennial exercise of offsite response capabilities.

During these exercises, affected state, tribal, and local governments demonstrate their abilities to implement their plans and procedures to protect the health and safety of the public in the event of a radiological emergency at the nuclear plant.

The results of this exercise, together with review of the radiological emergency response plans, and verification of the periodic requirements set forth in NUREG-0654/FEMA-REP-1, along with supplements, through the annual letter of certification and staff assistance visits, enabled the Federal Emergency Management Agency to provide a statement with the transmission of this final after action report to the United States Nuclear Regulatory Commission, that the affected state, tribal, and local plans and preparedness are: (1) adequate to protect the health and safety of the public living in the vicinity of the nuclear power facility by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency; and (2) capable of being implemented.

The State of Florida formally submitted the Radiological Emergency Response Plans for the Turkey Point Nuclear Power Plant to the Federal Emergency Management Agency, Region IV on August 26, 1983. The Federal Emergency Management Agency approved the plans pursuant to 44 Code of Federal Regulations 350 on February 15, 1984. The qualifying emergency preparedness exercise was conducted on February 10, 11, and 12, 1982.

2.2 Exercise Core Capabilities and Objectives

Capabilities-based planning allows for exercise planning teams to develop exercise objectives and observe exercise outcomes through a framework of specific action items that were derived from the National Preparedness Goal's Core Capabilities. The core capabilities listed below form the foundation of FEMA Region IV REP Program objectives and observations for this exercise. These core capabilities, when successfully demonstrated, meet the exercise objectives.

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

- **Public Information and Warning**: Deliver coordinated, prompt, reliable, and actionable information to the whole community using clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard and, as appropriate, the actions being taken, and the assistance being made available.

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

- **On-Scene Security, Protection, and Law Enforcement**: Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and for response personnel engaged in lifesaving and life-sustaining operations.

- **Critical Transportation**: Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.

- **Public Health, Healthcare, and Emergency Medical Services**: Provide lifesaving medical treatment via emergency medical services and related operations and avoid additional disease and injury by providing targeted public health, medical, and behavioral health support, and products to all affected populations.

- **Situational Assessment**: Provide all decision makers with decision-relevant information regarding the nature and extent of the hazard, any cascading effects, and the status of the response.

Using the Homeland Security Exercise and Evaluation Program (HSEEP) methodology, the exercise objectives meet the REP Program requirements and encompass the REP Program emergency preparedness evaluation areas. The critical tasks to be demonstrated were negotiated with the State of Florida and the Counties of Monroe and Miami-Dade. FEMA objectives for this exercise were as follows:

- **Objective 1**: Demonstrate the ability to provide direction and control through the counties and state emergency operations centers, the all-hazard incident management team and the emergency operations facility.

- **Objective 2**: Demonstrate the ability to provide protective action decision making for state and county emergency workers and public through exercise play and discussions of plans and procedures.

- **Objective 3**: Demonstrate the ability to implement protective actions for state and counties' emergency workers and public through exercise play and discussions of plans and procedures.

- **Objective 4**: Demonstrate the ability to activate the Prompt Notification System utilizing the prompt notification system and emergency alert system through exercise play.

- **Objective 5**: Demonstrate the effectiveness of plans, policies and procedures in the joint information system and the establishment of the joint information center for emergency information communications.

- **Objective 6**: Demonstrate the ability to conduct independent dose assessment, and management of field teams.

- **Objective 7**: Demonstrate the ability to alert, notify and evacuate the marine areas surrounding the Turkey Point Nuclear Power Plant.

- **Objective 8**: Demonstrate the ability to provide transport, monitoring, decontamination and medical services to contaminated injured patient.

- **Objective 9:** Demonstrate the ability to perform emergency reception center operations.

Additionally, each capability is linked to several corresponding capability targets and critical tasks to provide additional detail. Specific targets and tasks are listed in the exercise evaluation guides. The objectives align with the listed capabilities as indicated below:

- **Objective 1**: Core Capability – Operational Coordination.
- **Objective 2**: Core Capabilities – Operational Coordination; Situational Assessment.
- **Objective 3**: Core Capability – Environmental Response/Safety and Health; On-Scene Security, Protection, and Law Enforcement; Critical Transportation; Public Health, Healthcare, and Emergency Medical Services.
- **Objective 4**: Core Capabilities – Operational Coordination; Public Information and Warning.
- **Objective 5**: Core Capabilities – Operational Coordination; Public Information and Warning.
- **Objective 6**: Core Capabilities – Situational Assessment; Environmental Response/Safety and Health.
- **Objective 7**: Core Capability – Public Information and Warning.
- **Objective 8**: Core Capability – Public Health, Healthcare, and Emergency Medical Services.
- **Objective 9**: Core Capability – Environmental Response/Safety and Health.

2.3 Overview of Evaluation Methodology

The Homeland Security Exercise and Evaluation Program evaluation methodology is an analytical process used to assess the demonstration of capabilities during exercises. According to this methodology, exercise evaluation incorporates three distinct levels of analysis: critical task-level analysis; capability target-level analysis; and core capability-level analysis.

- ***Critical tasks:*** The distinct elements required to perform a core capability; they describe how the capability target will be met. Critical tasks are the Radiological Emergency Preparedness demonstration criteria taken from the Radiological Emergency Preparedness Program Manual and NUREG-0654/FEMA-REP-1 and supplements generally include the activities, resources, and responsibilities required to fulfill capability targets.
- ***Capability target(s):*** The performance thresholds for each core capability; they state the amount of capability that players aim to achieve. Capability targets are taken from the Radiological Emergency Preparedness assessment areas of Emergency Operations Management, Protective Action Decision Making, Protective Action

Implementation, Field Measurement and Analyses, Emergency Notification /Public Information and Support Operations/Facilities.

- ***Core capabilities:*** The distinct critical elements necessary to achieve a specific mission area (e.g., preparedness). To assess both capacity and gaps, each core capability includes capability targets. The core capabilities of Operational Coordination; Public Information and Warning; Environmental Response/Health and Safety; On-Scene Security, Protection, and Law Enforcement; Critical Transportation; Situational Assessment; Operational Communications; Mass Care; and Public Health, Healthcare, and Emergency Medical Services are used for Federal Emergency Management Agency Region IV Radiological Emergency Preparedness Program exercises. These core capabilities are further defined within the National Preparedness Goal.

2.4 Exercise Scenario

The following is a summary of the scenario developed by Florida Power and Light to drive exercise play.

The exercise began at 0800. At 0805, the metal impact monitoring system alarms with an increase in reactor coolant system radiation monitor readings. It is possible that the Operations Shift Manager may declare an Unusual Event. At 0820, the radiation monitor reaches the threshold for an Alert, based on Emergency Action Level FA1 for the loss of the fuel clad barrier. By 0835, the Alert should be declared.

At 0950, a reactor coolant system leak ramps up to 800 gallons per minute. The operations crew trip the reactor and three control rods do not insert. At 1002, the subsequent fuel damage results in an increase in containment radiation monitor readings. These conditions meet the threshold for a Site Area Emergency. By 1017, a Site Area Emergency should be declared based on Emergency Action Level FS1 for loss of the reactor coolant barrier.

At 1115, a leak from containment results in a monitored, filtered radiological release through the plant vent. At 1135, the plant vent radiation monitor rises above the threshold for a General Emergency, which will be declared based on Emergency Action Level RG1 for an offsite dose projection greater than Protective Action Guidelines. The licensee Protective Action Recommendations will be to evacuate all sectors out to two miles and the downwind sectors R, A, and B out to 10 miles. The exercise will be terminated when all objectives are complete listed as approximately 1200.

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Section 3: Analysis of Capabilities

3.1 Exercise Evaluation and Results

This section contains the results and findings of the evaluation of all jurisdictions and functional entities that participated in the February 20, 2019, plume exposure pathway exercise and out of sequence activities of March 6 and March 13, 2019.

Each jurisdiction and functional entity were evaluated based on the demonstration of core capabilities, capability targets, and critical tasks and the underlying Radiological Emergency Preparedness criteria as delineated in the Federal Emergency Management Agency Radiological Emergency Preparedness Program Manual dated January 2016. Exercise criteria are listed by number, and the demonstration status of those criteria are indicated by the use of the following terms:

- M: Met (no unresolved level 1 or level 2 findings assessed and no unresolved findings from prior exercises)
- 1: Level 1 finding assessed
- 2: Level 2 finding assessed or an unresolved level 2 finding(s) from a prior exercise
- P: Plan issue
- N: Not demonstrated

3.2 Summary Results of Exercise Evaluation

Core capabilities form the foundation of the Federal Emergency Management Agency Region IV Radiological Emergency Preparedness Program evaluations. The core capability summaries below provide an overall combined assessment of state and local jurisdictions based upon their collective demonstrated performance as it relates to the specific core capability. Each jurisdiction's standalone capability summaries are listed in Section 3.3 of this report.

1. **Operational Coordination**: Key leadership personnel from the participating agencies collectively established and maintained a unified and coordinated operational structure, which provided effective and coordinated direction and control. The overall decision-making process integrated critical stakeholders, enabling protective action discussions and subsequent decisions to be made in a reasonable and timely manner.

2. **Situational Assessment**: The State of Florida Department of Health, Bureau of Radiation Control dose assessment team, led by the operations officer, performed their mission in an exemplary manner. They performed dose projections and compared their results with utility dose projections and field team monitoring results. Their work provided critical meteorological and radiological dose related information to decision makers, enabling them to better understand the extent of the

hazard to the public. The operations officer provided decision makers with protective action recommendations based on the information they had just received. Providing this situational awareness enabled decision makers to make knowledgeable protective action decision for the public and emergency workers.

3. **Public Information and Warning:** Alert and notification of the public was made using simulated siren activation, Emergency Alert System messages, route alerting, and reverse calling software. This was followed by supplemental media releases and formal coordinated media briefings in the joint information center. Through these processes, public information staff prepared and delivered coordinated, prompt, and reliable information and instructions to the public and media.

4. **Environmental Response/Health and Safety:** The State of Florida Department of Health, Bureau of Radiation Control provided appropriate staff and resources to support the response. They demonstrated the positioning and management of three field monitoring teams and provided appropriate instructions for emergency worker exposure control. The field team members demonstrated proficiency in using radiation monitoring equipment, sampling procedures and dosimetry for personal exposure control.

   Miami-Dade County Tamiami Park Emergency Reception Center was established. Multiple agencies contributed to its effective operation. The team was able to achieve an evacuee population monitoring rate exceeding Federal Emergency Management Agency requirements. They demonstrated a proficiency in controlling, transporting, and decontaminating large numbers of evacuees. The emergency workers were proficient in personal protective clothing and personal dosimetry use and reporting.

5. **On Scene Security, Protection and Law Enforcement:** Multiple law enforcement officers were interviewed from various agencies relating to traffic control and waterway clearance procedures. Every officer was knowledgeable of personal protective equipment available for their use. The officers were proficient in all aspects of personal dosimetry and emergency worker exposure control. Officers were familiar with all established procedures and knew where to direct the public. Water patrol officers from multiple agencies were aware of the waterway clearance plan.

6. **Critical Transportation**: Ocean Reef Public Safety Office staff and the associated staffs from the Academy at Ocean Reef and Reef Club Kids demonstrated the capability to safeguard students and faculty in the event of an emergency at the Turkey Point Nuclear Power Plant. An interview at the school was conducted with key members of the staff with responsibilities to implement the emergency plan. The schools' leadership demonstrated high levels of knowledge and preparedness in implementing precautionary or protective action as they relate to an incident at Turkey Point Nuclear Power Plant.

7. **Public Health, Healthcare, and Emergency Medical Services:** During out of sequence activities, personnel from Miami-Dade Fire Rescue, in conjunction with Baptist Hospital staff, demonstrated they can transport and treat contaminated injured individuals. Placing emergency medical treatment above radiological contamination, they demonstrated the capability to assess, monitor, and decontaminate the patient without delay while treating injuries and preventing cross contamination.

3.2 Jurisdictional Summary Results of Exercise Evaluation

3.3.1 State of Florida

3.3.1.1 Florida State Emergency Operations Center

Operational Coordination Capability Summary:

The Florida Division of Emergency Management leadership and emergency support functions staff successfully demonstrated the ability to conduct operational coordination in support of a radiological emergency at Turkey Point Nuclear Power Plant. The state warning office received and authenticated all notifications from the plant. The state warning point, in turn, effectively notified the Florida Division of Emergency Management; the Florida Department of Health, Bureau of Radiation Control; and the emergency management agencies in the impacted risk counties of Miami-Dade and Monroe. Key personnel were alerted and mobilized in a timely manner using a mass notification system. The state emergency operations center was activated at the appropriate level based on the plant emergency classification level.

Primary communication systems, including a dedicated emergency phone system, were demonstrated without failure, and several alternate systems were available for use as required. Equipment, maps, and displays were sufficient in quantity to support emergency operations and included plume simulations, geographical maps, and computer-based situation logs.

Florida Division of Emergency Management leadership provided efficient direction and control of all support operations as needed. Routine briefings to the staff were conducted after the receipt of emergency classification level changes and as new information was received. Key staff members continuously communicated with state liaisons deployed to the emergency operations facility and county emergency operations centers, maximizing situational awareness throughout the incident.

The Florida State Emergency Response Team Chief conducted a seamless transfer of command and control to the All Hazards Incident Management Team incident commander who, with his team, were deployed to the plant's emergency operations facility in Miami. The leadership and staff at the state emergency operations center were knowledgeable and proactive throughout the exercise. The state emergency management response Team chief effectively used his key staff to ensure information was received

and managed efficiently.

Florida State Law Enforcement operated in a support role to the risk counties of Miami-Dade and Monroe. During this exercise they had a limited role; however, it was identified that they were ready to respond. They were assisted by the Florida Sheriff and Police Association, which can request the assistance of local law enforcement to support when needed by way of a mutual aid agreement.

For this capability the following REP criteria were MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.b.2, and 3.d.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

Public Information and Warning Core Capability Summary:

The state public information officers and staff successfully demonstrated their ability to support public information and warning during an emergency. Public information officers coordinated with the risk counties to ensure media releases were accurate and approved by the state emergency response team chief prior to dissemination to the public. They reviewed and collected all Emergency Alert System messages and ensured rumor control was maintained on both social media and phone inquiries. The state staff was in constant contact with South Florida Public Information Officers through a dedicated public information coordination line. All were knowledgeable of their duties and responsibilities and conducted themselves in a professional manner.

For this capability the following REP criteria were MET: 5.a.1 and 5.b.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.1.2 Florida State All Hazards Incident Management Team

Operational Coordination Capability Summary:

The Florida State All Hazards Incident Management Team effectively demonstrated their ability to manage operations concerning the state response to a simulated incident at the Turkey Point Nuclear Power Plant. The team responded to the utility's emergency operations facility, set up all necessary equipment, and were operational within thirty minutes of arrival. They were immediately self-sufficient, setting up multiple radio and satellite communications systems and their own computer network.

The incident commander was designated as the Governor's Authorized Representative when command was transferred to him. Throughout the exercise, the incident commander maintained regular communications with the state emergency management team in the state emergency operations center. He kept them aware of plant conditions, utility protective action recommendations, and the protective actions decisions made by risk county decision makers.

Miami-Dade and Monroe Counties each provided a liaison to represent their county in the protective action recommendation process coordinated by the Incident Commander at the utility's emergency operations facility. Both liaisons were senior members of their county's emergency management staff.

During the exercise, county liaisons participated in discussions with the utility recovery manager, the Bureau of Radiation Control, and the state incident commander regarding the degrading situation at the plant. They collectively discussed potential protective action recommendations the counties could consider to safeguard the public. The liaisons sought concurrence of the protective action recommendations with their directors at the county emergency operations centers. After obtaining concurrence, the liaisons informed the state incident commander and utility recovery manager of the protective action decisions, sequence of siren sounding, and Emergency Alert System message release. The state incident commander relayed the decisions back to the state emergency response team chief.

The incident commander was familiar with plans and procedures and had immediate access to pertinent information regarding demographic data, relocation and evacuation information, and shelter locations. The All Hazards Incident Management Team provided substantive support to the counties during the process, including monitoring and assisting the counties with unmet needs.

The team perform their duties in a professional manner, thereby ensuring that state and county decision makers were kept up to date with accurate and timely information.

For this capability the following REP criteria were MET: 2.b.1 and 2.b.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.1.3 Florida Department of Health Bureau of Radiation Control

Situational Assessment Capability Summary:

The Department of Health, Bureau of Radiation Control personnel demonstrated the ability to provide staff and to assess radiological, meteorological, and plant conditions in response to a radiological incident at Turkey Point Nuclear Power Plant. The personnel responded promptly when notified of the Alert declaration, staffing emergency support functions at the Turkey Point Nuclear Power Plant Emergency Operations Facility.

The dose assessment team brought all necessary equipment with them to the facility. They had procedures, a portable printer, and laptop computers to run the dose assessment program. The necessary Turkey Point Nuclear Power Plant maps were posted on the walls. The facility and the team had adequate equipment, communications, and supplies to support emergency operations.

The dose assessment team gathered the information on changing plant conditions to properly assess the radiological release. The team performed accurate dose projection calculations and consulted frequently with the utility dose assessors. They promptly provided the dose projection results to the All Hazards Incident Management Team's operations officer. The dose assessment results compared closely with utility dose projections and supported the utility protective action recommendations, county protective action decisions for evacuation, and the decision for emergency workers to ingest potassium iodide.

For this capability the following REP criteria were MET: 1.a.1, 1.d.1, 1.e.1, 2.a.1, and 2.b.1, and 2.b.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

Environmental Response/Health and Safety Capability Summary:

Field Teams Management

Department of Health, Bureau of Radiation Control personnel demonstrated the capability to provide guidance and resources in support of field team operations. Field teams were directed to obtain enough information to help characterize the release and to control radiation exposure.

Two personnel from the Department of Health, Bureau of Radiation Control staffed the position of field team director. The directors reported to the utility's emergency operations facility. In accordance with the extent of play, they were pre-positioned in the area but reported after being notified by their operations officer. The directors had enough supplies and equipment to perform their tasks. A map of the 10-mile emergency planning zone was located next to their work stations and was used to visually display field team locations. A software program was used for tracking field team locations, movements, and survey results. Both directors were very familiar with the software system and all of its capabilities. Communication systems were properly tested and, although there were some equipment failures and difficulties, backup communications were always available and worked correctly.

One field team director set up a timer to ensure field team personnel checked their dosimeters every 30 minutes. The field team directors tracked the dosimeter readings. When instructed by the operations officer, they informed field team personnel to ingest potassium iodide and logged when the teams reported they had simulated ingesting the potassium iodide.

The field team directors kept field teams informed of plant conditions and ensured they were in a proper location to find the plume. Once field teams reported elevated readings, the directors properly instructed the teams to take air samples and relocate to low background areas.

For this capability the following REP criteria were MET: 1.a.1, 1.d.1, 1.e.1, 2.a.1, and 4.a.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

Environmental Response/Health and Safety Capability Summary:

Field Monitoring Teams

Field team personnel from the Florida Department of Health, Bureau of Radiation Control demonstrated the ability to perform their mission to obtain radiological field measurements and samples during a simulated nuclear power plant emergency. The ambient radiation measurements were taken and recorded at locations appropriate with the exercise scenario. The teams also demonstrated the proper collection and transfer of radioiodine and particulate samples.

Procedures were in place to effectively alert, notify, and mobilize the Florida Department of Health, Bureau of Radiation Control radiological field monitoring teams in a timely manner. The field monitoring teams had three communications systems, which were successfully used to maintain communications with the field team supervisor and the field team director. Field monitoring team personnel were equipped with hand-held state law enforcement radio system units, cellular telephones, and satellite radio phones. One of the team's satellite radio phone was found to be inoperable and was replaced with a spare unit prior to departure. Cellular coverage was a concern in the area near the plant but was easily overcome through the use of the radios.

Each field monitoring team consisted of two field operations specialists from the Florida Department of Health, Bureau of Radiation Control. Each team had adequate equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide, and other supplies to support emergency sampling operations. The Bureau of Radiation Control issued appropriate dosimetry, potassium iodide, and procedures and managed radiological exposure to the teams in accordance with those plans and procedures. Team members periodically and at the end of each mission read their dosimeters, recorded the readings, and reported them to the field team director. All dosimetry, survey instruments, and air samplers were within calibration dates and were properly checked to verify operation.

Ambient radiation measurements were made and recorded at appropriate locations, and radioiodine and particulate samples were collected in accordance with procedures. The field monitoring teams moved to an appropriate low background location to determine whether any significant amount of radioactivity had been collected on the sampling media. Each team demonstrated contamination control procedures throughout the exercise. Samples were packaged, labeled, and handled correctly and delivered to the sample drop off location at the end of the exercise.

For this capability the following REP criteria were MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, and 4.a.3.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Not Demonstrated: None

d. Prior Level 2 Findings – Resolved: None

e. Prior Level 2 Findings - Unresolved: None

3.3.2 Miami-Dade County

3.3.2.1 Miami-Dade County Emergency Operations Center

Operational Coordination Capability Summary:

Miami-Dade County emergency management officials successfully demonstrated the ability to respond to a radiological emergency at the Turkey Point Nuclear Power Plant to ensure the safety of the general population and emergency workers. Miami-Dade County was a risk county, with a significant portion of the 10-mile emergency planning zone. The incident commander used an automated electronic notification system to alert the emergency operations center staff in a timely manner. He effectively gathered emergency information, analyzed it, and gave appropriate command direction to the emergency operations center staff. Periodic staff briefings kept the staff informed of emergency conditions and plant status.

The emergency operations center had multiple communication systems available. An electronic incident management system was used to maintain situational awareness and track the status of resource requests. Status calls and discussions among Monroe County and the state concerning protective actions were coordinated using dedicated notification and conference lines. Sufficient equipment and supplies, to include dormitory space for sleeping accommodations, were available for extended operations if required.

Direction and control in Miami-Dade County was provided by the incident commander during this exercise. The planning chief also played a key role in supporting the incident commander. The incident commander reviewed, approved, and authorized all press releases, social media messages, Emergency Alert System messages, and the sounding of sirens. The planning chief led planning meetings and participated in group coordination calls on the conference phone bridge. Together, they demonstrated effective command and control of the incident response within Miami-Dade County and coordination with staff from Monroe County.

Distribution of radiological equipment and potassium iodide to emergency workers occurred in a timely manner. Requests were made for mutual aid to the state for radiological monitoring equipment, dosimeters, decontamination equipment, and civil support teams. Emergency purchase order procedures were implemented for personal protective equipment and supplies to be used in support operations. Emphasis was placed on safety and administrative dose limit for emergency workers.

At the General Emergency declaration, Miami-Dade County used a predetermined decision model to modify the utility's protective action recommendations. The protective action decision was consistent with the evacuation recommendation but added the sheltering of residents in all remaining emergency planning zone areas. Emergency workers were ordered to ingest potassium iodide. These decisions were coordinated with and in concurrence with Monroe County during group coordination calls on the conference bridge.

Decisions were made for groups of persons with disabilities and access/functional needs. Transportation of students from affected schools to host schools was simulated. Notifications were made to special facilities to implement emergency plans. The Miami-Dade County Emergency & Evacuation Assistance Program implemented plans and procedures to relocate vulnerable populations to facilities outside of the affected areas.

As for the management components of those implementations, they were successfully demonstrated in part by Miami-Dade exercise participants assigned to the public safety and human services branches at the county emergency operation center. All activities observed during this exercise were notional and not physically demonstrated.

Precautionary protective actions included; the issuance of appropriate dosimetry; potassium iodide; and procedures to manage radiological exposure of emergency workers. The issuance of potassium iodide for institutionalized individuals and the public was discussed by Miami-Dade County, Monroe County, and state decision makers; it was decided not to issue potassium iodide.

Care for access/functional needs persons included special transportation to the emergency reception center or relocation to health care facilities as warranted by the individual's needs. A registry of access/functional needs persons was maintained the human services branch and updated annually. Transportation resources would be coordinated among schools, public transportation, correction facility transports, and medical transportation. There were 37 schools located within the 10-mile emergency planning zone and each school would be relocated to a host school when instructed by school district leadership. Notional relocation of the schools within zones 4, 5, 6, and 7 was made during this exercise.

Traffic and access control was overseen by the Miami-Dade Sheriff's Office with assistance from several law enforcement entities within the county. There would be over 100 traffic control points located throughout the 10-mile emergency planning zone. These control points would be numbered and broken into streets and turnpikes by zones. Evacuee traffic would be directed west and north from the affected area/zones. Impediments to evacuation would be cleared by local law enforcement. An impediment to evacuation was given via controller inject and remained in place for the duration of the exercise. The public was notified of the impediment and work arounds via social media.

For this capability the following REP criteria were MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, and 3.d.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

Public Information and Warning Capability Summary:

Miami-Dade County Emergency Management, through a coordinated effort with the state and Monroe County, successfully alerted and notified the public of an incident at the Turkey Point Nuclear Power Plant in a timely manner. The primary method for alerting and notifying the public was the simulated use of a series of fixed sirens located throughout the area in Miami-Dade County area within the 10-mile emergency planning zone, followed by the simulated broadcast of an Emergency Alert System messages which provided detailed emergency instructions.

During the exercise, simulated siren activation was successfully demonstrated at each emergency action level change. The decision to activate sirens and the use of the Emergency Alert System was made by the emergency management director in coordination with the state's incident commander and the Monroe County Emergency Management Director. Two simulated siren failures were quickly communicated to the public safety branch director, who coordinated appropriate law enforcement agency action to provide backup route alerting for the areas normally covered by the sirens.

The lead public information officer and supporting staff ensured accurate information was disseminated in the form of the emergency alert messages, news releases, and social media posts. During the exercise, the staff prepared two Emergency Alert System messages, six news releases, and six social media postings. All messaging was consistent with the protective action decisions.

For this capability the following REP criteria were MET: 5.a.1, 5.a.3, and 5.b.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.2.2 Miami-Dade County Traffic Control

On-Scene Security, Protection, and Law Enforcement Capability Summary:

Multiple law enforcement officers were interviewed from Florida City, Homestead, and Cutler Bay Police Departments. The officers were knowledgeable of their traffic control mission. All police vehicles had redundant communications systems capable of communication during emergency situations and inclement weather when land lines might be down and were equipped with public address systems.

Officers stated their vehicles had sufficient equipment that would be used for conducting traffic control. Officers were aware if they needed additional equipment such as, barricades, heavy equipment or signage they could request it from their supervisor.

Each department conducted a radiological safety briefing and issued dosimetry to their officers. The briefing covered use and wear of high and low range pocket dosimetry, permanent record dosimetry, reporting and documenting their dosimetry readings, potassium iodide ingestion, and their individual radiation exposure limits. Additionally, the officers were told where to report at the end of their shift for emergency worker monitoring and decontamination. The briefing ended with a short class on the emergency planning zone evacuation plan.

Each officer was issued equipment and assigned a specific traffic control point. As a group, each department's officers were interviewed relating to traffic control procedures. The officers were knowledgeable of personal protective equipment available for their use and were proficient in all aspects of personal dosimetry issue, wear, reporting values, and frequencies. They were aware of the traffic control plan, communications plan, vehicle removal policy and location of the emergency reception center. It was clear the officers were trained and capable of implementing that plans.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 1.d.1, 1.e.1, 3.a.1, and 3.d.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.2.3 Miami-Dade County Emergency Reception Center

Environmental Response/Health and Safety Capability Summary:

Miami-Dade Emergency Management officials and supporting agencies successfully demonstrated their capability to establish, staff, and operate an emergency reception center for receiving potentially contaminated evacuees. The center was established at Tamiami Park Coral Gables. Reception center staff demonstrated the ability to screen, monitor and, if needed, decontaminate evacuees.

The reception center was set up in accordance with their field operating guide. The park was extremely large and had enough space to provide required parking for clean and contaminated vehicles; 14 lanes of portal monitors; a sheltered staging area; six male and six female dry decontamination stations; portable shower trailers; and a registration area consisting of eight stations. All spaces could expand their capabilities if needed. The center could support the need of the functional and special needs population. Signage was placed at key locations to aid evacuees and emergency workers. Security for the center was provided by Miami-Dade Police Department.

Emergency workers wore minimal protective overgarments to avoid heat related injuries. All emergency workers wore filtered masks and gloves. Additional protective clothing was available if needed. Dosimetry consisted of both high and low scale direct-reading dosimeters and a permanent record dosimeter. Potassium iodide was not issued to workers but would be available on site if needed. The safety officer provided a group safety briefing just before workers were sent to their work stations. The briefing covered basic radiation safety; proper wear of dosimetry; reading and documentation of personal dosimetry; reporting and turnback limits; and real-world weather. Operational briefings were provided at each work station.

A total of 14 portal monitoring instruments were used for initial screening of evacuees. All instruments were assembled and correctly placed into operation, to include the required centerline checks. Handheld survey meters were used to conduct secondary monitoring on evacuees determined to be contaminated during the initial screening. The instruments were within calibration and had range of reading stickers. The number of instruments used was greater than the thirty percent required for demonstration.

Evacuees arriving were directed to parking, provided a briefing, placed on Miami-Dade transit buses, and taken to the sheltered staging area for monitoring. In the staging area they were directed to one of the 14 portal monitors. There were eighty-four evacuees monitored during the evaluation, with six evacuees processed per monitoring station. The rate per station was determined to be one person every 14 seconds, exceeding the requirement of 71 evacuees per minute.

The evacuees were processed in accordance with the local guidelines following all appropriate protocols. The team performed their tasks well and should be proud of their accomplishment.

For this capability the following Radiological Emergency Preparedness criteria were MET: 1.e.1, 3.a.1, and 6.a.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.2.4 Miami-Dade County Fire Rescue Medical Service Drill

Public Health, Healthcare, and Emergency Medical Services Capability Summary:

During the medical services drill for the Miami-Dade Baptist Hospital on December 6, 2018, Miami-Dade County Office of Emergency Management and Miami-Dade Fire Rescue Services staffs demonstrated they had sufficient medical resources, equipment, supplies, and trained personnel to provide medical services and transportation of multiple contaminated injured patients to support a radiological incident at the Turkey Point Nuclear Power Plant.

A Miami-Dade hazardous materials officer provided a radiological safety briefing to four Miami-Dade Fire Rescue paramedics. The radiological safety briefing included a situation update on the simulated release from the plant; personal protective equipment to be worn; how to read their personal dosimetry; and how to record those readings every 30 minutes. They were told to report the readings on their dosimetry every six hours to the officer, or immediately if the readings reached the administrative dose of 100 mR or the 500 mR turnback value. They were told where to report for monitoring and possible decontamination once the mission ended, and to return equipment and forms to the hazardous materials officer upon completion of emergency worker monitoring and decontamination.

Following the safety briefing, paramedics donned personal protective equipment that included a filtered face mask, protective sleeve garb, double latex gloves, and safety glasses. The ambulance was prepared with the placement of a radiological waste bag and excess ambulance equipment and supplies were moved into storage areas or cabinetry.

Per the plan, the team does not monitor patients; they treat all patients as if they were contaminated. During the exercise, they demonstrated contamination control by properly cocooning each patient, performing frequent glove changes, and disposing of waste materials.

During this exercise, they transported and provided medical care for four contaminated patients. The patients were all transported from Tamiami Park, an emergency reception center, to the hospital. A MedCom communications check with the hospital was made at the beginning of the drill to demonstrate that capability. To reduce the volume of calls on that emergency system, all other calls were over individual cellular phones. Communications for each patient response provided the hospital staff with patient medical information, the expected arrival times and when available contamination levels received from the reception center staff. They provided enough information for the hospital to properly prepare for a contaminated injured patient.

Transfer of the patients by the ambulance crew to hospital staff was flawless, starting with a briefing on the patients' conditions to the safe physical transfer of the patient.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 1.e.1, 3.a.1, and 6.d.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.2.5 Miami-Dade Baptist Hospital Medical Service Drill

Public Health, Healthcare, and Emergency Medical Services Capability Summary:

The Miami-Dade County Office of Emergency Management, Miami-Dade Fire Rescue and Baptist Hospital staffs demonstrated they had abundant medical resources, equipment, supplies, and trained responders to provide lifesaving medical services to multiple contaminated injured patients in support of a radiological incident at the Turkey Point Nuclear Power Plant.

The drill scenario began with the Turkey Point Nuclear Power Plant being at a General Emergency. The county elected officials had ordered an evacuation of several zones near the plant and had established their emergency reception center. The hospitals had been alerted to these conditions and were in the process of setting up their radiological emergency areas.

In preparation, all response equipment was rolled out of storage and inspected. The designated ambulance arrival area of the radiological emergency area was cordoned off from other arrival areas by rope barriers with radiation area signs. The ground was covered with plastic tarps which were taped down. Signage and posters designed as worker aids were placed throughout the area. Inside, the designated emergency room was prepared by removing unnecessary equipment, stocking expendables needed for patient decontamination, and medical supplies for patient treatment. Posters and signage were also placed in the room for worker aids. The room was set up to support two patients simultaneously. Supplies, equipment, and work space were adequate for the mission.

A radiological safety briefing was provided by the doctor since most team members were conducting setup and preparation. He covered decontamination action levels of two times background, proper wear of dosimetry, and reporting and recording actions for direct-reading dosimeters. Workers were told they could receive up to 400 millirem for this mission. Permanent record dosimetry was also explained. Protective clothing was described, and all were reminded there were donning and doffing poster boards for reference. Individual assignments were reviewed, and he stressed that medical emergencies had priority over decontamination.

The charge nurse received a call from Miami-Dade Fire Rescue #14 that they were in route to a possibly radiologically contaminated patient at Tamiami Park, one of the county emergency reception centers. This call triggered her to announce "Code Decon" over the hospital public address system, which would have caused the team to respond.

The team dressed out in protective coveralls with hoods, surgical mask with shield, two pair of surgical gloves, and booties. They donned together with one person reading the donning poster and all checking one another. All dosimetry was properly documented to the user on a master dosimeter log.

Three portable radiation monitoring instruments were properly placed into operation. All were within calibration dates and operated within the range of readings stickers attached. The final step was to obtain background readings in the locations that each instrument was to be used. That number was recorded on a prominent white board at each location.

The charge nurse received a call from Rescue #14 stating they were in route to the hospital with a radiologically contaminated patient, provided the medical condition of the patient, and stated they were approximately 20 minutes out. The team reviewed their plan for receiving the patient, reviewed actions to limit the spread of contamination, and went out to meet the ambulance. Another call was received from Rescue #14 providing a patient medical update and provided contamination levels of up to 4,400 counts per minute on the patient.

The ambulance arrived and offloaded the gurney with patient. The hospital crew met them, and the paramedics provided a medical information briefing. The patient was slid from one gurney to the other. Immediately, the hospital nurse uncovered the patient and started conducting a medical survey; the patient was determined to be stable and was rolled into the decontamination room. All gloves were changed.

Once inside, the patients clothing was cut off and properly removed. While she was rolled on her side, her backside was monitored for additional injuries and radiological contamination. Gloves were again changed. On her back again, the wound on her head was monitored, decontaminated, and monitored again as clean. Precautions were taken to control water runoff during decontamination.

The patient's entire body was monitored using proper techniques. Swabs were taken from the mouth, nostrils, and ears, and labeled and processed out of the decontamination area for evaluation. Bandages removed from wounds were also bagged and processed for analysis. Several areas on the body were contaminated above the action level for decontamination and were decontaminated using damp cloths. All contamination levels were reduced to below twice background. Before releasing the patient to the general emergency area, a final whole-body monitoring was completed. The patient was transferred out of the decontamination room to the clean area for further medical attention. This was the first of four patients processed for the drill, one being wheel chair bound. All remaining patients were processed in a similar manner. The team doctor was never required to step into the decontamination room, but he maintained complete control of the operation from only steps away in a clean area. The team read their dosimeters every thirty minutes as requested by the recorder. Glove changes were frequent, and the monitoring techniques used were excellent.

One team member performed doffing procedures, using the doffing poster as a reference. One member read the procedures on the poster as the other performed the step. The process went smoothly. Individual dosimetry was removed, read, and monitored for possible contamination before being handed across to the clean side. When all protective clothing was removed and placed in marked containers, the emergency worker was monitored. As the final step, the sole of each foot was monitored as she stepped out into the clean area.

This was a challenging exercise which was performed in an exemplary manner by a well-trained hospital staff.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 1.e.1, 3.a.1, and 6.d.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Not Demonstrated: None

d. Prior Level 2 Findings – Resolved: None

e. Prior Level 2 Findings - Unresolved: None

3.3.3 Monroe County

3.3.3.1 Monroe County Emergency Operations Center

Operational Coordination Capability Summary:

Monroe County Emergency Management staff successfully demonstrated the ability to respond to a radiological emergency at the Turkey Point Nuclear Power Plant to ensure the safety of their population and responding emergency workers. The Monroe County Emergency Operations Center staff members were prepositioned in accordance with the extent of play agreement. Following the declaration of a Notification of Unusual Event by the utility, a Monroe County Sheriff's Office dispatcher telephoned the emergency management director and radiological emergency preparedness administrator. They notified other emergency management staff members to respond. Following the declaration of an Alert, other agencies representatives were notified to respond.

The emergency operations center had sufficient equipment and supplies to support emergency response operations. Staff used landline telephones, cellular telephones, and email to communicate with personnel at the emergency operations facility and outside agencies. Handheld radios and a satellite telephone were available if needed. Staff used a management software system to track resource requests. The Monroe County Emergency Management Director and the Radiological Emergency Preparedness Administrator demonstrated excellent direction and control of the county emergency operations center in response to a simulated radiological incident at the Turkey Point Nuclear Power Plant. The director, administrator, and staff at the emergency operations facility worked closely on protective action decisions following the declarations of Site Area Emergency and General Emergency. The emergency operations center staff received a constant up-to-date flow of information from the emergency management director and the radiological emergency preparedness administrator. The emergency operations center staff also provided the most current status of individual response actions for a complete operational picture of the situation.

The Radiological Emergency Preparedness Administrator successfully explained the exposure control process. Protective action recommendations were discussed by the offsite response organizations with consideration of relevant factors. The discussions resulted in appropriate and timely protective action decisions to notify the general public of the plant status, to issue potassium iodide to emergency workers, and not to issue potassium iodide to the public. The potassium iodide decisions were based on plant

conditions and information as it became available. Ocean Reef was prepared to notify the special needs population via text messages for evacuation to the Key Largo Elementary School. The access/functional needs population was pre-identified with annual notification forms submitted to Monroe County Emergency Management.

The Radiological Emergency Preparedness Administrator was knowledgeable of appropriate dosimetry, potassium iodide, record-keeping, and procedures to ensure safe radiological exposure of emergency workers performing emergency operations. The Monroe County School District representative clearly described procedures to implement protective actions to ensure the safety of Ocean Reef students and staff during relocation. The Ocean Reef Public Safety liaison and Florida Department of Health representative discussed protective action procedures for the Ocean Reef access/functional needs population should evacuation orders be implemented. All staff members were knowledgeable and utilized current county plans and procedures to ensure the safety of the public and emergency workers.

Due to the wind direction during the emergency, Ocean Reef was not evacuated, and traffic controls were not necessary in Monroe County. Law enforcement representatives described appropriate traffic management procedures if conditions changed. United States Coast Guard and Florida Fish and Wildlife Commission representatives coordinated to manage marine blockades.

For this capability the following REP criteria were MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, and 3.d.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

Public Information and Warning Core Capability Summary:

Monroe County public information staff successfully demonstrated emergency public information and warning in support of the Turkey Point Nuclear Power Plant. Emergency operations center staff coordinated and provided accurate actionable information to the public in a timely manner. County staff at the joint information center and emergency operations center worked closely to develop appropriate public messaging.

The county public information officer at the joint information center drafted Emergency Alert System messages and press releases and forwarded these to the emergency management director at the emergency operations center for approval. Once approved, the Emergency Alert System messages were transmitted to broadcasters using a computer system operated by the public information liaison in the emergency operations center. Approved press releases were emailed to media outlets. A total of three Emergency Alert System messages and five press releases were distributed.

Press releases and Emergency Alert System messages were provided to the Ocean Reef Public Safety liaison at the emergency operations center, who forwarded the information to the Ocean Reef Public Safety chief. The liaison explained that since there were no sirens in Ocean Reef, the public would be notified of the emergency through route alerting using eight vehicles and public messaging. Ocean Reef public safety demonstrated the process of route alerting during out of sequence. This small private community maintains close ties to all of the residents. Emergency information would be broadcast on the community's closed cable television network, and by using a reverse calling system to notify residents.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 5.a.1, 5.a.3, and 5.b.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.3.2 Monroe County Traffic Control

On-Scene Security, Protection, and Law Enforcement Capability Summary:

Two safety officers from Ocean Reef Community were interviewed relating to traffic control for an incident at the Turkey Point Nuclear Power Plant. The officers were familiar with dosimetry and radiological exposure control procedures. They demonstrated zeroing, recording, and wearing of direct-reading dosimeters and understood administrative reporting and turnback values. They knew the proper wear of permanent record dosimeters, and how and when to consume potassium iodide if directed. Each officer knew the location of the emergency reception center their residents would use and where to report at the end of their shift.

The safety office had numerous vehicles ranging from golf carts to sport utility vehicles. All vehicles licensed for road use were equipped with two-way radio systems and public address systems with warning lights. The officers were equipped with cellular phones

and hand-held radios. These vehicles also had traffic cones, flares, and reflective vests and gloves for directing traffic. If additional materials were needed, they knew to make a request through their dispatcher.

There were no predesignated traffic control points in Ocean Reef Community other than the main access gate. Ocean Reef was a small private community and consideration of additional control points are being discussed. Their main mission would be public safety and security, assisting when and where needed.

Monroe County would provide the Ocean Reef safety office with adequate numbers of high range and low range direct-read dosimetry with chargers, permanent-record dosimetry, potassium iodide pills, hand held survey meters, and the required maintenance support and training. The Ocean Reef staff was trained and capable of performing traffic control and safety related activities in a radioactively contaminated environment.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 1.e.1, 3.a.1, 3.d.1.

a. **Level 1 Finding:** None
b. **Level 2 Finding:** None
c. **Not Demonstrated:** None
d. **Prior Level 2 Findings – Resolved:** None
e. **Prior Level 2 Findings - Unresolved:** None

3.3.3.3 Monroe County Schools

Critical Transportation Capability Summary: Critical Transportation

Staffs from the Ocean Reef Public Safety Office, the Academy at Ocean Reef, and the Reef Club Kids demonstrated the capability to safeguard students and faculty in the event of an emergency at Turkey Point Nuclear Power Plant. This evaluation was conducted by interview at the school. The school's leadership demonstrated high levels of knowledge and preparedness in implementing precautionary or protective actions in the event of an incident at Turkey Point Nuclear Power Plant.

During emergencies, the Ocean Reef Public Safety Office Director would notify the schools at the Alert emergency classification level. This would allow the school staff to adequately prepare and safeguard the students and faculty.

The schools would have access, through signed agreements, to an adequate number of buses to transport all students and faculty to the emergency reception center/reunification center at Key Largo Elementary School. Parents of students would have signed a release statement authorizing the schools to implement this process should it be required. School

staffs would have the ability to notify parents through reverse calling systems and the community television station, as well as other public broadcasting systems if required. Should relocation be required, the school staff would stay with students until everyone was reunified with their family or authorized care provider.

The schools practice annual emergency drills such as school lockdowns, severe weather response, and relocation. Through discussion, the staffs demonstrated their knowledge of protective actions to relocate and shelter in place, and precautionary actions of school early closure or early dismissal. The schools had effective emergency plans that are reviewed and exercised annually. Ocean Reef Public Safety and the Ocean Reef private schools had an effective program to provide protective actions for their students and faculty.

For this capability, the following Radiological Emergency Preparedness criterion was MET: 3.c.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

3.3.4 Joint Operations

3.3.4.1 Joint Information Center

Public Information and Warning Capability Summary:

Public information officers and staff from the State of Florida and Miami-Dade and Monroe Counties coordinated to deliver prompt information to the public. They developed and disseminated timely emergency public information in response to a simulated emergency at the Turkey Point Nuclear Power Plant.

The joint information center, referred to as the emergency news center, was activated expeditiously, consistent with established procedures following the Alert declaration by the utility. In accordance with the extent of play agreement, pre-positioned state and county public information officers and support staff reported after receiving notifications in accordance with plans and procedures.

The emergency news center was comprised of three separate areas adjacent to the utility's emergency operations facility – administrative, operations, and media briefing rooms. The operations room was able to accommodate all necessary jurisdictions, and had ample supplies, equipment, and displays to support public information activities. Redundant

communications capabilities were available and operated without failure. There was an individual on hand from the state's All Hazards Incident Management Team to assist with technical issues. The media briefing room projector encountered technical difficulties, and maps were not displayed during the second media briefing to provide a visual aid regarding evacuating areas. Further, media packets were not available.

The process for preparing and distributing press releases varied among the agencies in accordance with their plans and procedures. Coordination with their respective jurisdictions and among the public information representatives within the emergency news center was excellent. Though the releases were coordinated prior to release, separate releases were disseminated for each jurisdiction.

There were seventeen press releases distributed within the emergency news center. All published products contained timely information encompassing the essential elements required by prescribing directives. The final news release disseminated by Miami-Dade County contained information regarding shelter in place for emergency planning areas 3, 7, 8 & 9 and evacuation for planning areas 2, 4, 5 & 6, which was not discussed prior to addressing the media during media briefing two.

The emergency news center staff participated in two formal media briefings following the siren activation in correlation with Site Area Emergency and General Emergency declarations. Both briefings were presented in English; this was attributed to the fact that no Spanish speaking individuals were in the audience.

During media briefing two, the Miami-Dade public information spokesperson failed to provide the emergency planning areas directed to shelter in place in accordance with the protective action decisions. Further, the spokesperson stated twice that those individuals residing outside of the areas directed to evacuate were "completely safe". This was in contradiction to the news release distributed by the county and could have adversely affected the public within emergency planning areas 3, 7, 8 & 9. Also, the briefing did not include information regarding: boat traffic being diverted; farmers sheltering animals and providing stored feed; evacuees to report to the reception center at Tamiami Park; and pet information. These exercise demonstrations were attributed to exercise artificiality and time constraints.

Public inquiry and rumor control functions, as well as postings to jurisdictional social media outlets, were conducted within each jurisdiction's emergency operations center.

For this capability, the following Radiological Emergency Preparedness criteria were MET: 1.a.1, 1.d.1, 1.e.1, and 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Not Demonstrated: None

d. Prior Level 2 Findings – Resolved: None

e. Prior Level 2 Findings - Unresolved: None

3.3.4.2 Emergency Operations Facility

Operational Coordination Summary

The Florida Power and Light Emergency Response Organization staff activated the emergency operations facility in an effective manner. Once activated, they took the lead for making all notifications to the state and the counties and, if required, the development of protective action recommendations. Prior to that, all notifications were made from the Turkey Point Nuclear Power Plant control room.

At Alert, the State Emergency Response Team, located in the state emergency operations center in Tallahassee, deployed an All Hazards Incident Management Team under the leadership of a senior State Emergency Response Team Manager designated as the incident commander for the state. The incident commander was also designated as the Governor's Authorized Representative.

The Bureau of Radiation Control Operations Officer in the facility maintained overall direction and control of the Bureau's response effort. He also provided sound technical advice and recommendations to the incident commanders and to the decision makers from the risk counties.

The incident commander and the county liaison received regular update briefings regarding plant conditions from the utility's recovery manager, and in turn, provided the utility with summaries of their respective county responses to the emergency.

The recovery manager briefed the utility's protective action recommendations to the state and county representatives in the facility. The Bureau of Radiation Control Operations Officer provided a technically sound assessment of the utility's protective action recommendation to the incident commander and to the county liaisons in clear understandable language. After obtaining the concurrence from their directors, the liaisons informed the incident commander and recovery manager of the protective action decisions made by the directors and times of siren activation and emergency action message release.

Representatives from Bureau of Radiation Control and the utility recovery manager were observed performing their duties in a professional manner, thereby ensuring that state and county decision makers were provided up to date, accurate, and timely information.

For this capability the following REP criteria were MET: 1.c.1, 2.b.1 and 2.b.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Not Demonstrated:** None

d. **Prior Level 2 Findings – Resolved:** None

e. **Prior Level 2 Findings - Unresolved:** None

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Section 4: Conclusion

Officials and representatives from the State of Florida; the risk counties of Miami-Dade and Monroe; Florida Power and Light; the Nuclear Regulatory Commission; and numerous other organizations participated in this exercise. The cooperation and teamwork of the participants was evident throughout all phases of the exercise. The Federal Emergency Management Agency wishes to acknowledge the efforts of the many individuals who participated and made this exercise a success. State and local emergency response organizations demonstrated knowledge of their emergency response plans and procedures and successfully implemented them to protect the health and safety of the public.

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Appendix A: Exercise Timeline

Emergency Classification Level or Event	Time Utility Declared	Time That Notification Was Received or Action Was Taken					
		FL-SEOC	FL AHIMT	FL DOH BRC	JIC	MIAMI DADE COUNTY EOC	MONROE COUNTY EOC
Unusual Event	0822	0842	N/A		0835	0835	0835
Alert	0857	0908	N/A	0907	0907	0909	0907
Site Area Emergency	1002	1007	1007	1007	1007	1007	1007
General Emergency	1127	1137	1137	1137	1137	1137	1137
Simulated Rad. Release Started	1120	1137	1137	1137	1137	1137	1137
Simulated Rad. Release Terminated	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
Facility Declared Operational		0916	1032	0946	1015	0925	0857
Declaration of State of Emergency State		0931	0931	N/A	1002	0931	0949
Local					1022 M / 1000 MD	1000	1022
Exercise Terminated		1238	1223	1232	1245	1226	1223
Precautionary Action:							
1st Siren Activation		1032	1032		1032	1032	1032
1st EAS Message: #2 / PR 3 & 5			1032		1032	1032	1032
1st Protective Action Decision: Evacuate Areas 2, 4, 5, & 6, Shelter, Areas 7, 8, & 9		1210	1153		1153	1153	1153
2nd Siren Activation			1205		1205	1205	1205
2nd EAS Message: MDC: #3, MC: #3, 10 / PR 6, 7			1205		1205	1205	1205
KI Decision: EWs (yes)		1210	1132 (FMT)	1132 (FMT)	1153	1153	1153
KI Decision: Public (none)			1153	1153	1153	1153	1153

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Appendix B: Exercise Evaluators and Team Leaders

Regional Assistance Committee Chair: Randall Hecht

Section Chief: Robert Spence **Site Specialist**: Walt Cushman

Location	Evaluation Team	Capability & Activity
Joint Operations		
JIC	Elisabeth Adkins	Public Information & Warning
EOF	John Pelchat	Situational Assessment
State of Florida Director: Jared Moskowitz		
SEOC - Tallahassee	Quintin Ivy Lorenzo Lewis	Operational Coordination Public Information & Warning
AHIMT	Walt Cushman	Operational Coordination
Dose Assessment	Jill Leatherman (ICF)	Situational Assessment
Field Team Management	Joe Harworth	Environmental Response/Health & Safety
Field Monitoring Team 1	Bart Ray (ICF)	Environmental Response/Health & Safety
Field Monitoring Team 2	Jim Hickey (ICF)	Environmental Response/Health & Safety
Risk Counties		
Miami- Dade County Director: Frank Rollason		
EOC	Glenda Bryson Mike Dolder J.T. Ackerman	Operational Coordination, On Scene Security & Protection, Public Information & Warning
(OOS) December 6, 2018 Cutler Bay Police Department, Florida City Police Department, Homestead Police Department	Walt Cushman	On Scene Security and Protection
Reception Center (OOS) 1300 March 13 @ Tamiami Park, 11201 SW 24th Street, Coral Gables	W Cushman R Smith M Dalton B McRee M Giani M Campbell	Environmental Response/Health & Safety
Monroe County Director: Martin Senterfit		
EOC	Gerald McLemore John Fill	Operational Coordination Public Information & Warning On Scene Security & Protection
Ocean Reef Community (OOS) March 6	Walt Cushman	Public Information & Warning On Scene Security and Protection

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Appendix C: Extent of Play Agreements

Florida State
Division of Emergency Management
Extent of Play Agreement
Turkey Point

PLUME PHASE FULL PARTICIPATION RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE

All activities will be demonstrated fully in accordance with respective plans and procedures as they would be in an actual emergency (FEMA must receive these plans, guides and procedures NLT 60 days before the exercise). This Extent of Play agreement is written by exception. If it is not listed as an exception it will be demonstrated as described in the plans, standard operating guides (SOGs) and/or procedures (SOPs). Any issue or discrepancy arising during exercise play may be re- demonstrated if allowed by the RAC Chair or as listed herein. This allowance may be granted if it is not disruptive to exercise play and is mutually agreed to by the ORO controller and FEMA evaluator.

Core Capability: Operational Coordination

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

Capability Target: Emergency Operations Management Performance Measure:

Critical Task: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner (NUREG-0654 A.1.a, e; A.3, 4; C.1, 4, 6; D.4; E.1, 2; G.3.a-i H.3, 4; Criterion 1a1). Pg. 180.

Performance Measure: (1) OROs must demonstrate the capability to receive notification of an incident from the licensee; (2) verify the notification, (3) contact, alert, and mobilize key emergency personnel in a timely manner, (4) Responders must demonstrate the ability to receive and/or initiate notification to the licensees or other respective emergency management organizations of an incident in a timely manner when they receive information. (5) Demonstrate the ability to maintain and staff 24-hour operations. (6) OROs must demonstrate the activation of facilities for immediate use by mobilized personnel upon their arrival.(7) The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP. (8) The ability to identify and request additional resources or identify compensatory measures must be demonstrated.

Concur, the State Watch Office will make appropriate notifications and the AHIMT will

respond to the EOF located at 9300 West Flagler Street, Miami, Fl.

Critical Task: At least 2 communications systems are available, at least 1 operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.1, 2; Criterion 1d1). Pg. 181.

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations. (4) OROs must ensure that a coordinated communication link for fixed and mobile medical support facilities exists.

Concur, the AHIMT will communicate with the SEOC. Florida Division of Emergency Management will not demonstrate #4

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H.7, 10; I.7, 8, 9; J.10.a, b, e; J.11, 12; K.3.a; K.5.b; Criterion 1e1). Pg. 182.

Performance Measure: (1) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (4) 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.

Concur, the AHIMT will display maps at the EOF and the monitoring instruments, dosimetry and KI are housed at the SEOC on the 3rd floor, REP Technician at the SEOC can provide an updated inventory.

Capability Target: Precautionary and/or Protective Action Decision Making Performance Measure:

Critical Task: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible (NUREG-0654 A.1.d; A.2.a, b; A.3; C.4, 6; Criterion 1c1). Pg. 181.

Performance Measure: (1) Leadership personnel must demonstrate the ability to carry out the essential management functions of the response effort (e.g., keeping staff informed through periodic briefings and/or other means, coordinating with other OROs, and ensuring completion of requirements and requests.) (2) Leadership must demonstrate the ability to prioritize resource tasking and replace/supplement resources (e.g., through MOUs or other agreements) when faced with competing demands for finite resources. Any resources identified through LOA/MOUs must be on the ORO's mobilization list so they may be contacted during an incident if needed.

> Concur, the SERT Chief will deploy the AHIMT and transfer Command and Control to the AHIMT Incident Commander after the Site Area Emergency.

Critical Task: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make PADs for the general public (including the recommendation for the use of KI, if ORO policy) (NUREG-0654 A.3; C.4, 6; D.4; J.9; J.10.e.f, m Criterion 2b2). Pg. 185.

Performance Measure: (1) OROs must have the capability to make both initial and subsequent precautionary and/or protective action decisions. in a timely manner appropriate to the incident, based on information from the licensee, assessment of plant status and potential or actual releases, other available information related to the incident, input from appropriate ORO authorities (e.g., incident command), and PARs from the utility and ORO staff. (2) In addition, a subsequent or alternate precautionary and/or protective action decision may be appropriate if various conditions (e.g., an HAB incident, weather, release timing and magnitude) pose undue risk to an evacuation or if evacuation may disrupt the efforts to respond to a hostile action.(3) OROs must demonstrate the ability to obtain supplemental resources (e.g., mutual aid) necessary to implement a precautionary and/or protective action decision if local law enforcement, fire service, HAZMAT, and emergency medical resources are used to augment response to the NPP site or other key infrastructure. (4) If the ORO has determined that KI will be used as a protective measure for the general public under offsite plans/procedures, then it must demonstrate the capability to make decisions on the distribution and administration of KI to supplement sheltering and evacuation. This decision must be based on the ORO's plans/procedures or projected thyroid dose compared with the established PAG for KI administration. The KI decision-making process must involve close coordination with appropriate assessment and decision-making staff. (5) If more than one ORO is involved in decision making, all appropriate OROs must communicate and coordinate precautionary and/or protective action decisions with each other.(6) In addition, decisions must be coordinated/ communicated with incident command. OROs must demonstrate the capability to communicate the results of decisions to all the affected locations.

This is a County function and the AHIMT will only support this.

Capability Target: Protective Action Implementation

Performance Measure: (State coordination of USCG/ATC/Rail)

Critical Task: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel (NUREG-0654 A.3; C.1, 4; J.10.g, j; Criterion 3d1) Pg. 191-192.

Performance Measures: (1) OROs must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and PADs (e.g., evacuating, sheltering, and relocation) in a timely manner. (2) In instances where OROs lack authority necessary to control access by certain types of traffic (e.g., rail, water, and air traffic), they must demonstrate the capability to contact the State or Federal agencies that have the needed authority.

This is a County function and the AHIMT and SEOC will only support this.

Core Capability: Operational Communications

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

Capability Target: Emergency Operations Management Performance Measure:

Critical Task: At least 2 communications systems are available, at least 1 operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.1, 2; Criterion 1d1). Pg. 180.

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations. (4) OROs must ensure that a coordinated communication link for fixed and mobile medical support facilities exists.

Concur, the AHIMT and SEOC will work in conjunction to ensure all messages are handled without delays. The Florida Division of Emergency Management will not demonstrate #4.

Core Capability: Public Information and Warning JIC/JIS/ ENC

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

Capability Target: Emergency Notification and Public Information Performance Measure:

Critical Task: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner (NUREG-0654 A.1.a, e; A.3, 4; C.1, 4, 6; D.4; E.1, 2; G.3.a; H.3, 4; Criterion 1a1). Pg. 180.

Performance Measure: (1) OROs must demonstrate the capability to contact, alert, and mobilize key emergency personnel in a timely manner, (2) Demonstrate the ability to maintain and staff 24-hour operations. (3) OROs must demonstrate the activation of facilities for immediate use by mobilized personnel upon their arrival.(4) The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP. (5) The ability to identify and request additional resources or identify compensatory measures must be demonstrated.

> Concur, the AHIMT and the SEOC will work together to ensure all notifications are made in a timely manner.

Critical Task: At least 2 communications systems are available, at least 1 operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.1, 2; Criterion 1d1). Pg. 180.

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations.

> Concur, the AHIMT and the SEOC will maintain communications utilizing multiple methods to include landline, cellular and email.

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H.7, 10; I.7, 8, 9; J.10.a, b, e; J.11, 12; K.3.a; K.5.b; Criterion 1e1). Pg. 182.

Performance Measure: (1) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role.

Concur, the REP Tech at the SEOC can provide an updated inventory of the quantities and maintenance thereof.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J.10.k; Criterion 3d2). Pg. 192.

Performance Measures: (1) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations. (2) , The impediment must remain in place during the evacuation long enough that re-routing of traffic is required and **(3)** must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees**.**

This is a County Function and the AHIMT will only support this.

Critical Task: Ensure OROs provide accurate emergency information and instructions to the public and the news media in a timely manner (The responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay) (NUREG0654 E.5, 7; G.3.a; G.4.a, c; Criterion 5b1). Pg. 200-201.

Performance Measure: (1) The responsible ORO personnel/representatives must demonstrate actions to provide emergency information and instructions to the public and media in a timely manner following the initial alert and notification (not subject to specific time requirements). For exercise purposes, timely is defined as "with a sense of urgency and without undue delay". Message elements: (2) The ORO must ensure that emergency information and instructions are consistent with PADs made by appropriate officials. (3) The emergency information must contain all necessary and applicable instructions (e.g., evacuation instructions, evacuation routes, reception center locations, what to take when evacuating, shelter-in-place instructions, information concerning protective actions for schools and persons with disabilities and access/functional needs, and public inquiry hotline telephone number) to assist the public in carrying out the PADs provided (4) The ORO must also be prepared to disclose and explain the ECL of the incident. At a minimum, this information must be included in media briefings and/or media releases. (5) OROs must demonstrate the capability to use language that is clear and understandable to the public within both the plume and ingestion exposure pathway EPZs. (6) This includes demonstration of the capability to use familiar landmarks and boundaries to describe protective action areas. (7) The emergency information must be all-inclusive by including the four items specified under exercise Demonstration Criterion 5.a.1 and previously identified protective action areas that are still valid, as well as new areas. (8) Information about any rerouting of evacuation routes due to impediments should also be included. (9) The OROs must demonstrate the capability to ensure that emergency information that is no longer valid is

rescinded and not repeated by broadcast media. (10) OROs must demonstrate the capability to ensure that current emergency information is repeated at pre-established intervals in accordance with the plans/procedures. (11) OROs must demonstrate the capability to develop emergency information in a non-English language when required by the plans/procedures. **(12)** If ingestion exposure pathway measures are required, OROs must demonstrate that a system exists for rapid dissemination of ingestion exposure pathway information to predetermined individuals and businesses. Media information: (13) OROs must demonstrate the capability to provide timely, accurate, concise, and coordinated information to the news media for subsequent dissemination to the public. (14) This would include demonstration of the capability to conduct timely and pertinent media briefings and distribute media releases as the incident warrants. (15) The OROs must demonstrate the capability to respond appropriately to inquiries from the news media. (16) All information presented in media briefings and releases must be consistent with PADs and other emergency information provided to the public. (17) Copies of pertinent emergency information (e.g., EAS messages and media releases) and media information kits must be available for dissemination to the media. Public Inquiry (18) OROs must demonstrate that an effective system is in place for dealing with calls received via the public inquiry hotline. (19) Hotline staff must demonstrate the capability to provide or obtain accurate information for callers or refer them to an appropriate information source. (20) Information from the hotline staff, including information that corrects false or inaccurate information when trends are noted, must be included, as appropriate, in emergency information provided to the public, media briefings, and/or media releases. HAB considerations: (21) The dissemination of information dealing with specific aspects of NPP security capabilities, actual or perceived adversarial (terrorist) force or threat, and tactical law enforcement response must be coordinated/ communicated with appropriate security authorities (e.g., law enforcement and NPP security agencies) in accordance with ORO Pans/procedures.

Concur, the PIO at the JIC will coordinate with other Agencies to ensure the emergency information and the instructions to the public are identical and are provided in a timely manner. Florida Division of Emergency Management will not demonstrate #12 and #20

Approved: Margaret Giani, 12/12/18

Florida State
Bureau of Radiation Control
Extent of Play Agreement
Turkey Point

PLUME PHASE FULL PARTICIPATION RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE

All activities will be demonstrated fully in accordance with respective plans and procedures as they would be in an actual emergency (FEMA must receive these plans, guides and procedures NLT 60 days before the exercise). This Extent of Play agreement is written by exception. If it is not listed as an exception it will be demonstrated as described in the plans, standard operating guides (SOGs) and/or procedures (SOPs). Any issue or discrepancy arising during exercise play may be re-demonstrated if allowed by the RAC Chair or as listed herein. This allowance may be granted if it is not disruptive to exercise play and is mutually agreed to by the ORO controller and FEMA evaluator.

Core Capability: Situational Assessment - Dose, Field Team Management

Definition: Provide all decision makers with decision-relevant information regarding the nature and extent of the hazard, any cascading effects, and the status of the response.
Capability Target: Radiological Assessment, Protective Action Recommendations, and Precautionary and/or Protective Action Decisions for the Plume Phase of the Emergency
Performance Measure:

Critical Task: Appropriate protective action recommendations (PARs) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions. (NUREG-0654/FEMA-REP-1, 1.10 and Supplement 3; Criterion 2.b.1) Pg. 184-185.

Performance Measures: (1) The ORO must demonstrate the capability to use the appropriate means described in the plans/procedures to develop PARS for decision-makers based on available information and recommendations provided by the licensee, as well as field monitoring data if available. Workers must also consider any release and meteorological data provided by the licensee. (2) The ORO must demonstrate a reliable capability to independently validate dose projections. The types of calculations to be demonstrated depend on the data available and the need for assessments to support the PARs must be appropriate to the scenario.

In all cases, calculation of projected dose must be demonstrated. Projected doses must be related to quantities and units of the PAG to which they will be compared. (3) PARs must be promptly transmitted to decision-makers in a prearranged format. (4) When the licensee and ORO projected doses differ by more than a factor of 10, the ORO and licensee must determine the source of the difference by discussing input data and assumptions, using different models, or exploring possible reasons. Resolution of these differences must be incorporated into the PARs

if timely and appropriate.(5) The ORO must demonstrate the capability to use any additional data to refine projected doses and exposure rates and revise the associated PARs.

(Agree)

Core Capability: Environmental Response/Health and Safety

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

Capability Target: Field Measurement and Analysis Performance Measure:

Critical Task: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner (NUREG-0654 A. 1 .a, e; A.3, 4; C. 1, 4, 6; D.4; E.I, 2; G.a.3; H.3, 4; Criterion lal). Pg. 180.

Performance Measure: (1) OROs must demonstrate the capability to, (2) contact, alert, and mobilize key emergency personnel in a timely manner, (3) Demonstrate the ability to maintain and staff 24-hour operations. (4) OROs must demonstrate the activation of facilities for immediate use by mobilized personnel upon their arrival.(5) The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP. (6) The ability to identify and request additional resources or identify compensatory measures must be demonstrated. Personnel will be prepositioned on the lower level of the EOF.

Critical Task: At least 2 communications systems are available, at least I operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.l, 2; Criterion Idl). Pg. 181

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations.

(Agree)

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. 10.a, b, e; J.ll, 12; K.3.a•, K.5.b; Criterion lei). Pg. 182.

Performance Measure: (1) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) members of the general public, (4)

The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.(5) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and KI available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV. (6) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (7) 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. (8) All nuioüg instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. (9) A label indicating such calibration must be on each instrument. (10) 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. (11) 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.

(Agree)

Critical Task: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for EWs including provisions to authorize radiation exposure in excess of administrative limits or PAGs (NUREG-0654 C.6.f; K.4 Criterion 2a1). Pg. 185.

Performance Measure: (1) OROs authorized to send emergency workers into the plume exposure pathway EPZ must demonstrate a capability to comply with emergency worker exposure limits based on their emergency plans/procedures. (2) OROs must also demonstrate the capability to make decisions concerning authorization of exposure levels in excess of pre-authorized levels and the number of emergency workers receiving radiation doses above pre-authorized levels. (3) This would include providing KI and dosimetry in a timely manner to

emergency workers dispatched onsite to support plant incident assessment and mitigating actions, in accordance with respective plans/procedures.

(Agree)

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 ofK1 to EWs (NUREG-0654 K.3.a, b, 1<.4; Criterion 3a1). Pg. 189.

Performance Measures: (1) 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 preestablished 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. (2) 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. (3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.(4) 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. (5) 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. (6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent record dosimet1Y. (7) 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. (8) 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. (9) Emergency workers must demonstrate basic knowledge of procedures for using KI. If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge.

(Agree)

Critical Task: Field teams (two or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure (NUREG C. 1; H. 12; 1.7, 8, 11; J. 10.a; Criterion 4a2). Pg. 195.

Performance Measure: (1) Responsible OROs must demonstrate the capability to brief FMTs on predicted plume location and direction, plume travel speed, and exposure control procedures before deployment. (2) During an HAB incident, the Field Team management must keep the incident command informed of field monitoring teams' activities and location. (3) Teams must be directed to take measurements at such locations and times as necessary to provide sufficient information to characterize the plume and its impacts. If the responsibility for obtaining peak measurements in the plume has been accepted by licensee field monitoring teams, with concurrence from OROs, there is no requirement for these measurements to be repeated by ORO monitoring teams. (4) If the licensee FMTs do not obtain peak measurements in the plume, it is the ORO's decision as to whether peak measurements are necessary to sufficiently characterize the plume. (5) The sharing and coordination of plume measurement information among all FMTs (licensee, Federal, and ORO) is essential.

As per BRC SOPs only the edge of the plume is identified

Critical Task: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low-background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media (NUREG C. 1; 1.8, 9; H. 12; J.l o.a•, Criterion 40). Pg. 195.

Performance Measure: (1) Two or more FMTs must demonstrate the capability to make and report measurements of ambient radiation to the field team coordinator, dose assessment team, or other appropriate authority. (2) FMTs must also demonstrate the capability to obtain an air sample for measurement of airborne radioiodine and particulates, and to provide the appropriate authority with field data pertaining to measurement. (3) If samples have radioactivity significantly above background, the authority must consider the need for expedited laboratory analyses of these samples. (4) Coordination concerning transfer of samples, including a chain-of-custody form(s), to a radiological laboratory(ies) must be demonstrated. (5) O ROS must share data in a timely manner with all other appropriate OROs. All methodology, including contamination control, instrumentation, preparation of samples, and a chain-of-custody form(s) for transfer to a laboratory'(ies), will be in accordance with the ORO's plans/procedures.

(Agree)

Critical Task: The field teams (two or more) demonstrate the capability to make appropriate measurements and collect samples (e.g., food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making (NUREG-0654C.1; 1.8; J. 11; Criterion 4b1). Pg. 196.

Performance Measures: (1) The ORO's FMTs must demonstrate the capability to take measurements and samples at such times and locations as directed to enable an adequate assessment of the ingestion exposure pathway and to support reentry, relocation, and return decisions. (2) When resources are available, use of aerial surveys and in-situ gamma measurement is appropriate.(3) All methodology, including contamination control, instrumentation, preparation of samples, and chain-of- custody form(s) for transfer to a laboratory(ies), will be in accordance with the ORO's plans/procedures. The FMTs and/or other sampling personnel must secure ingestion exposure pathway samples from agricultural products and water. Samples in support of relocation and return must be secured from soil, vegetation, and other surfaces in areas that received radioactive ground deposition.

Not evaluated for this exercise

Critical Task: The laboratory is capable of performing required radiological analyses to suppon PADs (NUREG-0654 C. 1; 3; J.11; Criterion 4c1). Pg. 197.

Performance Measure: (1) The laboratory staff must demonstrate the capability to follow appropriate procedures for receiving samples, including logging information, preventing contamination of the laboratory(ies), preventing buildup of background radiation due to stored samples, preventing cross contamination of samples, preserving samples that may spoil (e.g., milk), and keeping track of sample identity. (2) In addition, the laboratory staff must demonstrate the capability to prepare samples for conducting measurements. (3) The laboratory(ies) must be appropriately equipped to provide, upon request, timely analyses of media of sufficient quality and sensitivity to support assessments and decisions anticipated in the ORO's plans/procedures. (4) The laboratory instrument calibrations must be traceable to standards provided by the National Institute of Standards and Technology. Laboratory methods used to analyze typical radionuclides released in a reactor incident must be as described in the plans/procedures. New or revised methods may be used to analyze atypical radionuclide releases (e.g., transuranics or as a result of a terrorist incident) or if warranted by incident circumstances. Analysis may require resources beyond those of the ORO. (5) The laboratory staff must be qualified in radioanalytical techniques and contamination control procedures.
Not evaluated for this exercise

Approved: Tim Dunn, 12/12/18

Miami-Dade County
Extent of Play Agreement
Turkey Point

PLUME PHASE FULL PARTICIPATION RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE

All activities will be demonstrated fully in accordance with respective plans and procedures as they would be in an actual emergency (FEMA must receive these plans, guides and procedures NLT 60 days before the exercise). This Extent of Play agreement is written by exception. If it is not listed as an exception it will be demonstrated as described in the plans, standard operating guides (SOGs) and/or procedures (SOPs). Any issue or discrepancy arising during exercise play may be re-demonstrated, if allowed by the RAC Chair, or as listed herein. This allowance may be granted if it is not disruptive to exercise play and is mutually agreed to by the ORO controller and FEMA evaluator.

Contents

Core Capability: Operational Coordination

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

Capability Target: Emergency Operations Management

Critical Task: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner (NUREG-0654 A. I .a, e; A.3, 4; C. 1 , 4, 6; D.4; E.I, 2; G.3.a-i H.3, 4; Criterion lai). Pg. 180.

Performance Measure	Extent of Play

(1) OROs must demonstrate the capability to receive notification of an incident from the licensee;	No exception.
(2) verify the notification,	Verification will occur only if the notification occurs via a mechanism other than the HRD or EMnet.
(3) contact, alert, and mobilize key emergency personnel in a timely manner,	Exercise participants will be staged at the EOC.
(4) Responders must demonstrate the ability to receive and/or initiate notification to the licensees or other respective emergency management organizations of an incident in a timely manner when they receive information.	Exercise participants will be staged at the EOC. Process may be demonstrated via interview.
(5) Demonstrate the ability to maintain and staff 24-hour operations.	Demonstrated during SAV.
(6) OROs must demonstrate the activation of facilities for immediate use by mobilized personnel u on their arrival.	Miami-Dade maintains a "Hot" EOC. Exercise participants will be staged at the EOC.
(7) The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP.	Miami-Dade staff will report to the EOF, as warranted to support incident command.
(8) The ability to identify and request additional resources or identify compensatory measures must be demonstrated.	No exception.

Critical Task: Facilities are sufficient to support the emergency response (NUREG-0654 H.3; G.3.a•, J. 10.h, J. 12; K.5.b•, Criterion Ibi). Pg. 180.

Performance Measure	Extent of Play
OROs must demonstrate: (l) The availability of facilities to support accomplishment of emergency operations. This includes all alternate and backup facilities. Some of the areas evaluated within the facilities are adequate space, furnishings, lighting, restrooms, sleeping/ hygiene, ventilation, backup power, automation and audio visual. This is accomplished no less than once every eight years, or, during the first biennial exercise after any new or substantial changes in structure, equipment, or mission that affect key capabilities.	The primary EOC has been demonstrated within the past 8 years. The alternate EOC (5600 SW 87 Ave) will be demonstrated via SAV on Dec 5, 2018.
(2) Radio stations, laboratories, initial warning points and hospitals are not evaluated under l.b. 1.	Not applicable.

Critical Task: At least 2 communications systems are available, at least 1 operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F. 1, 2; Criterion Idl). Pg. 181.

Performance Measure	Extent of Play
OROs must demonstrate that a primary system and at least one backup system are fully functional.	A primary and backup communication system will be demonstrated in the EOC as liaisons interact with each other and their organization during routine exercise la
(2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone s stem.	No exception.
(3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations.	No exception.
(4) OROs must ensure that a coordinated communication link for fixed and mobile medical sup ort facilities exists.	No exception.

Critical Tasks - Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. 10.a, b, e; J.11 , 12; K.3.a•, K.5.b•, Criterion lei). Pg. 182.

Performance Measure	Extent of Play
(l) 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.	No exception.
(2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational	Not demonstrated.
(3 locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and signs) must be available.	Demonstrated via interview at the EOC.
(4) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public,	Demonstrated during SAV.
(5) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.	Demonstrated during SAV.
(6) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimet1Y and KI available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV.	Demonstrated during SAV.
(7) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams.	Demonstrated during SAV.

(8) 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.	Demonstrated during SAV.
(9) All monitoring instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations.	Not demonstrated.
(10) A label indicating such calibration must be on each instrument.	Demonstrated during SAV.
(11) 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.	Demonstrated during SAV.
(12) 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.	Not demonstrated.

Capability Target: Precautionary and/or Protective Action Decision Making

Critical Task: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible (NUREG-0654 A. I .d; A.2.a, b; A.3•, C.4, 6; Criterion TCI). Pg. 181.

Performance Measure	Extent of Play
(1) Leadership personnel must demonstrate the ability to carry out the essential management functions of the response effort (e.g., keeping staff informed through periodic briefings and/or other means, coordinating with other OROs, and ensuring completion of requirements and requests.)	No exception.
(2) Leadership must demonstrate the ability to prioritize resource tasking and replace/supplement resources (e.g., through MOUs or other agreements) when faced with competing demands for finite resources. Any resources identified through LOA/MOUs must be on the ORO's mobilization list so they may be contacted during an incident if needed.	No exception.

Critical Task: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for EWs including provisions to authorize radiation exposure in excess of administrative limits or PAGs (NUREG-0654 C.6•, F; K.3.a; 1<.4 Criterion 2al). Pg. 184-185

Performance Measure	Extent of Play
(1) OROs authorized to send emergency workers into the plume exposure pathway EPZ must demonstrate a capability to comply with emergency worker exposure limits based on their emergency plans/procedures.	Demonstrated through interview at the EOC.
(2) OROs must also demonstrate the capability to make decisions concerning authorization of exposure levels in excess of pre-authorized levelsand the number of emergency workers receiving radiation doses above re-authorized levels.	Demonstrated through interview at the EOC.
(3) This would include providing KI and dosimetry in a timely manner to emergency workers dispatched onsite to support plant incident assessment and mitigating actions, in accordance with respective plans/procedures.	Demonstrated through interview at the EOC.

Critical Task: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make PADs for the general public (including the recommendation for the use of 1<1, if ORO policy) (NUREG-0654 A.3; C.4, 6; 1).4; J.9•, J. 10.e.f, m Criterion 2b2). Pg. 185.

Performance Measure	Extent of Play
(l) OROs must have the capability to make both initial and subsequent precautionary and/or protective action decisions in a timely manner appropriate to the incident, based on information from the licensee, assessment of plant status and potential or actual releases, other available information related to the incident, input from appropriate ORO authorities (e.g., incident command), and PARs :from the utility and ORC) staff.	No exception.
(2) In addition, a subsequent or alternate precautionary and/or protective action decision may be appropriate if various conditions (e.g., an HAB incident, weather, release timing and magnitude) pose undue risk to an evacuation or if evacuation may disrupt the efforts to resp, ond to a hostile action.	No exception.
(3) OROs must demonstrate the ability to obtain supplemental resources (e.g., mutual aid) necessary to implement a precautionary and/or protective action decision if local law enforcement, fire service, HAZMAT, and emergency medical resources are used to augment response to the NPP site or other key infrastructure.	No exception.
(4) If the ORO has determined that KI will be used as a protective measure for the general public under offsite plans/procedures, then it must demonstrate the capability to make decisions on the distribution and administration of KI to supplement sheltering and evacuation. This decision must be based on the ORO's plans/procedures or projected thyroid dose compared with the established PAG for KI administration. The KI decision-making process must involve close coordination with appropriate assessment and decision-making staff.	Demonstrated through interview at the EOC.

(5) If more than one ORO is involved in decision making, all appropriate OROs must communicate and coordinate precautionary and/or protective action decisions with each other.	No exception.
(6) In addition, decisions must be coordinated / communicated with incident command. OROs must demonstrate the capability to communicate the results of decisions to all the affected locations.	No exception.

Critical Task: Protective action decisions are made, as appropriate, for groups of persons with disabilities and access/functional needs (NUREG-0654 D.4; J.9; J. 10.d, e; Criterion 2cl). Pg. 186

Performance Measure	**Extent of Play**
Usually it is appropriate to implement evacuation in areas where doses are projected to exceed the lower end of the range of PAGs, except for incidents where there is a high- risk environmental condition or where high-risk groups (e.g., the immobile or infirm) are involved. In these cases, factors that must be considered include weather conditions, shelter availability, availability of transportation assets, risk of evacuation versus risk from the avoided dose, and precautionary school evacuations. In addition, decisions must be coordinated / communicated with the incident command. In situations where an institutionalized population cannot be evacuated, the ORO must consider use of KI.	No exception.
(2) OROs must demonstrate the capability to alert and notify all public school systems/districts of emergency conditions that are expected to or may necessitate protective actions for students. Demonstration requires that the OROs actually contact public school systems/ districts during the exercise.	Demonstrated via interview. Upon request, the MDCPS Liaison will conduct a communications check with the district office.

(3) OROs must demonstrate how the decision-making process takes those with disabilities and access/functional needs (e.g., nursing homes, correctional facilities, licensed day cares, mobility-impaired individuals, and transportation-dependent individuals) into account.	HIPAA protected information may not be viewed.

Capability Target: Protective Action Implementation

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWS 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 to EWs (NUREG0654 J. 10.e, K.3.a, b, 1<.4•, Criterion 3a1).Pg. 189-190.

Performance Measure	Extent of Play
(1) 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 preestablished 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.	Demonstrated through interview at the EOC
(2) 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.	No exception.

(3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.	No exception.
(4) 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.	No exception,
(5) 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.	No exception.
(6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent-record dosimetry.	Not applicable.
(7) 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.	No exception.
(8) 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) the did so.	No exception.
(9) Emergency workers must demonstrate basic knowledge of procedures for using KI. If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge.	No exception.

Critical Task: KI and appropriate instructions are available if a decision to recommend use of KI is made. Appropriate record-keeping of the administration of KI for institutionalized individuals and the general public is maintained (NUREG-0654 J. 10.e, f; Criterion 3bl). Pg. 190.

Performance Measure	Extent of Play
(1) OROs must demonstrate the capability to make available to institutionalized individuals and, where provided for in their plans/procedures, to members of the general public.	No exception.
(2) OR()s must demonstrate the capability to accomplish distribution of 1<1 consistent with decisions made.	Will be demonstrated through interview at the EOC.
(3) OROs must have the capability to develop and maintain lists of institutionalized individuals who have ingested KI, including documentation of the date(s) and time(s) they were instructed to ingest 1<1. OROs must demonstrate the capability to formulate and disseminate instructions on using KI for those advised to take it.	Will be demonstrated through interview at the EOC.
(4) If a recommendation is made for the general public to take KI, appropriate information must be provided to the public by the means of notification specified in the ORO's plans/ procedures.	No exception.

Critical Task: Protective action decisions are implemented for persons with disabilities and access/functional needs other than schools within areas subject to protective actions (NUREG0654 J.10.c, d, e, g; Criterion 3c1). Pg. 190

Performance Measure	Extent of Play
(l) Applicable OROs must demonstrate the capability to alert and notify (i.e., provide PARs and emergency information and instructions) to persons with disabilities and access/ functional needs, including hospitals/medical facilities, licensed day cares, nursing homes, correctional facilities, and mobility-impaired and transportation dependent individuals.	No exception.
(2) OROs must demonstrate the capability to provide for persons with disabilities and access/functional needs.	No exception.

Critical Task: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel (NUREG-0654 A.3; C. 1 , 4; J. 10.g, j; Criterion 3d1) Pg. 191-192.

Performance Measure	Extent of Play
(1) OROs must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and PAI)s (e.g., evacuating, sheltering, and relocation) in a timely manner.	Will be demonstrated through interview at the EOC.
(2) OR()s must demonstrate the capability to provide instructions to traffic and access control staff on actions to take when modifications in protective action strategies necessitate changes in evacuation patterns or in the area(s) where access is controlled.	Will be demonstrated through interview at the EOC.
(2) Traffic and access control staff must demonstrate accurate knowledge of their roles and responsibilities, including verifying emergency worker identification and access authorization to the affected areas.	Not demonstrated.
(3) In instances where OROs lack authority necessary to control access by certain types of traffic (e.g., rail, water, and air traffic), they must demonstrate the capability to contact the State or Federal agencies that have the needed authority.	No exception.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. 10.k; Criterion 3d2). Pg. 192

Performance Measure	Extent of Play
(l) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations.	Will be demonstrated through interview at the EOC.
(2) The impediment must remain in place during the evacuation long enough that rerouting of traffic is required.	Will be demonstrated through interview at the EOC.
(3) Must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.	Will be demonstrated through interview at the EOC.

Core Capability: Critical Transportation

Definition: Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.

Capability Target: Protective Action Implementation
Critical Task: OROs/School officials implement protective actions for schools (NUREG-0654 J. 10.c, d, e, g; Criterion 30). Pg. 191.

Performance Measure	Extent of Play
(l) School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions for students,	Will be demonstrated through interview during SAV. Date to be negotiated.
(2) Each school system/district within the 10-mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/ district must participate in the demonstration.	Will be demonstrated through interview during SAV. Date to be negotiated.
(3) Which protective action is implemented (evacuation to reception centers, relocation to host schools, cancel the school day, early dismissal, shelter in place), all activities to coordinate and complete the process should be evaluated.	Will be demonstrated through interview during SAV. Date to be negotiated.
(4) School personnel including decision-making officials (e.g., schools' superintendent/principals and transportation director/bus dispatchers) and at least one bus driver (and the bus driver's escort, if applicable) must be available to demonstrate knowledge of their role(s) in the evacuation of school children.	Will be demonstrated through interview during SAV. Date to be negotiated.
(5) Communications capabilities between school officials and the buses, if required by the plans/procedures, must be verified.	Will be demonstrated through interview during SAV. Date to be negotiated.

(6) Officials of the school system(s) must demonstrate the capability to develop and provide timely information to OROs/parents for use in messages to parents, the general public, and the media on the status of protective actions for schools.	Will be demonstrated through interview during SAV. Date to be negotiated.

Core Capability: Public Information and Warning

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

Capability Target: Emergency Notification and Public Information

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. I O.a, b, e; J.1 1, 12; K.3.a; K.5.b; Criterion lei). Pg. 182.

Performance Measure	Extent of Play
(1) 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.	No exception.
(2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role.	Not demonstrated.
(3) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams.	Not demonstrated.
(4) 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.	Not demonstrated.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. 10.k;. Criterion 3d2). Pg. 192.

Performance Measure	Extent of Play
(l) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations.	No exception.
(2) , The impediment must remain in place during the evacuation long enough that rerouting of traffic is required.	No exception.
(3) Must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.	No exception.

Critical Task: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP Guidance (Timely: The responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay) (NUREG0654 E.5, 6, 7; Criterion Sal). Pg. 198-199.

Performance Measure	Extent of Play
(1) Responsible OR()s must demonstrate the capability to sequentially provide an alert signal followed by an initial instructional message to populated areas throughout the 10mile plume exposure pathway EPZ.	Siren activation will be simulated. The individual tasked with siren activation will escort the evaluator to the Siren Control Terminal and describe the process for activating the sirens.
(2) Following the decision to activate the alert and notification system, OROs must complete system activation for primary alert/notification and disseminate the information/instructions in a timely manner. For exercise purposes, timely is defined as "with a sense of urgency and without undue delay."	No exception.
(3) Procedures to broadcast the message must be fully demonstrated as they would in an actual emergency up to the point of transmission. Broadcast of the message(s) or test message(s) is not required. The procedures must be demonstrated up to the point of actual activation. The alert signal activation should be simulated, not performed.	No exception.

(4) Evaluations of EAS broadcast stations may also be accomplished through SAVs.	Not demonstrated.
(5) The capability of the primary notification system to broadcast an instructional message on a 24-hour basis must be verified during an interview with appropriate personnel from the primary notification system, including verification of provisions for backup power or an alternate station.	Not demonstrated.
(6) The initial message must include at a minimum the following elements: (a) Identification of the ORO responsible and the official with authority for providing the alert signal and instructional message; (b) Identification of the commercial NPP and a statement that an emergency exists there; (c) Reference to RFP-specific emergency information (e.g., brochures, calendars, and/or information in telephone books) for use by the general public during an emergency; and (d) A closing statement asking that the affected and potentially affected population stay tuned for additional inf01•mation, or that the population tune to another station for additional information.	No exception.
(7) If route alerting is demonstrated as a primary method of alert and notification, it must be done in accordance with the ORO's plans/procedures. OROs must demonstrate the capability to accomplish the primary route alerting in a timely manner (not subject to specific time requirements). At least one route needs to be demonstrated and evaluated. The selected route(s) must vary from exercise to exercise. However, the most difficult route(s) must be demonstrated no less than once every eight /ears.	Not demonstrated.
(8) All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actual broadcast).	Not demonstrated.

(9) Actual testing of the mobile public address system will be conducted at an agreed-upon location.	Not demonstrated.

Critical Task: Waterway warning / Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system (NUREG-0654 E.6; Appendix 3.B.2.c; Criterion 5a3). Pg. 199

Performance Measure	**Extent of Play**
(1) Backup alert and notification procedures that would be implemented in multiple stages must be structured such that the population closest to the plant (e.g., within 2 miles) is alerted and notified first. The populations farther away and downwind of any potential radiological release would be covered sequentially (e.g., 2 to 5 miles, followed by downwind 5 to 10 miles, and finally the remaining population as directed by authorities).	Demonstrated during SAV Dec 5, 2018.
(2) Although circumstances may not allow this for all situations, FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plume exposure pathway EPZ within a reasonable time of failure of the primary alert and notification system, with a recommended goal of 45 minutes.	Not demonstrated.
(3) The backup alert message must, at a minimum, include: (a) a statement that an emergency exists at the plant and (b) instructions regarding where to obtain additional information. When backup route alerting is demonstrated, only one route needs to be selected and demonstrated. All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actually broadcast), as negotiated in the extent of play.	Demonstrated during SAV Dec 5, 2018.

(4) Actual testing of the mobile public address system will be conducted at an agreed-upon location. Waterway Warning Backup Route Alert	Backup route alerting will be demonstrated during SAV Dec 5, 2018. Waterway warning will not be demonstrated.

Critical Task: Ensure OROs provide accurate emergency information and instructions to the public and the news media in a timely manner (The responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay) (NUREG-0654 E.5, 7; G.3.a; G.4.a, c; Criterion 5bl). Pg. 200-201.

Performance Measure	**Extent of Play**
(l) The responsible ORO personnel / representatives must demonstrate actions to provide emergency information and instructions to the public and media in a timely manner following the initial alert and notification (not su12ject to specific time requirements). For exercise purposes, timely is defined as "with a sense of urgency and without undue delay."	No exception.
(2) Message elements: The ORO must ensure that emergency information and instructions are consistent with PADs made by appropriate officials.	No exception.
(3) The emergency information must contain all necessary and applicable instructions (e.g., evacuation instructions, evacuation routes, reception center locations, what to take when evacuating, shelter-in-place instructions, information concerning protective actions for schools and persons with disabilities and access/functional needs, and public inquiry hotline telephone number) to assist the public in carrying out the PADs provided.	No exception.
(4) The ORO must also be prepared to disclose and explain the ECL of the incident. At a minimum, this information must be included in media briefings and/or media releases.	No exception.

(5) OROs must demonstrate the capability to use language that is clear and understandable to the public within both the plume and ingestion exposure at the EPZs.	No exception.
(6) This includes demonstration of the capability to use familiar landmarks and boundaries to describe protective action areas.	No exception.
(7) The emergency information must be all inclusive by including the four items specified under exercise Demonstration Criterion 5.a.1 and previously identified protective action areas that are still valid, as well as new areas.	No exception.
(8) Information about any rerouting of evacuation routes due to impediments should also be included.	No exception.
(9) The OROs must demonstrate the capability to ensure that emergency information that is no longer valid is rescinded and not repeated by broadcast media.	No exception.
(10) OROs must demonstrate the capability to ensure that current emergency information is repeated at pre-established intervals in accordance with the plans/procedures.	No exception.
(1 l) OROs must demonstrate the capability to develop emergency information in a non-English language when required by the plans/procedures.	No exception.
(12) If ingestion exposure pathway measures are required, OROs must demonstrate that a system exists for rapid dissemination of ingestion exposure pathway information to redetermined individuals and businesses.	Not demonstrated.
(13) Media information: OROs must demonstrate the capability to provide timely, accurate, concise, and coordinated information to the news media for subsequent dissemination to the public.	No exception.
(14) This would include demonstration of the capability to conduct timely and pertinent media briefings and distribute media releases as the incident warrants.	No exception.

(15) The OROs must demonstrate the capability to respond appropriately to injuries from the news media.	No exception.
(16) All information presented in media briefings and releases must be consistent with PADs and other emergency information provided to the public.	No exception.
(17) Copies of pertinent emergency information (e.g., EAS messages and media releases) and media information kits must be available for dissemination to the media.	No exception.
(18) Public Inquiry OROs must demonstrate that an effective system is in place for dealing with calls received via the public inquiry hotline.	No exception.
(19) Hotline staff must demonstrate the capability to provide or obtain accurate information for callers or refer them to an appropriate information source.	No exception.
(20) Information from the hotline staff. including information that corrects false or inaccurate information when trends are noted, must be included, as appropriate, in emergency information provided to the public, media briefings, and/or media releases.	No exception.
HAB considerations: (21) The dissemination of information dealing with specific aspects of NPP security capabilities, actual or perceived adversarial (terrorist) force or threat, and tactical law enforcement response must be coordinated/ communicated with appropriate security authorities (e.g., law enforcement and NPP security agencies) in accordance with ORO Plans/procedures,	Not demonstrated.

Core Capability: Environmental Response/Health and Safety

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

Capability Target: Support Operations and Facilities

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. 1 0.a, b, e; J.11, 12; K.3.a•, K.5.b•, Criterion lei). Pg. 182

Performance Measure	Extent of Play
(I) A particular facility's equipment and supplies must be sufficient and consistent with that facility's assigned role in the ORO's emergency operations plan.	The demonstration will occur out of sequence on March 13, 2019 at Tamiami Park located at 11201 SW 24 Street, Miami, FL 33165.
(2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role.	No exceptions.
(3) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public	Not demonstrated.
(4) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of 1<1.	No exception.
(5) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and 1<1 available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV.	Not demonstrated.
(6) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams.	Not demonstrated.

(7) 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.	No exception.
(8) All monitoring instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations.	No exception.
(9) A label indicating such calibration must be on each instrument.	No exception.
(10) 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.	No exception.
(1 1) 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 Tor Emergency Response, FEMA-REP-21 (March 1995) or in accordance with the manufacturer's recommendations.	No exception.

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 EWs (NUREG0654 K.3.a, b, 1<.4•, Criterion 3a1). Pg. 189.

Performance Measure	Extent of Play
(1) 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 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.	KI for emergency workers will not be demonstrated.
(2) 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.	No exception.
(3) During a _plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.	Not demonstrated.
(4) 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.	Not demonstrated.
(5) 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.	No exception.

(6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent record dosimetry	Not demonstrated.
(7) 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.	Not demonstrated.
(8) 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) the did so.	Not demonstrated.
(9) Emergency workers must demonstrate basic knowledge of procedures for using KL If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge e.	No exception.

Critical Task: The reception center facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees (NUREG-0654 A.3•, C.4•, J. 10.h•, J. 12; Criterion 6a1). Pg. 202-203.

Performance Measure	Extent of Play
(l) Radiological monitoring, decontamination, and registration facilities for evacuees must be set up and demonstrated as they would be in an actual emergency.	Facilities will be set up as necessary to demonstrate the capabilities for monitoring, decontamination, and registration. Traffic & crowd control will be set up to support the demonstration but will not be subject to evaluation. Each of the capabilities listed above will be demonstrated on the afternoon of 3/13/19 at Tamiami Park. Structural components of the facility (e.g., fencing, parking blocks) will not be altered or removed but can be demonstrated via discussion. Tents may be set up in advance of the demonstration.
(2) OROs conducting this demonstration must have (a) one-third of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(s) as necessary to monitor (b) 20 percent of the population within a 12-hour period. (c) This would include adequate space for evacuees' vehicles.	Thirteen portal monitors (1/3 of the total needed to monitor 20% of the EPZ population within 12 hours) will be used to demonstrate the throughput rate. Twenty-six people are needed to operate the portals (2 per portal, 1 to operate the meter & 1 to direct the evacuee). An additional 12 people are needed to manage evacuee movement. Six handheld meters are needed to support portal monitor operations and to manage potential contamination control concerns. One lined garbage can will be in place in the screening area. Eight dry decontamination spaces will be set up for the demonstration. Disposable supplies (i.e., wet wipes, redress kits) on hand during the demonstration will remain packaged. Six firefighters, with hand friskers, will demonstrate the guided dry decontamination procedure and subsequent confirmation frisking of six contaminated victim actors.
(2) Availability of resources can be demonstrated with valid documentation (e.g., MC)U/LOA, etc.) reflecting how necessary equipment would be procured for the location.	Procurement (e.g., emergency purchasing procedures) of additional quantities of equipment and supplies will be demonstrated via a staff assistance visit.

(3) Plans/procedures must indicate provisions for service animals.	Provisions for service animals will be demonstrated via discussion.
(4) Before using monitoring instrument(s), the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation.	No exception.
(5) Staff responsible for the radiological monitoring of evacuees must demonstrate the capability to attain and sustain, within about 12 hours, a monitoring productivity rate per hour needed to monitor the 20 percent EPZ population planning base.	Calculation of the monitoring productivity rate per hour will be determined by measuring the throughput of victim actors at the portal monitors that will be in operation. Controllers will indicate the existence of contamination to the staff operating the devices. The controllers will identify victim actors as contaminated, at random.
(6) The monitoring productivity rate per hour is the number of evacuees that can be monitored, per hour, by the total complement of monitors using an appropriate procedure.	
(7) For demonstration of monitoring, decontamination, and registration capabilities, a minimum of six evacuees must be monitored per stationusing equipment and procedures specified in the plans/ procedures.	An attempt will be made to secure more, but a minimum of 10 actor victims will be present for the demonstration, Contingent on the victim actors present, it may become necessary for the present actor victims to pass through each portable monitor multiple times to meet the indicated "six evacuees per station. "
(8) The monitoring sequences for the first six simulated evacuees per monitoring team will be timed by the evaluators to determine whether the 12-hour requirement can be met.	Contingent on the actual number of actor victims present, each portal monitor may be timed individually, with the time count paused as they move from one portal monitor to another, and the times compiled to obtain a comprehensive monitoring rate.
(9) OROs must demonstrate the capability to register evacuees upon completion of the monitoring and decontamination activities.	No exception.
(10) The activities for recording radiological monitoring and, if necessary, decontamination must include establishing a registration record consisting of the (a) evacuee's name, (b) address, (c) results of monitoring, and (d) time of decontamination (if any), or as otherwise designated in the plan and/or procedures. Audio recorders, camcorders, or written records are all acceptable means for registration.	No exception.

(11) Monitoring activities shall not be simulated.	Controllers will indicate the existence of contamination to the staff operating the devices. The controllers will identify victim actors as contaminated, at random.
(12) Monitoring personnel must explain use of trigger/action levels for determining the need for decontamination.	No exception.
(13) They must also explain the procedures for referring any evacuees who cannot be adequately decontaminated for assessment and follow-up in accordance with the ORO's plans/procedures. All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency. Decontamination of evacuees may be simulated and conducted by interview.	Two victim actors will be resurveyed after the dry decontamination demonstration. Controllers will indicate the existence of contamination to the staff operating the frisker(s). Decontamination will be demonstrated via discussion.
(14) Provisions for separate showering and same-sex decontamination must be demonstrated or explained.	Decontamination will be demonstrated via discussion.
(15) The staff must demonstrate provisions for limiting the spread of contamination. Provisions could include floor coverings, signs, and appropriate means (e.g., partitions, roped-off areas) to separate uncontaminated from potentially contaminated areas.	No exception.
(16) Provisions must also exist to (a) separate contaminated and uncontaminated evacuees, (b) provide changes of clothing for those with contaminated clothing, and (c) store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities.	Modesty kits will be available in limited quantities but will not be used. The management of contaminated personal belongings will be demonstrated via discussion.
(17) In addition, for any evacuee found to be contaminated, procedures must be discussed concerning handling of potential contamination of vehicles and personal belongings. Waste water from decontamination operations does not need to be collected.	Management of potentially contaminated vehicles and belongings will be demonstrated via discussion.

(18) Individuals who have completed monitoring and decontamination if needed, must have the means (e.g., hand stamp, sticker, bracelet, form, etc.) indicating that (a) they, and their service animals and vehicles, where applicable, have been monitored, cleared, and found to have no contamination or (b) contamination below the trigger/action level or (c) have been placed in a secure area until they can be monitored and decontaminated, if necessary. In accordance with plans/procedures, individuals found to be clean after monitoring do not need to have their vehicle monitored. These individuals do not require confirmation that their vehicle is free from contamination prior to entering the congregate care areas.	No exception.
(19) However, those individuals who are found to be contaminated and are then decontaminated will have their vehicles (a) held in a secure area or (b) monitored and decontaminated (if applicable) and do require confirmation that their vehicle is being (c) held in a secure area or (d) free from contamination prior to entering the congregate care areas.	Management of potentially contaminated vehicles will be demonstrated via discussion. Vehicles will not be monitored for the demonstration. If passengers are contaminated, vehicles will be assumed to be contaminated also.

Core Capability: On-Scene Security, Protection, and Law Enforcement

Definition: Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel engaged in lifesaving and life-sustaining operations.

Capability Target: Protective Action Implementation

Critical Task: At least 2 communications systems are available, at least 1 operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F. 1 , 2; Criterion Idl). Pg. 180.

Performance Measure	Extent of Play
OROs must demonstrate that a primary system and at least one backup system are fully functional.	Demonstrated during out of sequence on Dec 5, 2018.
(2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system.	No exception.
(3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations.	No exception.

Critical Task: Equipment (to include communications), maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H.7, 10; 1.7, 8, 9; J.10.a, b, e; Ji l l , 12; K.3.a•, K.5.b•, Criterion lei). Pg. 182.

Performance Measure	Extent of Play
(1) A particular facility's equipment and supplies must be sufficient and consistent with that facility's assigned role in the ORO's emergency operations plan.	Demonstrated during out of sequence on Dec 5, 2018.
(2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role.	No exception.
(3)At locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and si s) must be available.	Procedures may be demonstrated via discussion.
(4) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public	KI will be simulated with hard candy.
(5) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.	No exception.

(6) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and 1<1 available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV.	Not demonstrated
(7) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams.	Not demonstrated.
(8) 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.	No exception
(9) All monitoring instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations.	Not demonstrated.
(10) A label indicating such calibration must be on each instrument.	Not demonstrated.
(1 1) 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.	Not demonstrated.
(12) 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.	Not demonstrated.

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 EWs (NUREG0654 K.3.a, b, K.4•, Criterion 3al). Pg. 189.

Performance Measure	Extent of Play
(l) 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 preestablished 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.	Demonstrated during out of sequence on Dec 5, 2018. KI will be simulated with hard candy.
(2) 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.	No exception.
(3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.	No exception.
(4) 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.	No exception.

(5) 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.	No exception.
(6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent-record dosimet1'Y.	Not applicable
(7) 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.	No exception.
(8) 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 K I, including documentation of the date(s and times they did so.	No exception.
(9) Emergency workers must demonstrate basic knowledge of procedures for using KI. If exercise play does not require emergency workers to consume K I, evaluators must interview at least two workers to determine their knowledge.	No exception.

Critical Task: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel (NUREG-0654 A.3; C. 1, 4; J. 10.g, j; Criterion 3d1). Pg. 191-192.

Performance Measure	Extent of Play
(1) OROs must demonstrate the capability to establish, and staff appropriate traffic and access control points consistent with current conditions and PADs (e.g., evacuating, shelter in , and relocation) in a timely manner.	Demonstrated through discussion during out of sequence on Dec 5, 2018.
(2) OROs must demonstrate the capability to provide instructions to traffic and access control staff on actions to take when modifications in protective action strategies necessitate changes in evacuation patterns or in the area(s) where access is controlled.	No exception.
(2) Traffic and access control staff must demonstrate accurate knowledge of their roles and responsibilities, including verifying emergency worker identification and access authorization to the affected areas.	No exception.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. 10.k; Criterion 3d2). Pg. 192

Performance Measure	Extent of Play
(1) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations.	Demonstrated through discussion during out of sequence on Dec 5, 2018.
(2) The impediment must remain in place during the evacuation long enough that rerouting of traffic is required	Not demonstrated.
(3) Must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.	Not demonstrated.

Approved: Frank Rollason, Miami-Dade Emergency Management
September 27, 2018

Monroe County
Extent of Play Agreement
Turkey Point Monroe

PLUME PHASE FULL PARTICIPATION RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE

All activities will be demonstrated fully in accordance with respective plans and procedures as they would be in an actual emergency (FEMA must receive these plans, guides and procedures NLT 60 days before the exercise). This Extent of Play agreement is written by exception. If it is not listed as an exception it will be demonstrated as described in the plans, standard operating guides (SOGs) and/or procedures (SOPs). Any issue or discrepancy arising during exercise play may be re-demonstrated if allowed by the RAC Chair or as listed herein. This allowance may be granted if it is not disruptive to exercise play and is mutually agreed to by the ORO controller and FEMA evaluator.

Core Capability: Operational Coordination

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

Capability Target: Emergency Operations Management Performance Measure:

Critical Task: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner (NUREG-0654 A. 1.a, e; A.3, 4; C. 1 , 4, 6; D.4; E. 1 , 2; G.3.a-i H.3, 4; Criterion lai). Pg. 180.

Performance Measure: (l) OROs must demonstrate the capability to receive notification of an incident from the licensee; (2) verify the notification, (3) contact, alert, and mobilize key emergency personnel in a timely manner, (4) Responders must demonstrate the ability to receive and/or initiate notification to the licensees or other respective emergency management organizations of an incident in a timely manner when they receive information. (5) Demonstrate the ability to maintain and staff 24-hour operations. (6) OROs must demonstrate the activation of facilities for immediate use by mobilized personnel upon their arrival.(7) The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP. (8) The ability to identify and request additional resources or identify compensatory measures must be demonstrated.

Concur, Monroe County Emergency Management personnel will preposition at the FP&L Emergency Operations Facility located at 9250 West Flagler Street, Miami, Florida until notification of Alert. Upon notification of the Alert those personnel will deploy within the FP&L Emergency Operations Facility to their respective positions. The Monroe County Sheriff's Office Dispatch located at 2796 Overseas Highway, Marathon, FL 33050, will receive the Florida Nuclear Plant Emergency Notification form from the Turkey Point Nuclear Plant. Appropriate notifications will then be made to exercise players and will simulate remaining notifications. Monroe County Emergency Management personnel will also pre-position at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Critical Task: Facilities are sufficient to support the emergency response (NUREG-0654 H.3; G.3.a•, J. IO.h, J.12•, K.5.b•, Criterion 1b l). Pg. 180.

Performance Measure: OROs must demonstrate: (l) The availability of facilities to support accomplishment of emergency operations. This includes all alternate and backup facilities. Some of the areas evaluated within the facilities are adequate space, furnishings, lighting, restrooms, sleeping/ hygiene, ventilation, backup power, automation and audio visual. This is accomplished no less than once every eight years, or, during the first biennial exercise after any new or substantial changes in structure, equipment, or mission that affect key capabilities. (2) Radio stations, laboratories, initial warning points and hospitals are not evaluated under l.b.l.

Concur, Monroe County will demonstrate during the exercise at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit. Examination of the Alternate REP EOC can also take place during the SAV walk thru December 3, 2018 0800.

Critical Task: At least 2 communications systems are available, at least I operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.l, 2; Criterion Idl). Pg. 181.

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations. (4) OROs must ensure that a coordinated communication link for fixed and mobile medical support facilities exists.

Concur, Monroe County will deploy activated SAT Phone at the FP&L Emergency Operations Facility located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located

at 151 Marine Avenue, Tavernier, Florida. Staff can demonstrate the SAT Phones during the exercise.

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H.7, 10; 1.7, 8, 9; J. 10.a, b, e; J. I l , 12; K.3.a; K.5.b; Criterion le i). Pg. 182.

Performance Measure: (l) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) At locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and signs) must be available. (4) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public, (5) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.(6) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and KI available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV. (7) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (8) 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. (9) All nuüæ instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. (10) A label indicating such calibration must be on each instrument. (11) 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. (12) 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.

Concur, SAV facility evaluation and walk thru December 3, 2018 0800.
Capability Target: Precautionary and/or Protective Action Decision Making Performance Measure:

Critical Task: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible (NUREG0654 A. l .d•, A.2.a, b; A.3•, C.4, 6; Criterion Ici).. Pg. 181.

Performance Measure: (l) Leadership personnel must demonstrate the ability to carry out the essential management functions of the response effort (e.g., keeping staff informed through periodic briefings and/or other means, coordinating with other OROs, and ensuring completion of requirements and requests.) (2) Leadership must demonstrate the ability to prioritize resource tasking and replace/supplement resources (e.g., through MOUs or other agreements) when faced with competing demands for finite resources. Any resources identified through LOA/MOUs must be on the ORO's mobilization list so they may be contacted during an incident if needed.

Concur, Monroe County Emergency Management personnel will preposition at the FP&L Emergency Operations Facility located at 9250 West Flagler Street, Miami, Florida until notification of Alert. Upon notification of the Alert those personnel will deploy within the FP&L Emergency Operations Facility to their respective positions. The Monroe County Sheriff's Office Dispatch located at 2796 Overseas Highway, Marathon, FL 33050, will receive the Florida Nuclear Plant Emergency Notification form from the Turkey Point Nuclear Plant. Appropriate notifications will then be made to exercise players and will simulate remaining notifications. Monroe County Emergency Management personnel will also pre-position at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit. Alternate EOC facilities at the Marathon Government Center 2798 Overseas Highway, Marathon Florida during our SAV walk thru.

Critical Task: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for EWs including provisions to authorize radiation exposure in excess of administrative limits or PAGs (NUREG-0654 C.6•, F; K.3.a•, K.4 Criterion 2al). Pg. 184-185.

Performance Measure: (l) OROs authorized to send emergency workers into the plume exposure pathway EPZ must demonstrate a capability to comply with emergency worker exposure limits based on their emergency plans/procedures. (2) OROs must also demonstrate the capability to make decisions concerning authorization of exposure levels in excess of pre-authorized levels and the number of emergency workers receiving radiation doses above pre-authorized levels. (3) This would include providing KI and dosimetry in a timely manner to emergency workers dispatched onsite to support plant incident assessment and mitigating actions, in accordance with respective plans/procedures.

Concur, Monroe County Emergency Management will discuss at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. And/ Or at the Marine Reception Center exercise at the Murray Nelson Cultural Center 102050 Overseas Hwy Key Largo FL 33037 March 5, 2019 1000.

Critical Task: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make PADs for the general public (including the recommendation for the use of KI, if ORO policy) (NUREG-0654 A.3; C.4, 6; D.4; J.9; J.lO.e.f, m Criterion 2b2). Pg. 185.

Performance Measure: (l) OROs must have the capability to make both initial and subsequent precautionary and/or protective action decisions. in a timely manner appropriate to the incident, based on information from the licensee, assessment of plant status and potential or actual releases, other available information related to the incident, input from appropriate ORO authorities (e.g., incident command), and PARs from the utility and ORO staff. (2) In addition, a subsequent or alternate precautionary and/or protective action decision may be appropriate if various conditions (e.g., an HAB incident, weather, release timing and magnitude) pose undue risk to an evacuation or if evacuation may disrupt the efforts to respond to a hostile action.(3) OROs must demonstrate the ability to obtain supplemental resources (e.g., mutual aid) necessary to implement a precautionary and/or protective action decision if local law enforcement, fire service, HAZMAT, and emergency medical resources are used to augment response to the NPP site or other key infrastructure. (4) If the ORO has determined that KI will be used as a protective measure for the general public under offsite plans/procedures, then it must demonstrate the capability to make decisions on the distribution and administration of KI to supplement sheltering and evacuation. This decision must be based on the ORO's plans/procedures or projected thyroid dose compared with the established PAG for KI administration. The KI decision-making process must involve close coordination with appropriate assessment and decision-making staff. (5) If more than one ORO is involved in decision making, all appropriate OROs must communicate and coordinate precautionary and/or protective action decisions with each other.(6) In addition, decisions must be coordinated/ communicated with incident command. OROs must demonstrate the capability to communicate the results of decisions to all the affected locations.

> Concur, Monroe County will be discussed during the exercise at the FP&L Emergency Operations Facility located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Critical Task: Protective action decisions are made, as appropriate, for groups of persons with disabilities and access/functional needs (NUREG-0654 D4; JD; J. 10.d, e; Criterion 2cl). Pg. 186.

Performance Measures: Usually it is appropriate to implement evacuation in areas where doses are projected to exceed the lower end of the range of PAGs, except for incidents where there is a high- risk environmental condition or where high-risk groups (e.g., the immobile or infinn) are involved.(l) In these cases, factors that must be considered include weather conditions, shelter availability, availability of transportation assets, risk of evacuation versus risk from the avoided dose, and precautionary school evacuations. In addition, decisions must be coordinated/communicated with the incident command. In situations where an institutionalized

population cannot be evacuated, the ORO must consider use of KI. (2) OROs must demonstrate the capability to alert and notify all public school systems/districts of emergency conditions that are expected to or may necessitate protective actions for students. Demonstration requires that the OROs actually contact public school systems/districts during the exercise. (3) OROs must demonstrate how the decision-making process takes those with disabilities and access/functional needs (e.g., nursing homes, correctional facilities, licensed day cares, mobility-impaired individuals, and transportation-dependent individuals) into account.

> Concur, Monroe County will discuss during the exercise at the FP&L Emergency Operations Facility and Emergency News Center located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Capability Target: Protective Action Implementation Performance Measure: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 EWs (NUREG-0654 J. 10.e, K.3.a, b, K.4•, Criterion 3al).Pg. 189 190.

Performance Measures: (l) 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 preestablished 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. (2) 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. (3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.(4) 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. (5) 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. (6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent record dosimetry. (7) 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. (8) 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. (9) Emergency workers must demonstrate basic knowledge of procedures for using KI. If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge.

> Concur, Monroe County will demonstrate during Marine Reception Center exercise at the Murray Nelson Cultural Center 102050 Overseas Hwy Key Largo FL 33037 March 5, 2019 1000.

Critical Task: KI and appropriate instructions are available if a decision to recommend use of KI is made. Appropriate record-keeping of the administration of KI for institutionalized individuals and the general public is maintained (NUREG-0654 J. 10.e, f; Criterion 3b 1). Pg. 190.

Performance Measures: (l) OROs must demonstrate the capability to make KI available to institutionalized individuals and, where provided for in their plans/procedures, to members of the general public. (2) OROs must demonstrate the capability to accomplish distribution of KI consistent with decisions made. (3) OROs must have the capability to develop and maintain lists of institutionalized individuals who have ingested KI, including documentation of the date(s) and time(s) they were instructed to ingest KI. OROs must demonstrate the capability to formulate and disseminate instructions on using KI for those advised to take it.(4) If a recommendation is made for the general public to take KI, appropriate information must be provided to the public by the means of notification specified in the ORO's plans/ procedures.

> Concur, Monroe County will discuss at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida, and or at the Marine Reception Center exercise at the Murray Nelson Cultural Center 102050 Overseas Hwy Key Largo FL 33037 March 5, 2019 1000.

Critical Task: Protective action decisions are implemented for persons with disabilities and access/functional needs other than schools within areas subject to protective actions (NUREG-0654 J. 10.c, d, e, g; Criterion hi). Pg. 190.

Performance Measures: (l) Applicable OROs must demonstrate the capability to alert and notify (i.e., provide PARs and emergency information and instructions) to persons with disabilities and access/ functional needs, including hospitals/medical facilities, licensed day cares, nursing homes, correctional facilities, and mobility-impaired and transportation-dependent individuals. (2) OROs must demonstrate the capability to provide for persons with disabilities and access/functional needs.

> Concur, Monroe County will discuss at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida

Critical Task: OROs/School officials implement protective actions for schools (NUREG0654 CJ. 10.c, d, e, g; Criterion 3c2). Pg. 191.

Performance Measures: (l) School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions for students. (2) Each school system/district within the 10-mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/ district must participate in the demonstration. (3) Which protective action is implemented (evacuation to reception centers, relocation to host schools, cancel the school day, early dismissal, shelter in place). (4) Officials of the school system(s) must demonstrate the capability to develop and provide timely information to OROs/parents for use in messages to parents, the general public, and the media on the status of protective actions for schools.

> Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue in Tavernier Florida and via discussion with school officials during the SAV December 3, 2018 at 0800.

Critical Task: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel (NUREG-0654 A.3; C. l, 4; J. 10.g, j; Criterion 3dl) Pg. 191-192.

Performance Measures: (l) OROs must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and PADs (e.g., evacuating, sheltering, and relocation) in a timely manner. (2) OROs must demonstrate the capability to provide instructions to traffic and access control staff on actions to take when modifications in protective action strategies necessitate changes in evacuation patterns or in the area(s) where access is controlled. (2) Traffic and access control staff must demonstrate accurate knowledge of their roles and responsibilities, including verifying emergency worker identification and access authorization to the affected areas. (3) In instances where OROs lack authority necessary to control access by certain types of traffic (e.g., rail, water, and air traffic), they must demonstrate the capability to contact the State or Federal agencies that have the needed authority.

> Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. IO.k; Criterion 3d2). Pg. 192.

Performance Measures: (I) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations. (2) , The impediment must remain in place during the evacuation long enough that re-routing of traffic is required and (3) must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.

Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida

Core Capability: Critical Transportation

Definition: Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.

Capability Target: Protective Action Implementation

Performance Measure:

Critical Task: OROs/School officials implement protective actions for schools (NUREG0654 J. 10.c, d, e, g; Criterion 3c2). Pg. 191.

Performance Measure : (l) School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions for students. (2) Each school system/district within the 10-mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/ district must participate in the demonstration. (3) Which protective action is implemented (evacuation to reception centers, relocation to host schools, cancel the school day, early dismissal, shelter in place), all activities to coordinate and complete the process should be evaluated. (4) School personnel including decision-making officials (e.g., schools' superintendent/principals and transportation director/bus dispatchers) and at least one bus driver (and the bus driver's escort, if applicable) must be available to demonstrate knowledge of their role(s) in the evacuation of school children. (5) Communications capabilities between school officials and the buses, if required by the plans/procedures, must be verified. (6) Officials of the school system(s) must demonstrate the capability to develop and provide timely information to OROs/parents for use in messages to parents, the general public, and the media on the status of protective actions for schools.

Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida and during live interviews with the principal/ or administrators of the Academy at Ocean Reef 395 S Harbor Dr, Key Largo, FL 33037 and Ocean Reef Club Kids 35 Ocean Reef Drive Key Largo, FL 33037 during the SAV December 3, 2018 0800.

Core Capability: Public Information and Warning

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

Capability Target: Emergency Notification and Public Information Performance Measure:

Critical Task; Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. 10.a, b, e; J. I l, 12; K.3.a•, K.5.b•, Criterion lei). Pg. 182.

Performance Measure: (l) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (4) 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.

> Concur, will be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida and during SAV December 3, 2018 at 0800.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. 10.k•, Criterion 3d2). Pg. 192.

Performance Measures: (l) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations. (2) , The impediment must remain in place during the evacuation long enough that re-routing of traffic is required and (3) must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.

> Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Critical Task: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP Guidance (Timely: The responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay) (NUREG-0654 E.5, 6, 7; Criterion 5al). Pg. 198-199.

Performance Measure: (l) Responsible OROs must demonstrate the capability to sequentially provide an alert signal followed by an initial instructional message to populated areas throughout the 10-mile plume exposure pathway EPZ. Following the decision to activate the alert and notification system, (2) OROs must complete system activation for primary alert/notification and

disseminate the information/instructions in a timely manner. For exercise purposes, timely is defined as "with a sense of urgency and without undue delay." (3) Procedures to broadcast the message must be fully demonstrated as they would in an actual emergency up to the point of transmission. Broadcast of the messages(s) is not required. The procedures illustrated must be demonstrated up to the point of actual activation. The alert Signal activation should be simulated, not performed. Evaluations of EAS broadcast stations may also be accomplished through SAVs. (4) The capability of the primary notification system to broadcast an instructional message on a 24-hour basis must be verified during an interview with appropriate personnel from the primary notification system, including verification of provisions for backup power or an alternate station. (5) The initial message must include at a minimum the following elements:

- (a) Identification of the ORO responsible and the official with authority for providing the alert signal and instructional message;
- (b) Identification of the commercial NPP and a statement that an emergency exists there;
- (c) Reference to REP-specific emergency information (e.g., brochures, calendars, and/or information in telephone books) for use by the general public during an emergency; and
- (d) A closing statement asking that the affected and potentially affected population stay tuned for additional information, or that the population tune to another station for additional information.

(6) If route alerting is demonstrated as a primary method of alert and notification, it must be done in accordance with the ORO's plans/procedures. OROs must demonstrate the capability to accomplish the primary route alerting in a timely manner (not subject to specific time requirements). At least one route needs to be demonstrated and evaluated. The selected route(s) must vary from exercise to exercise. However, the most difficult route(s) must be demonstrated no less than once every eight years. (7) All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actually broadcast. (8) Actual testing of the mobile public address system will be conducted at an agreed-upon location.

> Concur will be demonstrated/discussed during the exercise at the FP&L Emergency Operations Facility and/or Emergency News Center located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Critical Task: Waterway warning / Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system (NUREG-0654 E.6; Appendix 3.B.2.c; Criterion 5a3). Pg. 199.

Performance Measure: (l) Backup alert and notification procedures that could be implemented in multiple stages must be structured such that the population closest to the plant (e.g., within 2 miles) is alerted and notified first. The populations farther away and downwind of any potential radiological release would be covered sequentially (e.g., 2 to 5 miles, followed by downwind 5 to 10 miles, and finally the remaining population as directed by authorities). (2) Although circumstances may not allow this for all situations, FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plume exposure pathway EPZ within a reasonable time of failure of the primary alert and notification system, with a recommended goal of 45 minutes. (3) The backup alert message must, at a minimum, include: (a)a statement that an emergency exists at the plant and (b) instructions regarding where to obtain additional information. When backup route alerting is demonstrated, only one route needs to be selected and demonstrated. All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actually broadcast), as negotiated in the extent of play. (4) Actual testing of the mobile public address system will be conducted at an agreed-upon location.

Waterway Warning:
Backup Route Alert:

Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Critical Task: Ensure OROs provide accurate emergency information and instructions to the public and the news media in a timely manner (The responsible ORO personnel/representatives demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay) (NUREG0654 E.5, 7; G.3.a•, G.4.a, c; Criterion 5b l). Pg. 200-201.

Performance Measure: (l) The responsible ORO personnel/representatives must demonstrate actions to provide emergency information and instructions to the public and media in a timely manner following the initial alert and notification (not subject to specific time requirements). For exercise purposes, timely is defined as "with a sense of urgency and without undue delay." Message elements: (2) The ORO must ensure that emergency information and instructions are consistent with PADs made by appropriate officials. (3) The emergency information must contain all necessary and applicable instructions (e.g., evacuation instructions, evacuation routes, reception center locations, what to take when evacuating, shelter-in-place instructions, information concerning protective actions for schools and persons with disabilities and access/functional needs, and public inquiry hotline telephone number) to assist the public in carrying out the PADs provided (4) The ORO must also be prepared to disclose and explain the ECL of the incident. At a minimum, this information must be included in media briefings and/or media releases. (5) OROs must demonstrate the capability to use language that is clear and understandable to the public within both the plume and ingestion exposure pathway EPZs. (6) This includes demonstration of the capability to use familiar landmarks and boundaries to describe protective action areas. (7) The emergency information must be all-inclusive by

including the four items specified under exercise Demonstration Criterion 5.a. I and previously identified protective action areas that are still valid, as well as new areas. (8) Information about any rerouting of evacuation routes due to impediments should also be included. (9) The OROs must demonstrate the capability to ensure that emergency information that is no longer valid is rescinded and not repeated by broadcast media. (10) OROs must demonstrate the capability to ensure that current emergency information is repeated at pre-established intervals in accordance with the plans/procedures. (1 l) OROs must demonstrate the capability to develop emergency information in a non-English language when required by the plans/procedures. (12) If ingestion exposure pathway measures are required, OROs must demonstrate that a system exists for rapid dissemination of ingestion exposure pathway information to predetermined individuals and businesses. Media information: (13) OROs must demonstrate the capability to provide timely, accurate, concise, and coordinated information to the news media for subsequent dissemination to the public. (14) This would include demonstration of the capability to conduct timely and pertinent media briefings and distribute media releases as the incident warrants. (15) The OROs must demonstrate the capability to respond appropriately to inquiries from the news media. (16) All information presented in media briefings and releases must be consistent with PADs and other emergency information provided to the public. (17) Copies of pertinent emergency information (e.g., EAS messages and media releases) and media information kits must be available for dissemination to the media. Public Inquiry (18) OROs must demonstrate that an effective system is in place for dealing with calls received via the public inquiry hotline. (19) Hotline staff must demonstrate the capability to provide or obtain accurate information for callers or refer them to an appropriate information source. (20) Information from the hotline staff, including information that corrects false or inaccurate information when trends are noted, must be included, as appropriate, in emergency information provided to the public, media briefings, and/or media releases. HAB considerations: (21) The dissemination of information dealing with specific aspects of NPP security capabilities, actual or perceived adversarial (terrorist) force or threat, and tactical law enforcement response must be coordinated/ communicated with appropriate security authorities (e.g., law enforcement and NPP security agencies) in accordance with ORO Pans/procedures.

Concur will be demonstrated/discussed during the exercise at the FP&L Emergency Operations Facility and Emergency News Center located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit.

Core Capability: Environmental Response/Health and Safety

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

Capability Target: Support Operations and Facilities Performance Measure:

Critical Task: Equipment, maps, displays, monitoring instruments, dosimetry, KI, and other

supplies are sufficient to support emergency operations (NUREG-0654 H. 7, 10; 1.7, 8, 9; J. 10.a, b, e; J.l l, 12; K.3.a; K.5.b•, Criterion lei). Pg. 182

Performance Measure: (l) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public, (4) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.(5) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and KI available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV. (6) OROs must demonstrate the capability to maintain inventories of appropriate direct read and permanent record dosimeters in sufficient quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (7) 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. (8) All nmmg instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. (9) A label indicating such calibration must be on each instrument. (10) 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. (l l) 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.

> Concur to be demonstrated during SAV December 3, 2018 at following locations: DOH Pharmacy 50 Highpoint Road, and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. If necessary, decisions can be made while in transit. Alternate EOC facilities at the Marathon Government Center 2798 Overseas Highway, Marathon Florida during our SAV walk thru.

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 Kl to EWs (NUREG-0654 K.3.a, b, K.4•, Criterion 3al). Pg. 189.

Performance Measures: (l) OROs must demonstrate the capability to provide emergency workers (including supplemental resources) with the appropriate direct-reading and permanent record dosimetry, dosimeter chargers, K I, 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 preestablished 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 OROs plans/procedures. (2) 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. (3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.(4) 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. (5) 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. (6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent record dosimetry. (7) 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. (8) 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. (9) Emergency workers must demonstrate basic knowledge of procedures for using KI. If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge.

> Concur, to be demonstrated OOS March 5, 2019 at the Marine Reception Center exercise at the Murray Nelson Cultural and Government Center at 102500 Overseas Highway Key Largo 33037.

Critical Task: The reception center facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees (NUREG-0654 A.3•, C.4•, J. 10.h; J. 12; Criterion 6a1). Pg. 202-203.

Performance Measure: (l) Radiological monitoring, decontamination, and registration facilities for evacuees must be set up and demonstrated as they would be in an actual emergency. (2) OROs conducting this demonstration must have (a) one-third of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(ies) as necessary to monitor (b) 20 percent of the population within a 12-hour period. (c) This would include adequate space for evacuees' vehicles. (2) Availability of resources can be demonstrated with valid documentation

(e.g., MOU/LOA, etc.) reflecting how necessary equipment would be procured for the location. (3) Plans/procedures must indicate provisions for service animals.(4) Before using monitoring instilment(s), the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation. (5) Staff responsible for the radiological monitoring of evacuees must demonstrate the capability to attain and sustain, within about 12 hours, a monitoring productivity rate per hour needed to monitor the 20 percent EPZ population planning base. (6) The monitoring productivity rate per hour is the number of evacuees that can be monitored, per hour, by the total complement of monitors using an appropriate procedure. (7) For demonstration of monitoring, decontamination, and registration capabilities, a minimum of six evacuees must be monitored per station using equipment and procedures specified in the plans/ procedures. (8) The monitoring sequences for the first six simulated evacuees per monitoring team will be timed by the evaluators to determine whether the 12-hour requirement can be met. (9) OROs must demonstrate the capability to register evacuees upon completion of the monitoring and decontamination activities. (10) The activities for recording radiological monitoring and, if necessary, decontamination must include establishing a registration record consisting of the (a) evacuee's name, (b) address, (c) results of monitoring, and (d) time of decontamination (if any), or as otherwise designated in the plan and/or procedures. Audio recorders camcorders or written records are all acceptable means for registration. (11) Monitoring activities shall not be simulated. (12) Monitoring personnel must explain use of trigger/action levels for determining the need for decontamination. (13) They must also explain the procedures for referring any evacuees who cannot be adequately decontaminated for assessment and follow-up in accordance with the ORO's plans/procedures. All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency. Decontamination of evacuees may be simulated and conducted by interview. (14) Provisions for separate showering and same-sex decontamination must be demonstrated or explained. (15) The staff must demonstrate provisions for limiting the spread of contamination. Provisions could include floor coverings. signs. and appropriate means (e.g. partitions. roped-off areas) to separate uncontaminated from potentially contaminated areas. (16) Provisions must also exist to (a) separate contaminated and uncontaminated evacuees, (b) provide changes of clothing for those with contaminated clothing, and (c) store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. (17) In addition, for any evacuee found to be contaminated, procedures must be discussed concerning handling of potential contamination of vehicles and personal belongings. Waste water from decontamination operations does not need to be collected. (18) Individuals who have completed monitoring and decontamination if needed, must have the means (e.g., hand stamp, sticker, bracelet, form, etc.) indicating that (a) they, and their service animals and vehicles, where applicable, have been monitored, cleared, and found to have no contamination or (b) contamination below the trigger/action level or (c) have been placed in a secure area until they can be monitored and decontaminated, if necessary. In accordance with plans/procedures. individuals found to be clean after monitoring do not need to have their vehicle monitored. These individuals do not require confirmation that their vehicle is free from contamination prior to entering the congregate care areas. (19) However, those individuals who are found to be contaminated and are then decontaminated will have their vehicles (a) held in a secure area or (b) monitored and decontaminated (if applicable) and do require confirmation that their vehicle is being (c) held in a secure area or (d) free from contamination prior to entering the congregate care areas.

Core Capability: On-Scene Security, Protection, and Law Enforcement

Definition: Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel engaged in lifesaving and life-sustaining operations.

Capability Target: Protective Action Implementation Performance Measure:

Critical Task: At least 2 communications systems are available, at least I operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations (NUREG-0654 F.l, 2; Criterion Idl). Pg. 180.

Performance Measure: OROs must demonstrate that a primary system and at least one backup system are fully functional. (2) All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. (3) Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations.

> Concur, Monroe County will deploy activated SAT Phone at the FP&L Emergency Operations Facility located at 9250 West Flagler Street, Miami, Florida and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida. Staff can demonstrate the SAT Phones during the exercise.

Critical Task: Equipment (to include communications), maps, displays, monitoring instruments, dosimetry, KI, and other supplies are sufficient to support emergency operations (NUREG-0654 H.7, 10; 1.7, 8, 9; J. IO.a, b, e; J. I1, 12; K.3.a; K.5.b; Criterion le i). Pg. 182.

Performance Measure: (l) 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. (2) For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. (3) At locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and signs) must be available. (4) Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams (e.g., civil news media) (b) institutionalized individuals and (c) members of the general public, (5) The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI.(6) ORO physical inspection at the storage location(s) or through documentation of quantities of dosimetry and KI available and storage locations(s) will be confirmed by current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV. (7) OROs must demonstrate the capability to maintain inventories of appropriate direct-read and permanent record dosimeters in sufficient

quantities for use by: (a) emergency workers, ancillary groups as identified in plans or specialized response teams. (8) 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. (9) All monitoring instruments must be inspected, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. (10) A label indicating such calibration must be on each instrument. (I I) 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. (12) 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 Portal Monitor Used for Emergency Response, FEMA-REP-21 (March 1995) or in accordance with the manufacturer's recommendations.

> Concur to be demonstrated during SAV December 3, 2018 at following locations: DOH Pharmacy 50 Highpoint Road, and at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernieri Florida. If necessary, decisions can be made while in transit. Alternate EOC facilities at the Marathon
> Government Center 2798 Overseas Highway, Marathon Florida during our SAV walk thru.

Critical Task: OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to EWs in accordance with the plans/procedures. EWs 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 Kl to EWs (NUREG-0654 K.3.a, b, K.4•, Criterion 3al). Pg. 189.

Performance Measures: (l) 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. (2) 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. (3) During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached.(4) 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. (5) 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. (6) 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 and can share a direct read dosimeter. Each team member must still have and maintain his or her own permanent record dosimetry. (7) 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. (8) 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. (9) Emergency workers must demonstrate basic knowledge of procedures for using KIO If exercise play does not require emergency workers to consume KI, evaluators must interview at least two workers to determine their knowledge.

> Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida and during the Marine Reception Center Exercise OOS March 5, 2018.

Critical Task: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel (NUREG-0654 A.3; C. 1 , 4; J. 10.g, j; Criterion 3dl). Pg. 191-192

Performance Measures: (l) OROs must demonstrate the capability to establish, and staff appropriate traffic and access control points consistent with current conditions and PADs (e.g., evacuating, sheltering, and relocation) in a timely manner. (2) OROs must demonstrate the capability to provide instructions to traffic and access control staff on actions to take when modifications in protective action strategies necessitate changes in evacuation patterns or in the area(s) where access is controlled. (2) Traffic and access control staff must demonstrate accurate knowledge of their roles and responsibilities, including verifying emergency worker identification and access authorization to the affected areas.

> Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida.

Critical Task: Impediments to evacuation are identified and resolved (NUREG-0654 J. 10.k; Criterion 3d2). Pg. 192

Performance Measures: (l) OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations. (2), The impediment must remain in place during the evacuation long enough that re-routing of traffic is required and (3) must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.

Concur, to be discussed at the Tavernier Radiological Emergency Preparedness Emergency Operations Center located at 151 Marine Avenue, Tavernier, Florida.

Approved : Monroe Emergency Management Director. October 5, 2019