



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

December 2, 2019

Mr. Victor Gonzalez
Emergency Preparedness Manager
Limerick Generating Station
3146 Sanatoga Road
Pottstown, PA 19464

**SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – FEDERAL
EMERGENCY MANAGEMENT AGENCY LEVEL 1 FINDING FROM 2019
EVALUATED EMERGENCY PREPAREDNESS EXERCISE**

Dear Mr. Gonzalez:

On November 19, 2019, the U.S. Nuclear Regulatory Commission (NRC) and Federal Emergency Management Agency (FEMA) completed an evaluation of an emergency preparedness exercise at Limerick Generating Station, Units 1 and 2. During this exercise, FEMA identified a Level 1 issue related to the performance of activities in the Skipack Township Emergency Management Agency. This letter is publicly available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19336A156.

Enclosed is correspondence from FEMA Region III to the Pennsylvania Emergency Management Agency, dated November 22, 2019, which provides detailed information about each of the issues involved in the Level 1 finding. As discussed in our November 26, 2019, telephone call, the NRC is performing our responsibilities described in the Memorandum of Understanding (MOU) Between FEMA and NRC (Appendix A to 44 CFR 353). This MOU is also available in ADAMS at Accession No. ML15344A371. Specifically, this letter and its enclosure serve as formal notification of the Level I finding and our responsibility to monitor Exelon's efforts to work with State and local authorities to correct the identified inadequacy. Approximately 60 days after official notification of the Level I finding, the NRC, in consultation with FEMA, will assess the progress being made towards resolution. This is to ensure that

reasonable assurance remains, and the offsite organizations retain their ability to take appropriate protective measures to ensure the health and safety of the public.

If you have any questions, please do not hesitate to contact me at (610) 337-5200.

Sincerely,

/RA/

Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 05000352 and 05000353
License Nos. NPF-39 and NPF-85

Enclosure:
As stated

cc w/ encl: Distribution via ListServ

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – FEDERAL
EMERGENCY MANAGEMENT AGENCY LEVEL 1 FINDING FROM 2019
EVALUATED EMERGENCY PREPAREDNESS EXERCISE DATED
DECEMBER 2, 2019

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OFFICIAL RECORD COPY



FEMA

November 22, 2019

Mr. David R. Padfield
Director
Pennsylvania Emergency Management Agency
1310 Elmerton Avenue
Harrisburg, PA 17110

Dear Mr. Padfield:

The purpose of this letter is to officially inform you of the Federal Emergency Management Agency's (FEMA) identification of a Level 1 Finding that occurred during the Limerick Generating Station (LGS) Radiological Emergency Preparedness (REP) Exercise conducted on November 19, 2019. A Level 1 Finding is being assessed against the Skippack Township Emergency Management Agency due to sub-par performance under the following demonstration criterion:

3.a.1 Implementation of Emergency Worker Exposure Control

The Oil and Hazardous Material representative in the EOC did not perform all required functions for exposure control. There was no area dosimetry kit assembled and placed in the EOC to track radiation dose. The EOC staff was not provided the required Category B dosimetry kits and no dose tracking forms were completed. The radiological briefing was conducted only after urging through the controller and county EOC.

1.c.1 Direction and Control

The Emergency Management Coordinator failed to provide adequate direction and control in order to accomplish all required tasks within the Skippack Township EOC.

3.c.1 Implementation of Precautionary and/or Protective Actions for Persons with Disabilities and Access/Functional Needs

The Public Health and EMS, Transportation and Oil and Hazardous Material representatives in the EOC did not perform all required functions to provide notification or meet transportation needs for persons with disabilities and access/functional needs. Transportation needs were discussed for the persons identified and means of transporting those persons were mentioned. However, no calls or simulated calls were made to providers as required. The Public Health and EMS officer was to review the township's list for individuals with hearing impairments and to coordinate with the Oil and Hazardous Materials representative on actual notification of the emergency to the hearing impaired. During the exercise, the EMC advised the RO and Firefighting Officer that door-to-door notification would need accomplished for the hearing impaired. Staff acknowledged that it could be done, but the actual coordination between the Oil and Hazardous Material staff and Public Health and EMS Officer was not demonstrated. When the township received notification that sirens were to

Mr. David R. Padfield
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be sounded, no preparations or activation of personnel was made or simulated to notify the hearing impaired.

1.a.1 Mobilization

There was no 24-hour roster available to review.

3.d.1 Implementation of Traffic and Access Control

Staffing of the Traffic Control Points (TCPs) under the authority of Skippack Township was not clear. Activation of the TCPs was not conducted during the exercise. The Emergency Management Coordinator stated that the Township does not have a Police Department and that staffing of the TCPs in Skippack Township would be performed by Pennsylvania State Police (PSP). The Township Plan states that one of the four TCPs would be staffed by PSP and the remaining three by "Fire Police". The Skippack EOC made no effort to coordinate or communicate with any other agency to make sure the TCPs would be staffed.

In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with the pertinent organizations participating in the off-site exercise evaluation. The FEMA REP Program Manual, defines a Level 1 Finding as "...an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant."

Because of the potential impact of a Level 1 Finding on the protection of the public health and safety, it must be corrected within 120 days from the date of the exercise through appropriate remedial actions including remedial exercises, drills, or other actions. In accordance with the FEMA REP Program Manual, if the remedial exercise can be successfully completed within 75 days of the biennial exercise, FEMA includes the results and findings of the remedial exercise in the final AAR for the biennial exercise.

Please coordinate with this office the date and time of the remedial exercise within 10 days from receipt of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Thomas Scardino at (215) 931-5546.

Sincerely,

A handwritten signature in dark ink, appearing to read 'MaryAnn Tierney', with a stylized flourish at the end.

MaryAnn Tierney
Regional Administrator