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NRC/FEMA Operational Response Procedures for Response to a Commercial Nuclear Reactor Accident

U.S. Nuclear Regulatory
Commission



Federal Emergency Management
Agency



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NRC/FEMA Operational Response Procedures for Response to a Commercial Nuclear Reactor Accident

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ABSTRACT

Procedures have been developed by the U.S. Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA) which provide the response teams of both agencies with the steps to be taken in responding to an emergency at a commercial nuclear power plant. The emphasis of these procedures is mainly on the interface between NRC and FEMA at their respective Headquarters and Regional Offices and at the various sites at which such an emergency could occur. Detailed procedures are presented that cover for both agencies, notification schemes and manner of activation, organizations at Headquarters and the site, interface procedures, coordination of onsite and offsite operations, the role of the Senior FEMA Official, and the cooperative efforts of each agency's public information staff.

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FOREWORD

The NRC and FEMA have developed detailed operating procedures for responding to an emergency at a commercial nuclear power plant in order to clarify the principles and concepts of the FEMA/NRC Memorandum of Understanding and the Federal Radiological Emergency Response Plan. In such an emergency, the NRC will carry out the role of the Cognizant Federal Agency (CFA) since NRC regulates the radiological activity causing the emergency.

The FEMA/NRC Operational Response Procedures will be an evolving document. Both agencies understand that the procedures will continue to be changed as we gain operating experience, in order that the procedures remain workable and effective.

Until additional operational procedures are developed for other NRC licensed activities, the precepts and steps provided in this document will be followed, as closely as possible, in any significant incident involving NRC licensed activities.

ABBREVIATIONS

ARC	American Red Cross
AT&T	American Telephone & Telegraph Company
CFA	Cognizant Federal Agency
DOC	Department of Commerce
DOE	Department of Energy
DOI	Department of Interior
DOJ	Department of Justice
DOMS	Directorate of Military Support, DOD
DOT	Department of Transportation
DSFO	Deputy Senior FEMA Official
DSO	Director of Site Operations, NRC
EICC	Emergency Information and Coordination Center, FEMA
EO	Emergency Officer, NRC
EOF	Emergency Operations Facility
EPA	Environmental Protection Agency
ERT	Emergency Response Team, FEMA
EST	Emergency Support Team, FEMA
ET	Executive Team, NRC
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FRC	Federal Response Center
GSA	General Services Administration
HHS	Department of Health and Human Services
HQ	Headquarters
HUD	Department of Housing and Urban Development
ICC	Interstate Commerce Commission
JIC	Joint Information Center
LNO	Liaison Officer
NCS	National Communications System
NMCC	National Military Command Center, DOD
NOUE	Notification of Unusual Event, NRC
NRC	U.S. Nuclear Regulatory Commission
PAO	Public Affairs Officer, NRC, FEMA
PIO	Public Information Officer
RCT	Response Coordination Team, NRC
SBA	Small Business Administration
SFO	Senior FEMA Official
DOS	Department of State
TSC	Technical Support Center
USDA	Department of Agriculture
USPS	U.S. Postal Service

NRC/FEMA OPERATIONAL RESPONSE PROCEDURES
FOR RESPONSE TO A COMMERCIAL NUCLEAR REACTOR ACCIDENT

A. PRECEPTS

1. A workable agreement between the U.S. Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA) for a cooperative response to a radiological emergency involving NRC licensed activities should be preceded by an agreement on fundamental precepts.
 - a. Throughout any emergency involving NRC licensees, the licensee is ultimately responsible at the site of a facility, and State or local authorities are ultimately responsible elsewhere, for avoiding or minimizing risk to the public. The licensee is also required to make appropriate protective action recommendations to the offsite authorities. Consistent with their authorities, Federal officials are responsible for assisting licensees and State and local authorities in carrying out their responsibilities. NRC has the responsibility to monitor the licensee to assure that appropriate protective action is being taken with respect to offsite recommendations. NRC will take the lead in resolving issues related to the condition of the licensed activity, protective action recommendations, radiological monitoring efforts, and offsite radiological impact. FEMA will take the lead in resolving other issues related to the coordination of support and assistance to State and local authorities and other Federal agencies.
 - b. State authorities will be consulted about Federal assistance in support of State efforts and advised of other Federal activities.
2. The NRC will decide and explain Federal actions on issues related to the condition of the licensed activity and the real or potential offsite radiological impact, because of staff familiarity with license conditions and operator qualifications, facilities, and activities. Other Federal agencies, including FEMA, will decide and explain their actions on issues related to the activities of their agencies. The Senior FEMA Official's (SFO's) task is to ensure that the Federal actions and explanations are coordinated.

All agencies should take steps to ensure that Federal actions are coordinated and not confusing or in conflict when viewed as a whole by State and local authorities, news media, and the general public. Since those authorities, the media, and the public may contact whomever they please, the NRC and FEMA should:

- a. Recognize each other's area of responsibility and those of other agencies for deciding and explaining Federal actions.

- b. Refer inquiries from any source to the appropriate agency when the inquiry falls within another agency's area of responsibility. This should be done quickly, without attempting partial answers, to avoid confusion.
 - c. Keep each other and other agencies apprised of enough information to enable all agencies to maintain an overview of the evolving situation so as to be able to take timely actions.
3. The Federal Radiological Emergency Response Plan (FRERP) published as an interim plan in the Federal Register on September 12, 1984, contains the necessary provisions for a coordinated Federal response to all civil radiological emergencies and is the basis for these operational response procedures.

B. NOTIFICATION AND ACTIVATION

1. The NRC Operations Center will notify the FEMA Emergency Information and Coordination Center (EICC) of each of the following events and times as reported to the NRC Operations Center.
 - a. Any event reported by a licensee which is categorized as one of the emergency action classes as defined in NUREG-0654, Revision 1 (FEMA REP-1).*
 - b. When the Operations Center receives a report of an unplanned atmospheric or liquid release that exceeds two times the applicable concentrations listed in 10 CFR Part 20, Appendix B, Table II, in unrestricted areas, when averaged over a time period of one hour.
 - c. Any event for which the NRC goes into the Standby Mode.
 - d. Any event for which the NRC goes into an Activation Mode.
 - e. Any time the NRC/licensee modes are deescalated or deactivated.

The NRC Headquarters will provide to FEMA a general assessment of the event, placing the technical details in perspective. Such an assessment will be included in any further notifications that FEMA will make.

2. The NRC Regional Office will notify the appropriate FEMA Regional Office during normal duty hours and after hours, where appropriate procedures exist, of any change in the NRC response mode and its activation status. The NRC Regional Office will notify the appropriate FEMA Regional Office of other incidents that the NRC staff feels may be of interest to FEMA.

* U.S. Nuclear Regulatory Commission, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654, Revision 1, November 1980.

3. In addition to a general assessment, NRC Headquarters and the NRC Regional Office will provide FEMA Headquarters and the affected FEMA Regional Office, respectively, with the name and location of the facility, the licensed activities (if necessary), and a short description of the type of problem. When available, NRC will describe the initiating event and advise whether there have been radioactive releases or if such releases are expected.
4. FEMA personnel will not contact NRC licensees about any incident involving NRC licensed activities unless authorized by NRC to do so. FEMA Headquarters personnel will contact the NRC Operations Center and FEMA's regional personnel will contact the FEMA EICC or the appropriate NRC Regional Office to obtain further information about any event brought to the attention of FEMA personnel.
5. The NRC Operations Center will notify the FEMA EICC of all events reported by licensees as an emergency classification. Most Notification of Unusual Events (NOUEs) are relatively minor incidents; many have nothing to do with the reactor operation. The NRC may go into a Standby Mode if an NOUE is serious or has the potential for becoming significant. The FEMA EICC will notify the appropriate FEMA Regional Office(s) of an NOUE if NRC goes into a Standby Mode. The FEMA Regional Office will then contact the State and the NRC Regional Office to exchange information on the NOUE.
6. Table 1, described in more detail in NUREG-0728*, provides a relationship between the licensee classification of events and the NRC response mode.
7. Notifications to be made by NRC and FEMA Headquarters and Regional Office components are provided in Tables 2 and 3. Please note that the notifications are keyed to the NRC response mode which is based on an evaluation of licensee emergency classifications. Notifications to each of the other agencies listed in Tables 2 and 3 will contain, where possible, the pertinent information which each of these agencies has requested in the planning process. Information provided during the initial notification(s) should be sufficient for each agency to decide whether to activate its agency plan and/or deploy personnel. Whenever NRC is in Standby or an Activation mode and the licensee changes the emergency classification, the NRC and FEMA will each recontact all persons initially notified.

* U.S. Nuclear Regulatory Commission, "Report to Congress: NRC Incident Response Plan," NUREG-0728, Revision 1, September 1983.

Table 1

NRC Response Mode and Licensee Emergency Classification of Events

NRC Response Mode	Licensee Emergency Classification			
	Notification of Unusual Event	Alert	Site Area Emergency	General Emergency
Normal	X	(X)		
Standby	(X)	X	(X)	(X)
Activation*		(X)	X	X

() Indicates that this is not the usual mode for this condition.

*Initial or Expanded Activation

Initial Activation	Response teams report to the NRC Operations Center and other duty stations. The Incident Response Center (IRC) of the affected NRC Regional Office is fully activated and a designated Site Team is dispatched under the leadership of the Regional Administrator. Other Regional Offices are alerted. The focus of NRC response operations is at Headquarters.
Expanded Activation	The focus of NRC response operations is at the site, although Headquarters will retain any authority not delegated to the DSO. The Executive Team or a member of the Executive Team designated by the Director draws on all Regional and Headquarters personnel to provide support to the NRC Director of Site Operations. The DSO will be the primary spokesman for the NRC.

Table 2

NRC Notification Procedures

NRC contacts when the NRC response changes to:

<u>NRC Headquarters</u>	<u>NRC Region</u>
<u>Standby Mode</u>	<u>Standby Mode</u>
FEMA Headquarters	FEMA Region*
DOE Headquarters	DOE Region
EPA Headquarters	EPA Region
HHS Headquarters	HHS Region
FBI Headquarters (if safeguards)	FBI Region (if safeguards)
DOT Headquarters (if transportation)	DOT Region (if transportation)
	State Radiation Protection
 <u>Activation Mode</u>	 <u>Activation Mode</u>
FEMA Headquarters	FEMA Region*
DOE Headquarters	DOE Region
EPA Headquarters	EPA Region
HHS Headquarters	HHS Region
FBI Headquarters (if safeguards)	FBI Region (if safeguards)
DOT Headquarters (if transportation)	DOT Region (if transportation)
White House Situation Room (See C.11)	State Radiation Protection

* During duty hours and where appropriate procedures exist after duty hours.

Table 3

FEMA Notification Procedures

FEMA contacts when the NRC response changes to:

<u>FEMA Headquarters</u>	<u>FEMA Region</u>
<u>Standby Mode</u>	<u>Standby Mode</u>
FEMA Region White House (See C.11)	State emergency services office (others at Region's discretion)
(After consultation with NRC) NMCC, DOMS, DOT, USDA, HUD, ARC, DOC, GSA, SBA, USPS, HHS, EPA, ICC, DOS, AT&T, DOI, DOJ, DOE, NCS	
<u>Activation Mode</u>	<u>Activation Mode</u>
FEMA Region White House (See C.11)	State emergency services office
NMCC, DOMS, ICC, NCS, HUD, USDA, ARC DOC, DOS, GSA, SBA, USPS, HHS, EPA, DOI, AT&T, DOT, DOJ, DOE,	GSA, USDA, HHS, EPA, DOE, Field Army HQ, DOT, SBA, ARC (others at Region's discretion)

C. HEADQUARTERS EMERGENCY ORGANIZATION AND PROCEDURES

1. The NRC maintains an Operations Center which is staffed continuously. Direct and dedicated telephone lines connect the Operations Center to all nuclear power plants at which there is fuel on site, to certain licensed facilities at which significant quantities of fissile material are authorized, and NRC Regional Offices. The NRC Operations Center utilizes a graduated response which is based on the information reported by a licensee.
2. The EICC is the primary information-gathering and emergency operations facility of FEMA. Operating on a continuous basis, it provides information and coordination services including communications support for all of FEMA's program areas.
3. NRC Operations Center notifies the FEMA EICC of any event reported by a licensee which is categorized as one of the emergency classes defined in NUREG-0654, Revision 1 (FEMA REP-1), plus any other events described in Section B.1 of these FEMA/NRC procedures.
4. Upon notification that the NRC is in a Standby Mode, the FEMA Assistant Associate Director, Emergency Coordination and Support (OP-CS), with a Senior Project Officer, will proceed to the EICC, discuss the situation with NRC, monitor unfolding events, and provide information to the FEMA Director, top FEMA officials authorized to activate an emergency response, and affected Office heads. The Assistant Associate Director (OP-CS) may alert Emergency Support Team (EST) members and the headquarters staff component of the Emergency Response Team (ERT) that an activation may be necessary. He may also contact the affected Regional Director to request that the regional component of the ERT be alerted.
5. Upon declaration of an Activation Mode, the NRC Operations Center will be staffed with a comprehensive group of technical, management, and administrative personnel. Details of these Activation Modes are described in NUREG-0728 and NUREG-0845*. The initial management of the NRC response in the Activation Mode is conducted by the Director of the NRC response (Chairman or designee) assisted by an Executive Team consisting of:
 - ° Executive Director for Operations
 - ° Director, Office of Nuclear Reactor Regulation
 - ° Director, Office of Inspection and Enforcement
 - ° Director, Office of Nuclear Material Safety and Safeguards
6. When the NRC goes into an Activation Mode, the NRC Regional Administrator, or his designee, is deployed to the site. After familiarizing himself with the situation, the Regional Administrator will consult with the Director of the NRC response. The

* U.S. Nuclear Regulatory Commission, "Agency Procedures for the NRC Incident Response Plan," NUREG-0845, February 1983.

Director may then designate the Regional Administrator as Director of Site Operations (DSO) and provide him with specific authorities for carrying out the NRC response. In certain situations, the DSO may not be the Regional Administrator. Additional details of the designation and responsibilities of the DSO are in NUREG-0728 and NUREG-0845.

7. Upon notification that the NRC is in an Activation Mode and after consultation with NRC, the FEMA Assistant Associate Director (OP-CS) would consult with the affected FEMA Regional Director and may recommend activation of an Emergency Response Team (ERT) and/or the Emergency Support Team (EST) to the FEMA Director or his designee. The EST has a Director and may include representation from the following FEMA Offices:
 - Office of Emergency Coordination and Support
 - Emergency Information and Coordination Center
 - Office of Natural and Technological Hazards
 - Office of Disaster Assistance Programs
 - Office of Public Affairs
 - Office of Congressional Relations

This team will compile an overview of FEMA activities for the FEMA Director, resolve policy issues at the headquarters level, support the Senior FEMA Official (SFO), and coordinate the Headquarters Federal response. If required, additional members of the EST will be activated to enable 24-hour operations.

The FEMA Director may decide to deploy an SFO and/or members of the FEMA ERT to the scene of the incident. The activation directive will be transmitted through the EST. A Public Information Officer, a Congressional Relations Officer, a Senior Program Officer familiar with the planned response, and a Volunteer Agency Liaison Officer will accompany the SFO. NRC will be advised of ERT deployment. Before deployment of the regional ERT component, the FEMA Regional Office will inform the State about the planned response.

8. When the NRC goes into an Activation Mode, FEMA Headquarters and NRC Headquarters will exchange liaison officers (LNOs). Other Federal agencies will provide LNOs to FEMA and NRC depending on circumstances and requirements for exchanging information. In addition to the communication link between the FEMA LNO at the NRC Headquarters Operations Center and the EICC, if the EST Director needs to communicate with the NRC Operations Center he should contact the NRC Response Coordination Team (RCT) Director. Conversely, any matters that the RCT Director needs to discuss with FEMA would be directed to the EST Director.
9. The FEMA Emergency Response Team may be headed by a Deputy SFO (DSFO) until such time as the SFO arrives on the scene. The SFO may delegate his/her authorities to the DSFO until the SFO arrives and assumes responsibility. If the urgency of the situation requires action before the SFO is on the scene and operational and

an onscene DSFO has not been authorized to act for the SFO, the FEMA EST will establish and continue contact with the NRC and other Federal agencies to maintain awareness of the incident and the responses of the Federal agencies and coordinate FEMA assistance to the State. Until the SFO (or authorized DSFO) arrives on the scene, communications, requests and information will be directed to the FEMA EST. The Governor's representative in the State will be kept apprised of the situation through the FEMA Regional Office. From an early time in the response to a radiological event at a licensed nuclear facility, NRC Operations Center staff will contact the Governor's representative in the affected State(s), to inform the Governor(s) of the situation, and actions being recommended or taken by the NRC.

10. Once the SFO is in position and operational, responsibility for coordinating Federal assistance to the State will shift to the SFO at the scene. After that time, all formal Federal guidance and protective action recommendations to the State will be coordinated with the SFO except where imminent peril to the public health and safety exists and time does not permit a coordinated recommendation. The FEMA EST will provide FEMA Headquarters support for the SFO and the FEMA ERT and, in conjunction with NRC, coordinate Headquarters efforts to support on-scene activities.
11. Based on information provided by the SFO and other Federal agencies, the FEMA Director will provide periodically to the President, or his designee, an overall executive summary concerning the current status of the response. Via the FEMA EST, the FEMA Director will keep the White House Situation Room advised of continuing response activities. The NRC will make an initial notification to the White House Situation Room which, if possible, will include a statement on the condition of the licensed activity and the real or potential offsite radiological impact. In this initial notification, the NRC will advise the White House Situation Room that subsequent reports on the Federal response will be made to the FEMA EST for inclusion in the continuing reports to the White House, unless the White House makes specific inquiries of the NRC. FEMA will refer any White House queries about the condition of the facility to the NRC. NRC will provide FEMA (EST Director or SFO when at the site) with an onsite status report for inclusion in the FEMA reports to the White House. Any changes to the NRC onsite status report should be coordinated with NRC prior to transmittal to the White House.
12. As appropriate, the Director of FEMA, or his representative, will consult with, or convene meetings of, the Federal and other agencies involved with the accident to ensure consistency in the assessment of the situation and coordination of the Federal response. The FEMA Director will provide updates on response activities through the EST Director, to NRC, and other Federal agencies at Headquarters.

D. ON-SCENE EMERGENCY ORGANIZATION AND PROCEDURES

1. Some Federal agencies will have representation at the scene of an incident quite early when local representatives are located in the vicinity of a nuclear power plant (e.g., USDA extension agent). When the NRC site team arrives before a FEMA ERT, the site team leader or DSO will serve as a point of contact concerning Federal activities at the scene. The NRC site team leader should be informed of and be aware of which Federal agencies are at the scene and what general tasks they are carrying out. The NRC site team leader will keep the FEMA EST informed of any information available on this matter through the NRC Operations Center Staff. When the first components of the FEMA ERT arrive at the scene, the NRC site team leader will inform them of any information acquired and immediately relinquish this task.
2. The NRC requires the licensee to provide and maintain emergency response facilities to support emergency management of an accident. In addition, FEMA has the responsibility to provide a facility to ease the communication among the Federal agencies. The major on-scene response facilities are outlined below:
 - a. The Technical Support Center (TSC) is a licensee facility located on the plant site to be used by the licensee to manage the onsite response to any significant accident. This facility focuses on the operation of the reactor systems and other onsite activities. NRC staff will normally place several technical experts at this location to monitor the situation and provide advice and assistance to the licensee, as necessary.
 - b. The Emergency Operations Facility (EOF) is located off site but near the facility, and will be used by the licensee for the overall management of the accident. Senior licensee management personnel will coordinate their response with the government agencies from this location. The DSO will normally locate at this facility. The facility will have the capability to evaluate pertinent radiological, meteorological, and plant system data. The EOF will generally not be adequate to be utilized by all Federal and State personnel in coordinating offsite response activities. Another location (Federal Response Center) for Federal and State coordination should be preselected by FEMA.
 - c. The Federal Response Center (FRC) is a temporary on-scene facility established by the Federal Emergency Management Agency in conjunction with the State, to serve as a center of operations for activities of the Federal agencies. If possible, the FRC will be located near the EOF, but outside of the plume EPZ, to facilitate and simplify the communications requirements of the Federal agencies. The FRC will be equipped to provide each participating Federal agency communications capabilities to meet their on-scene requirements,

as well as to communicate from the FRC to regional and headquarters offices.

3. As a general principle, the SFO and his staff, other Federal agencies, and representatives of State agencies should all be located together. If possible, this should be near the EOF. A prearranged Joint Information Center (JIC)* should be located separately from the EOF and identified in advance by the utility. It is recognized that many State plans are not consistent with this general concept. Therefore, in developing the FEMA and NRC site-specific emergency plans, the Regional Offices should establish, in conjunction with the State involved, predesignated sites that meet the requirements of the general principle cited above as closely as possible.
4. When the NRC enters an Activation Mode, NRC Regional personnel and those at the site will normally deploy to the EOF, TSC, and the control room. Upon arrival, the SFO and members of the FEMA ERT will contact the NRC site team (usually at the EOF) and then go to predesignated locations.
5. As soon as the FEMA Regional Office is advised by the EICC that the NRC is in a Standby Mode, FEMA Regional personnel will contact the State and maintain continuing consultation with them. Appropriate Federal agencies, including FEMA, may send one or more staff people to the scene without a State request in order to observe the situation and assist in determining other actions that their agencies may need to take in support of NRC and the licensee.
6. The FEMA Regional Office will generally contact the State only when notified by the EICC that NRC is in a Standby or Activation Mode.
7. NRC Operations Center will advise the FEMA EICC of Notifications of Unusual Events or unplanned radiological releases (see B.1.b) reported to NRC. The NRC Region, at its discretion, will advise the appropriate FEMA Region of those events having a potential for general interest. If necessary, the FEMA Region should acquire further details and/or verification of any event involving an NRC licensed activity from its counterpart NRC Region, not directly from an NRC licensee.
8. When operational responsibility is transferred from the Director of the Executive Team at NRC Headquarters to the DSO, the DSO will usually establish his base of operations in the EOF. The DSO will be the principal link with the licensee. Other Federal agencies with responsibilities detailed in the FRERP are expected to locate principally at a Federal Response Center (FRC) preselected by FEMA, in conjunction with the affected State(s).

* It is recognized that various regions, States, and utilities give different titles to their media centers (e.g., media center, emergency news center, etc.). To recognize the intended joint (Federal, State, and utility) nature of this facility, these procedures will refer to such a center generically as a "Joint Information Center (JIC)."

9. Responding Federal agencies will communicate freely among themselves and with the appropriate State agencies and will keep the SFO advised, as necessary and appropriate. Throughout this process, a continuous flow of information between and among Federal and State agencies will be required to identify problems and coordinate actions required for their solution.
10. NRC will assist the SFO with interpretation of technical aspects of the situation. If the SFO is not located with the DSO, FEMA will provide a liaison officer in the EOF to facilitate the exchange of information and NRC will provide a liaison officer to the SFO location to provide the necessary technical interpretation of the situation.
11. Upon arrival at the scene, the SFO will arrange with State, NRC, DOE, and other Federal agencies, as appropriate, to be briefed on the situation and potential problems.
12. At an early time the SFO, supported by the NRC and other appropriate agencies, will consult with the Governor and appropriate staff to discuss the Federal support role in the developing situation.
13. The SFO will hold an initial Federal/State coordination meeting in order to establish contingency options and reporting requirements in dealing with the event. After the initial session, meetings will be called as required.
14. The SFO will ensure that the early Federal impact assessments for offsite recovery operations are in sufficient detail to provide adequate information to prepare the FEMA recommendation should the Governor request a Presidential Disaster Declaration.
15. On a continuing basis, the SFO and DSO will establish necessary procedures for the response effort and ensure a continuous exchange of critical information among the Federal, State, local, and volunteer agencies. The SFO will implement procedures to track the status of assistance requests and to keep the DSO informed of support activities.
16. The SFO will keep FEMA Headquarters advised about the developing situation and will provide to the EST indepth information on offsite events and status of actions. The NRC DSO will keep NRC Headquarters up to date on developing conditions and the response status.
17. The SFO will assist NRC/DOE in obtaining logistical support to deal with the requirements of the technical response. Before the SFO's arrival, requests for logistical support will be passed to the FEMA EST (located in the EICC) for action. Requests for

communication restoration and enhancements will be made to the SFO.

18. The NRC will assess the licensee's protective action recommendations and, if necessary, prepare independent recommendations for protective actions for State and local chief executives in accordance with NUREG-0845. NRC, in conjunction with the SFO, will ensure that all other significant factors impinging on the technical recommendations, including State input, are considered. Except in the case of imminent peril, where there is a need for an independent Federal recommendation, the SFO and the NRC DSO will provide a unified set of technical and other recommendations to responsible State officials.
19. In general, the coordination of recommendations and solutions to significant problems, which will be presented to the Governor, will be accomplished in the following manner:
 - a. For general problems, recommendations may be triggered by a State request or recognition of a problem by a Federal agency. For protective action recommendations, NRC, based on its technical assessment and that of other Federal agencies, and including FEMA's appraisal of the offsite status of preparedness measures, may confirm the State's or utility's recommendation or recommend a separate set of protective actions to the State.
 - b. As appropriate, individual Federal agencies will be asked to assist in the development of recommendations around a specific problem.
 - c. Except in cases of imminent peril, agencies will normally meet to review recommendations, assess their appropriateness and validity, compare the advantages and disadvantages of alternatives, and put in final form the recommendations to be made to the Governor. In addition to these meetings, NRC will take the lead in preparing the technical recommendations and in resolving issues related to the condition of the licensed activity and the real or potential offsite radiological impact.

E. FEDERAL/STATE INTERFACE PROCEDURES

1. Because States have existing arrangements for support from some Federal agencies and may contact whomever they please, the Federal/State interface needs to be particularly well coordinated in the two elements of a response that directly affect the public:
 - a. Proposed public information releases; and
 - b. Recommendations for protective actions.

2. For all other elements of the Federal/State interface, FEMA will work primarily with State emergency management agencies, and the NRC will work primarily with State radiological health personnel. Both will have other contacts, however, as will other Federal agencies. FEMA and NRC will keep each other apprised of their communication(s) and discussion(s) with State agencies. Rather than attempting to restrict contacts, FEMA and the NRC will attempt to provide the most complete sources of relevant information and encourage their use by all participants.

F. COORDINATION OF ONSITE/OFFSITE OPERATIONS

1. Disagreements in the field should be resolved by the SFO and the DSO. However, if issues cannot be resolved at that level, the SFO and DSO should refer them to their respective Headquarters for resolution. NRC will take the lead in resolving issues related to the condition of the licensed activity, protective action recommendations, radiological monitoring efforts, and the real or potential offsite radiological impact. FEMA will take the lead in resolving other issues.
2. In accordance with the Federal Radiological Emergency Response Plan, all Federal agencies performing offsite radiological assessment work will keep DOE informed about plans, activities, and results. State agencies, too, are encouraged to provide their radiological data to DOE. Offsite environmental evaluation and characterization will be developed at the Federal Radiological Monitoring and Assessment Center (FRMAC). These evaluations and supporting monitoring data will be provided to NRC and the State, generally at the EOF. After reviewing these results, placing them in context with other available information and determining any possible followup actions or recommendations, NRC will provide relevant information and data to the SFO, generally through a FEMA Liaison Officer at the EOF.
3. Any organization with which NRC has established working relationships, either before or during an incident, will be directly contacted by the NRC for assistance. In such situations, FEMA will be notified of the request as soon as possible. Requests for assistance to NRC from agencies with which a working relationship has not been established, will be made through the Response Coordination Team (RCT) at NRC Headquarters to the FEMA EST before the SFO arrives on the scene. After a DSO has been appointed and an SFO is available to handle assistance requests, direct requests may be made between the two. The DSO and the SFO should ensure that their respective Headquarters are apprised of requests made and honored.
4. For any situation in which there is a Presidential Major Disaster or Emergency Declaration, FEMA will have a preestablished funding and assistance mechanism.

5. All requests requiring the expenditure of funds should be processed and clearly documented for later payment. NRC and FEMA should document billing details appropriately. Approval by the NRC Director, Executive Team member, or DSO is required before any tasks can be carried out requiring authorization of NRC funds. All NRC requests for FEMA assistance will be in writing; however, most requests will be presented orally and followed up in writing within 24 hours. Oral requests for FEMA assistance should be honored only when made by the NRC Director at NRC Headquarters, the DSO at the site, or individuals specifically designated by the NRC Director or DSO.
6. Concern that a Federal agency is not following the FRERP should be referred to the SFO for resolution. Before the SFO arrives, recognized deviations from the FRERP should be referred to the FEMA EST.
7. Some time after the emergency has been brought under control and immediate public health and safety and property protective actions have been accomplished, the Federal government will play a key role in providing technical guidance and advice to State and local authorities with regard to further protective actions to reduce public exposure to radiation and radioactive materials, acquisition of additional data and information, termination of orders to the public, resettlement of populations, etc. FEMA will provide overall coordination of Federal assistance to the State in recovery planning.

The base of expertise in developing Federal technical positions is much broader than for developing immediate protective action recommendations which are based primarily on the status of reactor systems. NRC will provide appropriate personnel to those groups evaluating the technical concern in recovery planning.

However, irrespective of providing technical input to the recovery planning process, the DSO may, after consultation with the State, utility, and other Federal agencies, decide to deactivate or terminate NRC's position as CFA* and focus primarily on the recovery effort on site. Such a decision would be expected to be made after the onsite situation has stabilized and no further offsite releases are expected and EPA has assumed the lead for offsite radiological monitoring. The DSO will contact the SFO and provide him orally and in writing with the following information:

- ° Reason for deactivating its position as CFA
- ° The time when the deactivation is to take place

* The Federal Radiological Emergency Response Plan defines the CFA as: "The Federal agency that owns, authorizes, regulates or is otherwise deemed responsible for the radiological activity causing the emergency and that has the authority to take action on site."

- o The identity of NRC personnel and their expertise who will continue to be available to provide technical assistance to the State

If the SFO has no objection to the DSO request, the SFO will acknowledge orally and in writing his agreement with DSO position. If the SFO objects to the DSO request, he will provide the DSO with a timely and informative response.

Upon a final agreement that NRC will deactivate as CFA, FEMA will issue a statement informing the media of the agreement.

8. The SFO will review with the DSO a Federal agency's plans to deactivate their response. If withdrawal of resources will adversely affect onsite/offsite operations, the SFO will so notify that Federal agency.

G. THE ROLE OF THE SENIOR FEMA OFFICIAL (SFO)

This section describes FEMA's approach to meeting its response coordination role in the context of its expanded authorities. The SFO's role in responding to other civil emergencies is defined by Executive Order 12148.

1. Principles

- a. State and local governments, private relief organizations, and the private sector have the primary responsibility for responding to civil emergencies. Federal assistance will be provided only when effective response is clearly beyond the capability of these agencies.
- b. The Governor of the affected State will be advised of the designation of the SFO and will be asked to designate a counterpart State officer (State Coordinating Officer) to work with the SFO in assuring effective operating relationships between Federal, State, local, and private response efforts.
- c. The SFO will not perform any assistance delivery functions, nor will he have the authority to direct any Federal agency to do so. His sole function will be to serve as the focal point for the total Federal effort in the affected area, as the representative of the Director of FEMA and of the President.

2. Responsibilities of the Senior FEMA Official

- a. Damage Assessment. The SFO will perform, or cause to be performed, a comprehensive assessment of the civil emergency to include the magnitude and severity of its impact, the capabilities of State and local governments and private

agencies to deal with the situation, the types of Federal assistance that may be made available, and the impact on the affected area if Federal assistance is not forthcoming.

- b. Communications. The SFO will ensure that adequate facilities exist to permit effective communication between responding Federal agencies, between Federal and State representatives, and between the SFO and the FEMA EST.
- c. Coordination. The SFO will maintain an awareness of all Federal activities in the affected area to determine that Federal assistance is being provided in a timely, efficient, and effective manner, and to recommend improvements, as necessary, to the appropriate Federal agency or agencies. He will also establish and maintain close working relationships with his State counterpart, and private relief and other organizations to ensure a comprehensive and coordinated approach in providing assistance to the affected area.
- d. Information. The SFO will work with other Federal agency and State representatives to ensure that there is a mechanism to coordinate all Federal information releases made from the field to the news media and to Members of Congress and their staffs. The function of this system will not be to censor or otherwise transgress upon the relationships of Federal agencies, the media, and the Congress, but to provide a recognized central source of information and to ensure that the Federal effort is described comprehensively, consistently, and accurately.
- e. Reports. The SFO will develop and implement a reporting system to provide a periodic and comprehensive overview of Federal activities on scene and to display progress made toward meeting established goals. This system will also include significant activities of State, local, and private voluntary organizations, and will be the basis for the SFO Digest, and the SFO's input to the FEMA Director's report(s) to the White House. Information will be transmitted to the Director via the EST operating in the EICC.
- f. After-Action Report. The SFO will prepare an after-action report shortly after the cessation of the Federal activity in the affected area, summarizing significant actions taken during the incident, major decisions made, problems of coordination, and the incident. The evaluation will contain any recommendations for changes necessary in legislation, delegations of authority, and procedures needed to improve Federal response operations and interface procedures. The report will be submitted to the Director of FEMA for such further action as he deems necessary.

H. THE ROLE OF THE NRC DIRECTOR OF SITE OPERATIONS (DSO)

This section describes the NRC's approach to onsite management of Federal response activities. The DSO's role in responding to events at NRC licensed activities is described in detail in the NRC Incident Response Plan, NUREG-0728, Revision 1, and Agency Procedures for the NRC Incident Response Plan, NUREG-0845.

1. Principles

- a. The U.S. Nuclear Regulatory Commission (NRC) regulates nuclear activities, through licensing and inspection, to protect the health and safety of the public and to preserve environmental quality. In the event of an incident involving NRC-licensed activities that has the potential to threaten the public or the environment, the NRC must be prepared to respond quickly.
- b. During an incident at a licensed facility, the licensee is at all times responsible for mitigating the consequences of the incident. The licensee is also responsible for providing appropriate protective action recommendations to State/local officials.
- c. The underlying foundation for all Federal response activities is coordination with and support for State and local government and licensee response efforts. As part of its role as Federal technical coordinator during an emergency, the NRC is responsible for providing Federal recommendations to the appropriate offsite officials for actions to protect the public.
- d. The DSO will, in his capacity as NRC representative onsite and spokesman for the agency, adhere to the aforementioned principles and carry out the essential roles of:
 1. Monitoring licensee activities to assure appropriate protective action is being taken with respect to offsite recommendations.
 2. Support offsite authorities, including confirming the licensee's recommendation to offsite authorities.
 3. Support the licensee with respect to reactor safety and protective measures matters.
 4. Keep other Federal agencies and entities informed of the status of the incident.
 5. Keep the media informed of the NRC's knowledge of the status of the incident, including coordination with other public affairs groups.

2. Responsibilities of the Director of Site Operations

- a. Coordinates all NRC activities from the incident site.
- b. Evaluates incident and licensee actions to formulate advice and direction to licensee.
- c. Provides NRC assessments of protective actions (onsite and offsite).
- d. Maintains liaison with other Federal, State, and local organizations.
- e. Reviews and approves all NRC press releases.
- f. Reviews licensee press releases.
- g. Decides need for licensee exemption from prescribed operating procedures and technical specifications.
- h. May issue written orders to licensee after consultation with the NRC Director at headquarters.
- i. Coordinates requests for NRC headquarters support, as needed.
- j. Acts as NRC spokesman.
- k. Coordinates with NRC headquarters management.
- l. Assures FEMA SFO is kept informed.
- m. Implement CFA actions, as appropriate.

I. PUBLIC INFORMATION ORGANIZATION AND PROCEDURES

To provide the media with adequate and timely public information regarding a nuclear power plant accident, a Washington, D.C., information activity and an on-the-scene Joint Information Center* will be established as follows:

1. Notification and Initiation

- a. When NRC enters a Standby or Activation Mode, the FEMA EICC will alert FEMA's Director of Public Affairs of a developing situation; the NRC Operations Center will alert the NRC Office of Public Affairs.

* It is recognized that various regions, States, and utilities give different titles to their media centers (e.g., media center, emergency news center, etc.). To recognize the intended joint (Federal, State, and utility) nature of this facility, these procedures will refer to such a center generically as a "Joint Information Center (JIC)."

- b. The FEMA Public Affairs Officer (PAO) will contact the NRC PAO to exchange initial information and establish communications. The NRC PAO will serve as the single point of contact at the headquarters level for all Federal agencies.
- c. The SFO, will consult with the FEMA PAO** and the Public Information Officer (PIO) designated to serve on the ERT, and consider requirements for additional staff. The NRC Director of Public Affairs will provide staff for the NRC Operations Center and an on-the-scene NRC PIO in accordance with NRC response procedures.
- d. To the extent possible, NRC and FEMA PAOs will coordinate public information with other Federal agency PAOs, State and local public affairs officials, and licensee PIOs, via telephone conference calls or by exchange of press release drafts.

2. Organization and Operation

- a. The PIOs for the FEMA and NRC will operate under the direction of the SFO and DSO, respectively. They will advise their respective on-the-scene leadership about location and staffing of the JIC. This will be done after coordination with the State and local governments involved, and with the utility. If the utility does not predesignate a media center, the FEMA Region site-specific plan will predesignate a media center, in coordination with the State, NRC, and the utility. Preferably this will be at a Joint Information Center, predesignated and operated by the utility. The SFO's PIO will go to the location predesignated in the FEMA Region's site-specific plan.
- b. The NRC Director of Site Operations or his/her PIO shall initially assume primary Federal Government responsibility for operation of the JIC in conjunction with the owner/operator and/or State. FEMA will assume responsibility for coordination of Federal information activities at the JIC at a time that is mutually agreeable to FEMA and NRC. The responsibility for operating the JIC may be transferred to the SFO's PIO, if agreed to by the DSO at the site and the SFO, at a mutually acceptable time. FEMA PIOs at the scene will provide support to NRC when NRC has Federal operational responsibility for the JIC, including interfacing with or coordinating information activities of other Federal, State, or volunteer agencies with which FEMA has a program relationship at the scene.
- c. The SFO's PIO and NRC's PIO on the scene will establish and maintain contact with FEMA Headquarters and NRC Headquarters, respectively.

** In this section, "PAO" refers to a position at Headquarters and "PIO" indicates a Regional Office or site position.

- d. The SFO's PIO and NRC's PIO on the scene will establish, with State, local, licensee, and other agency PIOs, an arrangement for the central coordination of press releases, scheduling of regular news briefings, provision of interviews for electronic media, escort teams for media groups, etc.
- e. The SFO's PIO will ensure that other Federal agency PIOs operating in the JIC have adequate communications to facilitate their unimpeded receipt of substantive information from their own Headquarters.
- f. The SFO's PIO and the NRC's PIO will provide coordinated information to an information office for the Washington, D.C. area, expected to be located at the NRC offices in Bethesda, Maryland. The SFO's PIO and NRC's onsite PIO will establish and maintain contact with this Washington information office in order to be able to coordinate all sources of information.

Any new information, findings, decisions, predictions, etc., which FEMA or NRC in Washington might generate would have to be coordinated with the NRC and FEMA PIOs at the on-the-scene JIC, once established, before its release anywhere (including a Washington information center).

In addition to serving as an alternate releasing point for coordinated information, the Washington information center would be available to handle any overflow of telephoned news media inquiries. It also could serve as a platform for carefully selected, Washington-based experts to supply background information, provided this is coordinated in advance with the on-the-scene JIC.

J. CONGRESSIONAL LIAISON ORGANIZATION AND PROCEDURES

These guidelines are intended to assure that appropriate Members of Congress and Congressional committees are kept fully and currently informed in a coordinated manner.

1. Notification

When NRC enters a Standby or Activation Mode, the NRC Operations Center will notify the NRC Office of Congressional Affairs and the FEMA EICC. The FEMA EICC will notify the FEMA Office of Congressional Relations of the situation.

2. NRC OCA

NRC Congressional Affairs staff will be located at their offices at 1717 H Street, Washington, D.C. An NRC Congressional Affairs Officer will also be stationed at the NRC Incident Response Center in Bethesda, Maryland, NRC OCA will initiate contact with FEMA OCR and will maintain close and continuing liaison during the emergency.

3. Inquiries

As the CFA, NRC will be the single point of contact in the Washington, D.C. area for all Federal agency Congressional Liaison Officers and Congressional staffs, seeking site-specific emergency information. Inquiries from Members of Congress, Congressional committees and their staffs relating to the plant itself should be referred to the NRC Office of Congressional Affairs. Congressional inquiries relating to offsite emergency response measures can be referred to FEMA Office of Congressional Relations in Washington. Other agencies (e.g., DOE, EPA, USDA) may respond directly to general questions within their respective areas of expertise and on whatever roles they are playing in the emergency response but should keep NRC informed of these Congressional inquiries. However, questions relating to plant safety and status or offsite emergency planning should be referred to NRC or FEMA as appropriate.

Questions relating to the plant and within the purview of the NRC might include: What happened? How did it happen? What is the current status? What releases have occurred or might occur? What are the regulatory implications for other plants? Is the situation under control? What assistance is being provided by Federal, State, and local government and by private sources?

Questions relating to offsite planning and within the purview of FEMA might include: What offsite precautionary measures have been taken? What measures are called for by the emergency response plan? How are State and local authorities responding? What Federal participation is involved? How long will evacuation take? What provisions have been made to shelter evacuees? When may evacuees return to their homes? What measures have been taken to prevent pilferage in evacuated zones?

4. Onscene

A FEMA Congressional Relations Officer will be deployed to the scene of an emergency together with the SFO and will serve as the onscene point of contact for local Congressional inquiries about offsite emergency response preparations and activities and for coordinating Congressional visits to the area. After arriving onscene, the FEMA Congressional Relations Officer will initiate contact with the NRC Congressional liaison staff. The onscene FEMA Congressional Relations officer will maintain regular contact with the NRC Office of Congressional Affairs throughout the emergency.

5. Congressional Requests to Visit Site

Members of Congress and their staffs, including committee staffs, should be discouraged from attempting to visit the site or the EPZ during the emergency. Requests for permission to visit the site itself should be referred to the licensee. It is expected that an

NRC Congressional Affairs officer will accompany visits to the site by members or staff of any of its Congressional oversight committees following an emergency. Requests for representatives from Federal agencies to accompany Congressional visitors to the area should be coordinated by the FEMA Congressional Relations Officer at the scene with the other Federal agencies as appropriate. Congressional visitors will not be permitted at the NRC Operations Center in Bethesda during an emergency.

6. Informing Oversight Committees

FEMA and NRC are each responsible for keeping their Congressional oversight committees in Washington fully and currently informed of the situation. NRC Congressional liaison staff will inform the staff of the agency's principal oversight committees of significant changes in plant status affecting the public health and safety.

The NRC Office of Congressional Affairs will endeavor to arrange periodic telephonic briefings for key oversight committee members or staff by technical personnel. Whenever possible, efforts will be made to provide joint briefings by means of conference calls in order to minimize the time required of NRC technical staff. As usual, the Office of Congressional Affairs will assist the Commission, the Executive Director for Operations, and staff in preparing for Congressional briefings or oversight hearings related to the emergency.

7. Coordinating with Public Affairs Staffs

Both the FEMA and NRC congressional liaison staffs will maintain regular contact with their respective public affairs staffs, who will keep them informed of the scheduling of any press conferences by agency representatives and of any statements made to the public.

K. TRAINING AND EXERCISES

NRC and FEMA personnel training in the elements of these operational response procedures will be facilitated by:

1. Normal exchange of information incidental to routine reporting of events between respective Headquarters emergency operating centers.
2. Informal exchange of liaison officers between respective Headquarters elements for on-the-job training and orientation.
3. Occasional drills conducted for the purpose of accomplishing specific training objectives.
4. Participation in exercises involving both Headquarters elements of NRC and FEMA, and their respective Regional Offices.

5. Reviews of each agency's Response Plan.
6. Specific training courses for key members of the response teams.

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16. ABSTRACT (200 words or less)

Procedures have been developed by the U.S. Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA) which provide the response teams of both agencies with the steps to be taken in responding to an emergency at a commercial nuclear power plant. The emphasis of these procedures is mainly on the interface between NRC and FEMA at their respective Headquarters and Regional Offices and at the various sites at which such an emergency could occur. Detailed procedures are presented that cover for both agencies, notification schemes and manner of activation, organizations at Headquarters and the site, interface procedures, coordination of onsite and offsite operations, the role of the Senior FEMA Official, and the cooperative efforts of each agency's public information staff.

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NRC/FEMA OPERATIONAL RESPONSE PROCEDURES FOR RESPONSE TO A
COMMERCIAL NUCLEAR REACTOR ACCIDENT

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