



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 11, 1988

NOTE TO: Edward L. Jordan, Director, AEOD *JL*
THRU: R. Lee Spessard, Director, DOA/AEOD *2/11/88*
FROM: Bernard H. Weiss, IRB/DOA/AEOD
SUBJECT: EXERCISE GUIDANCE FOR EXERCISES WITHOUT STATE AND LOCALS

At the meeting last week between NRC and FEMA we discussed how we would approach the conduct and scheduling of the Shoreham exercise. At that time it was decided that Ed Podolak and Vern Wingert would develop general guidance for the FEMA regions for exercises that do not involve State and local participation. This would be in the form of what the objectives for such an exercise should be and what additional guidance would be necessary for FEMA to conduct such an exercise. I have not been directly involved in the development of this document although I have spoken several times to Ed Podolak mainly on the subject of whether "stand-ins" should be used in conducting the exercise. Podolak did ask me to attend a staff-level meeting on Wednesday, February 10, 1988 to defend my position that "stand-ins" are necessary for this exercise. I attended the meeting and argued that the guidance should not necessarily, at this point, discount either position, but the document could provide guidance for how this could be accomplished with "stand-ins" and without "stand-ins." Podolak argued that he would not do that because the wording in NUREG-0654, Rev. 1 (Enclosure 1) does not allow the use of "stand-ins". I am arguing that the wording is permissive and that "stand-ins" could be used, if necessary to to adequately evaluate exercise objectives.

At the staff level, we could not come to an agreement on this issue but we did agree that it should be escalated to you and Frank Congel. Congel called me to make sure that you would be available on Friday to discuss this issue. Jackie and I have arranged a lunchtime meeting (12 Noon, Friday) to try to come to some resolution. Lee will also be available.

At that meeting we will be discussing the guidance that Podolak and Wingert have already sent out to the FEMA regions for comment (Enclosure 2). I have some disagreements with the document, again, primarily related to the issue of "stand-ins." On Page 2 of the guidance, the additional objective implies that it is possible to adequately demonstrate the capability of the LERO organization to interface with State and local officials, provide appropriate briefings, request approval of certain actions that affect the public, etc. "through the mobilization of utility liaisons." I submit that what is called for in the Shoreham exercise, in particular, is a comprehensive testing of all the procedures that IILCO has developed to accommodate the presence of State and local officials and not just their mobilization.

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On Page 3, Item 4.b., there are instructions for how evaluators will make their evaluation of utility liaison personnel by interviews. I submit that this may be a valid technique to obtain a general understanding of the capability of a response organization. However, it is my judgement that it is not the best way to conduct "the demonstration of offsite response organization capabilities to interface with non-participating state and local government..." In order to most adequately demonstrate the utility response capability to interface with and accommodate State and local officials, particularly decisionmakers at the LERO EOC, there needs to be someone there who the utility person would interact with to determine how well they do their job under pressure conditions and whether this interfacing and accommodating interferes in some way with the utility response. Such a person (not a "stand-in"; call him/her a controller) would ask simple questions and not make any decisions, i.e., what do you want the official to do?, what is the basis for this action?, what does the plan say?, when will your analysis be ready?, brief me on the situation, etc. The FEMA evaluator would observe this interaction. There is, of course, the long-known downside to this approach, i.e., those individuals can be accused of asking the wrong questions or acting in an improper manner. Granted, but for some unknown reason this never came up in the first Shoreham exercise. The biggest problem with using the "evaluator-interview approach is that no matter how well the utility performs, the exercise may be considered inadequate because this aspect of the LILCO plan was not properly demonstrated.

CONCLUSION: The question for the meeting should not be "stand-ins or no "stand-ins." Rather, the discussion should be: is an evaluator interview adequate to demonstrate portions of the LILCO plan related to interfaces with state and local government or does something additional need to be done to assure that the LERO organization is given an appropriate opportunity to demonstrate the full capability of their plan.

Original Signed by
Bernard H. Weiss

Bernard H. Weiss, IRB/DOA/AEOD

Enclosures:

1. Page 24, NUREG-0654, Supp.1
2. 2/10/88 Memorandum from G. Petersen to FEMA Regional Directors

cc: T. J. McKenna, AEOD

Distribution:

- R. L. Spessard, AEOD
- K. E. Perkins, AEOD
- B. H. Weiss, AEOD
- IRB Reading File
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M. Exercises and Drills

Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Evaluation Criteria

1. a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which will require response by offsite response organizations. Exercises shall be conducted as set forth in NRC and FEMA rules.
- b. An exercise shall include mobilization of offsite response organization resources adequate to verify the capability to respond to an accident scenario requiring response. This includes the demonstration of offsite response organization capabilities to interface with non-participating State and local government, but does not include the use of standins for the anticipated State and local response. The offsite response organization shall provide for a critique of the biennial exercise by Federal and offsite response organization observers/evaluators. The scenario shall be varied from exercise to exercise such that all major elements of the plans and preparedness organizations are tested within a six-year period. Each organization shall make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. Exercises shall be conducted during different seasons of the year. At least one exercise shall be unannounced.
2. A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. A drill shall be supervised and evaluated by a qualified drill instructor. The offsite response organization shall conduct drills, in addition to the biennial exercise at the frequencies indicated below:

a. Communication Drills

Communications between the licensee and the offsite response organization within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal emergency response organizations and offsite response organizations within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, offsite response organization's operations centers, and field assessment teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages. If practicable, attempts should be made to include non-participating organizations in the monthly communications drills.

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MEMORANDUM FOR: Regional Directors
Acting Regional Director

FROM: Grant C. Peterson
Associate Director
State and Local Programs and Support

SUBJECT: Guidelines for Regions to Use In Implementing
NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 1
With Exercises

The attached guidelines are provided for your use in implementing the criteria of NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 1 for exercise preparation and evaluation wherein State and/or local governments decline to participate in emergency planning and exercises. These guidelines are provided for your interim use, review and comment. These guidelines will become Amendment 1 to Guidance Memorandum (GM) EX-3, to be issued soon.

The catalyst for the development of these guidelines is the December 7, 1987, Atomic Safety and Licensing Board ruling on the adequacy of the January 1986 Shoreham exercise. The crux of this ruling is that this exercise did not meet NRC regulatory requirements for a qualifying exercise under 10 CFR 50, Appendix E.IV.F.1. These guidelines address the issue of qualifying exercises for NRC licensing as well as any exercises in which State and/or local governments are not participating.

As stated above, this guidance is intended only for those exercises in which State and/or local governments do not participate. The existing modular format should continue to be used in conjunction with the evaluation criteria of Supplement 1. The modular format is being revised by Headquarters and will include a section on the use of Supplement 1. For now, the existing modular format should be used along with the evaluation criteria in Supplement 1 and this amendment for evaluating exercises where State and/or local governments do not participate.

Distribution of these interim guidelines and request for review and comments by FEMA will be accomplished through the normal procedures set forth for GM's in GM IT-1. Comments should be provided to FEMA Headquarters by April 8, 1988. Any questions concerning this matter should be addressed to Vern Wingert at 646-2872.

Attachment

ENCLOSURE 2

GM EX-3 AmendmentPurpose

1. This document amends the guidance in GM EX-3 for use with exercises of commercial nuclear power plants where State and/or local governments decline to participate in the emergency planning and exercises. The amendment delineates what constitutes an adequate demonstration of those exercise objectives pertaining to functions for which utilities are dependent upon State and/or local governments for legal authority to carry out their emergency responsibilities.

This amendment will assist evaluators in determining the knowledge and capability of the utility offsite response organization personnel to advise and assist State and local officials in implementing those portions of the offsite plan where State and local response is identified.

2. This amendment is linked to the planning standards and evaluation criteria in NUREG-0654/FEMA-REP-1, Rev.1, Supp. 1.
3. This amendment will address the application of the 35 exercise objectives of GM EX-3 to exercises in which State and/or local governments which have not participated in emergency planning process do not participate in exercises with utility.

Guidance

1. The nature of the qualifying exercise is stated in 10 CFR 50, App. E. IV. F. (1), "This exercise shall be conducted within two years before the issuance of the first operating license for full power and prior to operation above 5% of rated power of the first reactor, and shall include participation by each State and local government within the plume exposure pathway EPZ and each State within the ingestion exposure pathway EPZ."

- This exercise will be used by NRC to make its licensing decision.

- 10 CFR 50 states "a full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located for which the first operating license for that site is issued after July 13, 1982."

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2. For qualifying exercise under Supp. 1., the utility must fully demonstrate 35 exercise objectives. This consists of 34 of the existing exercise objectives in EX-3, plus an addition of one to incorporate evaluation criteria of Supp. 1.
 - Objective 35, unannounced and off-hours exercises, does not apply to a qualifying exercise.
 - A new objective that parallels the Supp. 1 guidance states, "Demonstrate the capability to interface with non-participating State and local governments through the mobilization of utility offsite response organization personnel who would advise and assist non-participating State and local officials in carrying out their emergency responsibilities." (N.1.b., E.6., C.5.)
3. Among the 35 objectives to be demonstrated at a qualifying exercise, below is a list of those objectives that may be legal authority-sensitive, depending upon the specific provisions of offsite plans being tested:
 - a. Objective 11. Plume Protective Action Decisionmaking (J.10.m)
 - b. Objectives 12, 13, 15. Alert, Notification and Emergency Information (E.6)
 - c. Objectives 16, 17. Use of KI (J.10.e,f.)
 - d. Objectives 18, 19. Implementation of Protective Actions (J.9., J.10.d.,g.)
 - e. Objective 20. Traffic Control (J.10.j.,k.)
 - f. Objectives 23, 24. Medical Services (Transportation and Facilities) (L.4, L.5.)
 - g. Objective 25. Decontamination (K.3.a.,b.)
 - h. Objective 26. Supplementary Assistance (Federal/Other) (C.1.a.,b.)
 - i. Objective 30. Ingestion Exposure Pathway (J.9., J.11)
 - j. Objective 32. Recovery, Reentry and Relocation (M.1.)
4. The demonstration and evaluation of the above objectives should be carried out in accordance with the following guidelines:
 - c. The demonstration and evaluation of the objectives should follow the specific provisions of the plan being tested. For example,

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the activation and deployment of utility offsite response organization personnel should be performed at the emergency classification level designated in the plan. Also, the issue of securing authority by the utility offsite response organization should follow the procedures contained in the plan such as the general deputization of utility offsite response organization personnel or the ad hoc securing of authority on a case-by-case basis.

- b. Consistent with the guidelines in Supp. 1, evaluation criteria N.1.b., "An exercise shall include mobilization of offsite response organization resources adequate to verify the capability to respond to an accident scenario requiring response. This includes the demonstration of offsite response organization capabilities to interface with non-participating State and local government, but does not include the use of standing for the anticipated State and local response":
 - 1.) Contacts with State and local governments shall be simulated;
 - 2.) Exercise evaluators may ask the utility offsite response organization personnel questions regarding their function and how they intend to advise and assist State and local officials and they may raise other questions related to the exercise play.

Coordination

This document has been coordinated with and concurred in by NRC staff.



Federal Emergency Management Agency
Washington, D.C. 20472

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Guidance Memorandum EX-3

MANAGING PRE-EXERCISE ACTIVITIES AND POST-EXERCISE MEETINGS

PURPOSE

This Guidance Memorandum (GM) provides guidelines for managing pre-exercise activities and post-exercise meetings in support of the Federal Emergency Management Agency's (FEMA) Radiological Emergency Preparedness (REP) Program.

BACKGROUND

Under 44 CFR 350, it is the responsibility of a State and its local governments to conduct joint exercises to test their REP plans as a condition of initial and continued FEMA approval of these plans. The predecessor GM 17, dated January 8, 1981, provided procedural guidance intended to improve the conduct of exercises and to establish greater uniformity among the FEMA Regions in this activity. While progress has been made, there is still diversity among Regions. This revision is a further effort at achieving uniformity in preparing for, conducting and assessing exercises. It supersedes the January 8, 1981, GM 17 and the 35 exercise objectives contained in attachment 2 of the August 5, 1983, memorandum.

GUIDELINES

I. Pre-exercise Activity

Past experience has shown that joint exercises must be planned considerably in advance and each step scheduled. In order to ensure optimum results, the following milestones should be met, at a minimum. These milestones are predicated on the biennial exercise frequency; if exercises are conducted more frequently than biennially, the milestone time frames placed in parentheses should be used.

MILESTONES FOR EXERCISE EVALUATION

<u>No Later Than Days Prior to Exercise</u>	<u>Required Action</u>
90 days (75)	State and licensee jointly develop and submit exercise objectives to FEMA and Nuclear Regulatory Commission (NRC) Regional Offices.
75 days (60)	FEMA and NRC Regional Offices complete reviews of objectives and extent of play after meeting with licensee/State, if necessary.
60 days (45)	State and licensee submit exercise scenario to FEMA and NRC Regions for review.
45 days (35)	FEMA and NRC Regions contact or meet with State and licensee to discuss modifications and complete the scenario. Agreed upon changes or modifications should be documented and distributed.
35 days (optional) (30)	Regional Assistance Committee (RAC) Chair calls Controller's meeting to develop coordination of exercise.
30 days (25)	FEMA and NRC Regions develop specific post-exercise activity schedule for debriefings and meetings with the State.
15 days	<p>The RAC Chair (and NRC team leader as available) develops evaluator action plan (where stationed, how many from each organization, what to look for).</p> <p>The product of this will be the exercise evaluator packet which includes the specific evaluation location assignment. The packet should provide:</p> <ul style="list-style-type: none">o Portions of the plan applicable to their assignment;

- o A list of all exercise evaluators and their assignments;
- o A time-line of events;
- o Scenario summary;
- o Scenario technical data as required for those assigned;
- o Past exercise findings;
- o Applicable controller messages;
- o Applicable reference materials;
- o Logistic information and
- o Log forms for taking notes.

1 day

All Federal evaluators, both onsite and offsite, meet in the exercise area to receive orientation and final instructions.

Exercise Day (ED)

Conduct Exercise. Evaluators hold Exit Interviews with participants (at assigned locations).

ED+1

Evaluator Debriefing conducted by RAC Chair.

ED+1 or 2

NRC holds onsite Exit Meeting.

ED+1

Public Meeting is held by the RAC chairperson and the State(s).
 (Qualifying Exercise)
 Participants Meeting is conducted by RAC Chair.
 (Continuing Approval Exercises)

ED+30

Draft FEMA exercise evaluation report sent to State(s).
 Report issued.

Whenever an exercise is scheduled, the Region should promptly assure construction of a time line based on the above milestones and make it available to the State, RAC Members, NRC Region, and FEMA Headquarters. Where a plant is located on a Regional boundary, the Region in which the

plant is actually located is considered the lead Region for purposes of scheduling, coordination and establishing the time line. Adhering to the time line should permit ample time to review and negotiate any changes to the exercise objectives and the exercise scenario. However, should delays occur which may affect the scheduled exercise date, the Regional Director shall so advise the State, the NRC Region, the RAC Members, and FEMA Headquarters. The FEMA Regional Office should make every effort to rectify slippage in the timetable to avoid rescheduling the exercise date.

The objectives for the offsite portion of the exercise should be taken from this document's list of 35 in Section III, Exercise Objectives. These exercise objectives functionally restate the intent of those evaluation criteria in NUREG-0654/FEMA-REP-1 that can be demonstrated and observed in exercises. They are restated in order to facilitate the use of these evaluation criteria for evaluating exercise performance. They also constitute the "major elements" of offsite emergency planning and preparedness that are to be tested at least once every six years as set forth in NUREG-0654/FEMA-REP-1 evaluation criterion W.i.b. as revised in GM PR-1 (page 2). Therefore, the objectives should be selected in order to test all major elements at least once every six years. Some objectives, because of their importance to adequate emergency response, are to be included in each biennial exercise for each participating organization. This set of exercise objectives, referred to as the "core objectives," are listed in Group A of Section III of this document. The initial six-year period began on the date of the first joint exercise after November 3, 1980, the effective date of the NRC rule, 10 CFR 50 (see GM PR-1). However, objective 9 is new as are the milestone dates for exercise evaluation. This new objective and the new milestone schedule should be implemented with all joint exercises beginning in calendar year 1989.

The objectives for each exercise shall be reviewed by both the FEMA and NRC Regional Offices before specific scenarios are written. Once reviewed, the State and licensee shall develop a scenario for submission which will include, at a minimum:

- o The exercise objectives;
- o The date(s), time period, place(s), participating organization(s) and extent of State and local government participation (i.e., full or partial);
- o A time schedule of all key events;
- o Identification of simulated events and activities;

- o A chronological narrative of exercise events and activities and
- o Appropriate radiological offsite release data with appropriate values for dose calculations, dosimetry, field monitoring and meteorological data.

FEMA and NRC Regions will coordinate the review of the scenario and notify the State and licensee of any necessary modifications. If necessary, a meeting to discuss modifications should be held. If agreement cannot be reached, FEMA and NRC Headquarters assistance should be sought.

II. Post-exercise Debriefings and Meetings

- A. Three audience groups may be involved in post-exercise meetings:
 1. Evaluators,
 2. Exercise Participants and
 3. Public/Media.

The timing and intent of the meetings may vary depending upon whether the exercise is conducted in advance of FEMA 350 approval (qualifying exercise), for continued 350 approval or after a remedial exercise.

- B. The following chart illustrates post-exercise meeting requirements for qualifying exercises and exercises for continued FEMA approval.

<u>QUALIFYING EXERCISE</u>	<u>CONTINUED APPROVAL EXERCISE</u>
Evaluator/Participant Exit Interview	Evaluator/Participant Exit Interview
Evaluator Debriefing	Evaluator Debriefing
Exercise Participants Briefing	Exercise Participants Briefing
Public Meeting	Meeting to which public and media are invited.

- C. Guidance on each type of debriefing/meeting follows.

1. Evaluator/Participant Exit Interview (for qualifying and continued approval exercises): Immediately following the conduct of the exercise, an exercise evaluator exit interview with the participants should be held at their assigned locations, as appropriate, to briefly provide a preliminary assessment of the exercise participants' strengths and weaknesses. No attempt should be made to categorize exercise performance inadequacies as "deficiencies" or "areas requiring corrective actions" (ARCA). Also, no indication of a "bottom line" finding on emergency preparedness at these locations should be made.

2. Evaluator Debriefing: Soon after the exercise, the RAC Chair should hold debriefings for all evaluators. These debriefings may be conducted by team leaders selected by the RAC Chair. The purpose of these debriefings is to secure accurate and complete information from the evaluators per their assignments to provide the RAC Chair with the basis for each finding as presented during the Exercise Participants' Briefing. During this same period, the NRC team leader conducts a parallel meeting with the NRC evaluators of onsite performance in the exercise.

If exercise deficiencies are indicated which would trigger remedial action, the RAC Chair shall report same to FEMA Headquarters by telephone, per GM EX-1. Following the RAC Chair's telephone contact with FEMA Headquarters, this debriefing can serve as the initial step in the consultation process required in GM EX-1.

3. Exercise Participants Briefing (for qualifying and continued-approval exercises)

a. As soon as possible after their independent interviews, the RAC Chair and the NRC team leader should meet to coordinate and arrange for Federal participation in the joint Exercise Participants' Briefing.

b. Within 48 hours of the completion of an exercise, a briefing involving the exercise participants, RAC Chair, NRC representative and other RAC members and Federal evaluators, as appropriate, should be held to discuss the preliminary results of the exercise. This briefing should be held in accordance with 44 CFR 350.9(a) and (d).

- c. Recommended agenda to be used is as follows:
- i) Review of onsite actions presented by NRC;
 - ii) Licensee presents their views (clarifying questions or comments);
 - iii) Review of offsite actions by RAC Chair;
 - iv) State and local governments present their views (clarifying questions or comments);
 - v) Review of Federal response (if applicable) by RAC Chair and
 - vi) Opportunity for clarifying questions or comments by licensee, State and local governments.

d. The presentations should comprise a brief, integrated overview covering the highlights of the exercise. Included in the presentation should be appropriate commendation(s) for good performance and a preliminary assessment of the participants' strengths and weaknesses. At this stage, no attempt should be made to categorize exercise performance inadequacies as "deficiencies" or ARCA's. Also, no indication of a "bottom line" finding should be made as to whether State or local preparedness is adequate.

e. As soon as possible after this briefing, the RAC Chair, through the consultation process, should provide the State with a tentative identification of the exercise inadequacies, if any, by classification, i.e., "deficiencies" and ARCA's. Again, no indication of a "bottom line" finding should be made as to whether State or local preparedness is adequate.

4. Public Meeting (for qualifying exercises)

- a. A public meeting in accordance with 44 CFR 350.10 should be held as soon as possible after the exercise in the vicinity of the nuclear power facility. This meeting shall be noticed in the local media in accordance with 44 CFR 350.10. Exercise participants, representatives from the NRC and other appropriate Federal, State and local agencies should attend.

- b. The meeting should acquaint members of the public with appropriate State and local emergency plans and the results of the exercise, including strengths and weaknesses observed. The meeting should also answer any questions about FEMA's review and evaluation, and receive suggestions from the public for improvements or changes.
 - c. During this Public Meeting an assessment of the exercise participants' performance should be made. The timing of the Public Meeting with relation to the post-exercise evaluation procedures will dictate the degree to which the RAC Chair can address the exercise participants' performance. When the consultation process has progressed to the point of agreement on the degrees of inadequacies in the exercise participants' performance, these inadequacies can be discussed in their proper categorization, i.e., "deficiencies" and ARCA's. When an agreement on the inadequacies in the exercise participants' performance has not been reached, discussions should be more general, i.e., in terms of strengths and weaknesses.
 - d. For situations in which a Public Meeting has been held during the 350 approval process and, thereafter, a plan amendment is submitted which significantly changes the context or nature of the planning [e.g., a change in the emergency planning zone (EPZ) results in the inclusion of additional jurisdictions], the FEMA Regional Director shall determine whether the amendment necessitates holding another Public Meeting.
5. Meeting for Continued FEMA Approval Exercises

- a. Following an exercise for continued FEMA approval, a meeting involving exercise participants, representatives from the NRC, other appropriate Federal agencies, the public and the media should be held in accordance with 44 CFR 350.9(e) in the vicinity of the nuclear power facility. This meeting shall be noticed in the local newspaper with the largest circulation in the area, or other media as the Regional Director may select, within five to seven days of the exercise date. At the discretion of the Regional Director, this meeting may be

combined with the exercise participants briefing.

- b. The public and media may attend the meeting as observers. At the discretion of the Regional Director, written questions from the public and media may be submitted at or after the meeting for consideration in the exercise evaluation. The Regional Director may further use his/her discretion to solicit and respond to oral questions and comments during this meeting. Under no circumstances should it be indicated whether State or local preparedness is adequate or inadequate.
- c. During the meeting, the RAC Chair should offer an overview of the exercise and should provide his/her observations. Comments from the RAC members and FEMA evaluators may be solicited at the discretion of the RAC Chair.

6. "Meetings" for exercises conducted during 350 approval process: Requirements in 44 CFR 350 do not address the conduct of "meetings" for exercises, held after the initial qualifying exercise but before the completion of the 350 approval process. For such exercises, a meeting as described in 350.9(e), i.e., a meeting conducted for continuing FEMA approval exercises, should be held. FEMA's evaluation of such "interim" exercises is an integral part of FEMA's overall 350 approval process. Again, the Regional Director may exercise further discretion by giving the public and the media an opportunity to orally discuss the performance of the exercise and the preliminary evaluation.

7. "Meetings" after remedial exercises: After remedial exercises required under 44 CFR 350.9(a) and 9(c)(5), it is necessary to hold a debriefing (item II.C.2. above) and may be necessary to hold a meeting (item II.C.3. above). Because remedial actions may vary from remedial exercises involving many organizations to drills including only one or two organizations, discretion is given to the Regional Director to determine the need to convene a meeting to which the public and media are invited, in accordance with 44 CFR 350.9(e).

III. Exercise Objectives

The following list of 35 exercise objectives is to be incorporated into the design of REP exercises. These objectives are correlated to the original 35 exercise objectives from the August 5, 1983, memorandum by the numbers provided in parentheses following the text of each objective.

The objectives are presented in three groups. Group A, numbers 1-15, are "core objectives" that are to be demonstrated in each biennial exercise. Core objectives represent fundamental emergency preparedness capabilities needed by all organizations for effective response to radiological emergencies. These objectives are scenario independent and, therefore, need to be demonstrated by all organizations in each biennial exercise. For all 35 objectives, the need for organizations to demonstrate these capabilities is dependent upon their assigned plan responsibilities.

Group B objectives, numbers 16-25, also represent fundamental radiological emergency response capabilities and should be demonstrated in each biennial exercise. However, these objectives are scenario dependent and may only impact some organizations. Scenarios should be varied from exercise to exercise to ensure that these objectives are demonstrated by each appropriate offsite emergency response organization at least once every six years. Some organizations may need to demonstrate these objectives more frequently because of factors such as: (1) Geographical location and size of jurisdictions, (2) use of 360 degree evacuation for a significant part or all of the plume Emergency Planning Zone and (3) need to retest capabilities previously evaluated as areas requiring corrective action. If the presence of such factors causes an undue hardship for an organization, appeals may be made to FEMA Regional Directors under 44 CFR 350.9(c) to seek relief from having to demonstrate some of the Group B exercise objectives more than once every six years.

Group C objectives, numbers 26-35, while not as critical as the more primary and time-sensitive Group A and B objectives, also represent important emergency preparedness capabilities. For example, the ingestion-related objectives (29-31) include functions that generally would not have to be implemented immediately to protect public health and safety. Group C objectives need only be demonstrated once every six years.

Each of the exercise objectives in Groups B and C should be demonstrated during an exercise within the initial six-year period and then tracked individually to ensure inclusion in exercises within six-year intervals. For example, if the initial six-year period for an offsite response organization began June, 1982 and a shift change (Objective 33) was demonstrated during the June, 1984 exercise, this objective must be demonstrated again at the latest by the end of calendar year 1990.

GROUP A - CORE OBJECTIVES THAT ARE SCENARIO INDEPENDENT

OBJECTIVE 1

NUREG-0654/
FEMA-REP-1

EMERGENCY CLASSIFICATION LEVELS

1. Demonstrate the ability to monitor, understand and use emergency classification levels (ECL) through the appropriate implementation of emergency functions and activities corresponding to ECL's as required by the scenario. The four ECL's are: Notification of unusual event, alert, site area emergency and general emergency.

D.3.4.

MOBILIZATION OF EMERGENCY PERSONNEL

2. Demonstrate the ability to fully alert, mobilize, and activate personnel for both facility and field-based emergency functions. (See Objective 33 for 24-hour, continuous staffing function within a six-year time frame). (1)

E.1.,
E.2.

DIRECTION AND CONTROL

3. Demonstrate the ability to direct, coordinate and control emergency activities. (3)

A.1.d.,
A.2.c.

COMMUNICATIONS

4. Demonstrate the ability to communicate with all appropriate locations, organizations and field personnel. (5)

F.
(not F.1.f.)

FACILITIES EQUIPMENT AND DISPLAYS

5. Demonstrate the adequacy of facilities, equipment, displays and other materials to support emergency operations. (4)

G.3.a.,
H.2.3.

EMERGENCY WORKER EXPOSURE CONTROL

- 6. Demonstrate the ability to continuously monitor and control emergency worker exposure. (20) K.3.a.b

FIELD RADIOLOGICAL MONITORING

- 7. Demonstrate the appropriate equipment and procedures for determining field radiation measurements. (7) I.8.,
I.11.
- 8. Demonstrate the appropriate equipment and procedures for the measurement of airborne radiiodine concentrations as low as 10⁻⁷ microcurie per cc in the presence of noble gases. (8) I.9.
- 9. Demonstrate the ability to obtain samples of particulate activity in the airborne plume and promptly perform laboratory analyses so that projections can be made of the area requiring relocation. (This objective has relevance to making reentry decisions, Objective 32.) (New Objective) I.10

PLUME DOSE PROJECTION

- 10. Demonstrate the ability, within the plume exposure pathway, to project dosage to the public via plume exposure, based on plant and field data. (15) I.10.

PLUME PROTECTIVE ACTION DECISIONMAKING

- 11. Demonstrate the ability to make appropriate protective action decisions, based on projected or actual dosage, EPA PAG's, availability of adequate shelter, evacuation time estimates and other relevant factors. (10) J.10.m.

ALERT, NOTIFICATION AND EMERGENCY INFORMATION

- 12. Demonstrate the ability to initially alert the public within the 10-mile EPZ and begin dissemination of an instructional message within 15 minutes of a decision by appropriate State and/or local official(s). (13) E.6.

16

- | | |
|--|---------------------|
| 13. Demonstrate the ability to coordinate the formulation and dissemination of accurate information and instructions to the public in a timely fashion after the initial alert and notification has occurred. (14, 25) | E.5.
G.4.b.
- |
| 14. Demonstrate the ability to brief the media in an accurate, coordinated and timely manner. (24) | G.3.a.,
G.4.a. |
| 15. Demonstrate the ability to establish and operate rumor control in a coordinated and timely fashion. (26) | G.4.c. |

GROUP B - SCENARIO-DEPENDENT OBJECTIVES

USE OF KI

- | | |
|--|-----------|
| 16. Demonstrate the ability to make the decision to recommend the use of KI to emergency workers and institutionalized persons, based on predetermined criteria, as well as to distribute and administer it once the decision is made, if necessitated by radiiodine releases. (21,22) | J.10.e.f. |
| 17. Demonstrate the ability to make the decision, if the State plan so specifies, to recommend the use of KI for the general public, based on predetermined criteria, as well as to distribute and administer it once the decision is made, if necessitated by radiiodine releases (21,22) | J.10.f |

IMPLEMENTATION OF PROTECTIVE ACTIONS

- | | |
|--|--------------------|
| 18. Demonstrate the ability and resources necessary to implement appropriate protective actions for the impacted plume EPI population, (including transit-dependent persons), special needs populations, handicapped persons and institutionalized persons. (15) | J.9.,
J.10.d.g. |
| 19. Demonstrate the ability and resources necessary to implement appropriate protective actions for school children within the plume EPI. (19) | J.9.,
J.10.g. |

TRAFFIC CONTROL

20. Demonstrate the organizational ability and resources necessary to control evacuation traffic flow and to control access to evacuated and sheltered areas. (16,17) J.10.j.k.

RELOCATION CENTERS (REGISTRATION, MONITORING, CONGREGATE CARE AND DECONTAMINATION)

21. Demonstrate the adequacy of procedures, facilities, equipment and personnel for the registration, radiological monitoring and decontamination of evacuees. (27) J.12.
22. Demonstrate the adequacy of facilities, equipment and personnel for congregate care of evacuees. (28) J.10.h.

MEDICAL SERVICES (TRANSPORTATION AND FACILITIES)

23. Demonstrate the adequacy of vehicles, equipment, procedures and personnel for transporting contaminated, injured or exposed individuals. (30) L.4.
24. Demonstrate the adequacy of hospital facilities, equipment, procedures and personnel for handling contaminated, injured or exposed individuals. (31) L.1.

DECONTAMINATION

25. Demonstrate the adequacy of facilities, equipment, supplies, procedures and personnel for decontamination of emergency workers, equipment and vehicles and for waste disposal. (29) K.5.a.b.

GROUP C - OTHER OBJECTIVES TO BE DEMONSTRATED AT LEAST ONCE EVERY SIX-YEARS

SUPPLEMENTARY ASSISTANCE (FEDERAL/OTHER)

26. Demonstrate the ability to identify the need for and call upon Federal and other outside support agencies' assistance. (32) C.1.a.b.

INGESTION EXPOSURE PATHWAY

- 27. Demonstrate the appropriate use of equipment and procedures for collection and transport of samples of soil, vegetation, water, and milk. (9) I.6.,
J.11.
- 28. Demonstrate the appropriate lab operations and procedures for measuring and analysing samples of food crops, milk, meat, poultry, water and animal feeds indigenous to the area. (9) C.3.,
J.11.
- 29. Demonstrate the ability to project dosage to the public for ingestion pathway exposure and determine appropriate protective measures. (11) I.10.,
J.9.,
J.11.
- 30. Demonstrate the ability to implement both preventive and emergency protective actions for ingestion pathway hazards based on field data, FDA PAG's and other relevant factors. (12) J.9.,
J.11.

RECOVERY, REENTRY AND RELOCATION

- 31. Demonstrate the ability to estimate total population exposure. (34) M.4.
- 32. Demonstrate the ability to determine and implement appropriate measures for controlled reentry and recovery based on estimated total population exposure, available EPA PAG's and other relevant factors. (35) M.1.

MOBILISATION OF EMERGENCY PERSONNEL (24-HOUR, CONTINUOUS BASIS)

- 33. Demonstrate the ability to maintain staffing on a continuous 24-hour basis by an actual shift change. (2) ~~A.1.e.,
A.1.~~

EVACUATION OF ONSITE PERSONNEL

- 34. Demonstrate the ability to coordinate the evacuation of onsite personnel. (23) B.6
J.2.
- 35. Demonstrate the ability to carry out emergency response functions (i.e., activate EOC's, mobilize staff that report to the EOC's, establish communications linkages and complete telephone call down) during an unannounced off-hours drill or exercise.

IV. CORRELATION OF EXERCISE OBJECTIVES WITH LEVELS OF EXERCISE

As set forth in 44 CFR 350.2(j)(k), there are two levels of participation in exercises, full and partial participation. In demonstrating exercise objectives in full participation exercises, the objectives should be fully demonstrated in both facility and field operations. In demonstrating exercise objectives in partial participation exercises, the objectives should be fully demonstrated in all facilities while field operations may be simulated.

V. IMPLEMENTATION

The provisions of this GM should be implemented 120 days from the date of this memorandum. There are two exceptions to this implementation time frame: (1) the expanded milestone dates (e.g., from 75 days to 90 days) for the initial milestone and (2) exercise objective 9. These should be implemented in all joint exercises to be held beginning in calendar year 1989.

VI. COORDINATION

This GM has been coordinated with and concurred in NRC staff.

FEMA Meeting with LILCO

John W. Wismar, LLC (Corporate responsibility for Chevron & Piner)
Needed to leave room for certain areas,

?? ERG will rely on on 11/1 to distribute material in
10-50 mile impact zone. ?? Should LILCO-

Str from Hunter + Williams ~~representing~~ representing both
Seabrook + Shoreham asking for meeting on dates

Reception Centers -

Can't put trailers at LILCO sites for
reception centers. Legal restrictions.
Will by April 29 have the best info available
and probably a way of exercising them. What
they can do in the exercise in view of the
litigation.

~~ERG - will get the authority~~

~~ERG~~ Drill will be conducted
about 2 weeks before exercise, possible
week of May 16 or 23.

LILCO has offered to have a meeting on the

C/2

Tentative meetings w/ FEMA and LCC.

April 29

~~May~~

At this point Weissmantle left the room.

School Districts -

FEMA Guidance - 1 school in each school district in every exercise. Can be done out of sequence.

Need opinion from FEMA HQ: re applicability of EV. School districts are independent of State.

* Question of whether they are independent and should be ^{considered} non-participating State and local governments.

Connecticut

Still up in the air.

If Conn won't play, LILCO will not develop any compensating measures since Conn. has a plan.

Other Fed Participation

* Should we & other Fed be doing anything? LILCO ~~thought~~ ^{may send} ~~that this is a letter~~ that says ^{will} NRC ~~is~~ play

Exercise will be 3 days
Plume
Ingestion
Reentry & Recovery

~~No sirens will be sounded, ^{and} sirens~~
~~REP-10~~

Will sound sirens but not a REP-10. Will
tell the public that ~~a~~ sirens will be sounded.

* In excess of P A C's in the IRPA beyond
the first tier (first wind direction).

* Should offsite objectives be allowed to be
released as it ~~is~~ routinely is.

Final approval of objectives will tell LILCO
what they can or cannot release.

* Can we talk to the Board re a discussion
on how we will work the Control Cell.

MEET WITH LILCO AT FEMA HQ - APRIL 8, 1988

1. Revision 9, RAC comments
2. Revision 10, highlights
3. Outside Organization Participation Expectations
 - a. New York State - None
 - b. Suffolk County - None
 - * c. School Districts - *Spent little time, in school districts, response not good. Unknown as to expectations of participation.*
 - d. Nassau County - None
 - * f. Connecticut - *Willing to pay for participation of Conn. if seen by state.*
 - g. Special Facilities - *Have not participated, but the federal government is not participating.*
 - h. Department of Energy - *Have an interest in cooperation, but not participating.*
 - i. U. S. Coast Guard - *BNL will participate, but not participating.*
 - j. American Red Cross - *Have not participated, but not participating.*
 - * k. Other Federal Participation - *Not participating, but not participating.*
4. Schedule (GM EX-3 Milestones)
5. Other Deliverables
6. FEMA needs from LILCO prior to exercise
7. LILCO needs from FEMA prior to exercise
8. Schedule next meeting
- *9. June 1988 Graded Exercise Planning
 - a. Exercise Scope (GM EX-3)
 - b. Exercise Objectives
 - c. Exercise Duration
 - d. Prompt Notification System (REP 10)
 - e. Public Education (Brochure/Survey) (REP 10)
 - f. Field Demonstrations (In/Out of Sequence, Required Resources)
- *10. Exercise Scenario Rad./Met./Protective Action Requirements
- *11. Government Interface (NUREG 0654 Supplement 1)
- * not for discussion with potential exercise participants

Handwritten notes:
- Island, letters to
- essentially 152 entities
- from BNL
- Working
- Capital at hand
- Budget
- Problem of what
- as a basis for real
- they will play

BRIEFING NOTES

FEMA APRIL 8, 1988 MEETING WITH LILCO

REGARDING CONDUCT OF THE SHOREHAM EXERCISE

C/3

EXERCISE APPROACH

- * As in first Shoreham exercise, NRC will provide support to FEMA in conducting certain aspects of the exercise because of the non-participation of State and local authorities.

Offsite Controller

Staging Areas

Field Monitoring Teams

LERO EOC

Emergency News Center

Other Offsite Emergency Response Facilities

Control Cell(s)

Telephone Communications

Liaison Interfaces

- * NRC will be more active in developing the exercise objectives, extent of play, evaluation plan, and control plan than in the previous exercise
 - ** Make a determination if LILCO offsite exercise objectives are adequate to be "qualifying exercise" under NRC rules.
 - ** Review extent of play parameters and provide comments to FEMA.
 - ** Participate in FEMA/LILCO meetings in the development of the evaluation plan and the extent of play.
 - ** Develop the offsite control plan and head up the offsite control activities.
- * NRC resources that may be required.
 - ** Based on initial discussions. Will be refined further as evaluation plan and control plan is developed.
 - ** Representatives from AEOD and NRR will be involved essentially full-time until the exercise.
 - ** 15 or more EXPERIENCED staffers from HQS and the regions will be required at the exercise as controllers.
 - ** Some preparation time for controllers (1-2 days) at their offices.
 - ** Controllers will spend 3-5 days at the Shoreham area.

* The manner in which the LERO interface with non-participants will be evaluated will use the following guidance:

- ** Intent of evaluation is to observe those aspects of the LERO plan for which procedures have been developed to interface with non-participating Suffolk County and New York State officials. No satisfactory method has been identified to evaluate a non-participating response.
- ** LERO EOC responders will call control cell when they need to communicate with Suffolk County or New York State officials to request legal authority, when procedures require, and/or when updates are appropriate.
- ** Controller will ask sufficient questions, as necessary, to fully understand what is being told and/or to give LERO the authority ^{or} requested.
- ** Controller will give LERO limited authority to carry out the particular request, NOT general authority. *resources*
- ** LERO Liaisons will go to a location and interface directly with controllers in a manner similar to above.
- ** Consider the possibility of having the ASLB review this approach for adequacy?

What ^{additional} resources would you request if you ran out of resources?

Tell LILCO that they can ask for resources!

ANTICIPATED PARTICIPATION BY OUTSIDE ORGANIZATIONS*

- * LILCO will send registered letters shortly to all outside organizations (152) requesting their participation in the exercise.
- * New York State - No participation.
- * Suffolk County - No participation.
- * Nassau County - No participation.
- * School Districts - Wading River expected to play. Others are not. LILCO is assuming these are non-participating government entities.
- * Connecticut - Staff is cooperative and willing to play. Seeking permission from Governor.
- * Special Facilities - Most are not cooperating. Expect at least one of each category.
- * Dept. of Energy - Brookhaven Lab will play fully.
- * US Coast Guard - Expect cooperation. Not sure what effect Coast Guard budget cuts will have.
- * American Red Cross - Not cooperative. Uncertain whether they will play.
- Other Federal Agencies - LILCO may send letter to NRC and FEMA requesting participation in the exercise play.

*Based on LILCO comments at April 8, 1988 meeting.

Reception Centers -

SHOREHAM MILESTONE DATES AFFECTING NRC

- April 15 FEMA and NRC Regional offices complete review of offsite exercise objectives.
- April 18 LILCO will submit exercise scenario to FEMA and NRC along with proposed extent of exercise play.
- April 21 FEMA will submit RAC approved offsite objectives to NRC for determination of "qualifying exercise under NRC rules."
- April 29 NRC to provide FEMA with response on "qualifying exercise."
- April 29 Next scheduled meeting of FEMA, LILCO and NRC for exercise planning.
- May 3 FEMA will provide NRC with their plan for extent of exercise play.
- May 10 NRC and FEMA will provide comments to FEMA RII regarding extent of play.
- May 15 Last revisions of LILCO plan that will be accepted by FEMA before the exercise.
- May 17 or 24? Expected last Shoreham drill before the exercise.
- June 14 Shoreham exercise.

OTHER ITEMS OF INTEREST AND CONCERN

- * Some of these activities are expected to be conducted at the Seabrook exercise.
 - * The Shoreham exercise will be 3 days:
 - Day 1 - Plume exposure activities
 - Day 2 - Ingestion pathway activities
 - Day 3 - Reentry/Recovery activities
 - * Reception centers are now planned to be on LILCO property. Because of legal issues, reception center trailers cannot be put at these reception centers. For exercise, will set up as much of activities as possible at the reception center area without trailers for evaluation and then evaluate the reception center trailer operations at other location.
 - * According to FEMA policy, FEMA RI will evaluate any State of Connecticut participation.
 - * All of the sirens will be rung, although it is doubtful that they will be evaluated during the exercise.
 - * In accordance with "realism", LILCO will expect New York State to distribute ingestion brochures, as necessary, after an emergency. This will be included in Rev. 10.
- The current RAC Chairman, Ihor Husar, has been promoted. A decision on the designation of a new RAC Chairman will be made by April 15.
- * LILCO was informed that there an obscure FEMA document which requires that both groups involved in a shift change have to make plume protective action recommendations. This is causing LILCO some concern.
 - * LILCO has offered to provide any Federal group with a briefing on the LERO organization and operations.