Federal Emergency Management Agency

Washington, D.C. 20472

JUL 12 1989

Mr. Frank J. Congel
Director
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Dear Mr. Congel:

The qualifying full-participation radiological emergency preparedness exercise at the Comanche Peak Steam Electric Station is scheduled for July 25-26, 1989. Enclosed are the exercise objectives submitted by the State of Texas on May 11, 1989, a June 9, 1989, letter from the State of Texas clarifying levels of participation, and two letters from the Federal Emergency Management Agency Region VI Office dated May 19, 1989, and June 16, 1989, which address the objectives and levels of participation. The objectives and levels of participation have been reviewed by FEMA Headquarters and FEMA Region VI and are being forwarded to the Nuclear Regulatory Commission for review and comment. Please note that it is our understanding that a total population exposure report will be prepared as part of Objective 31.

We believe that the proposed objectives identified in the enclosed material and as noted above are sufficient to constitute a qualifying exercise under 10 CFR 50. Please review the enclosed material and advise us as soon as possible of any comments you may have and if the objectives are sufficient to constitute a qualifying exercise under NRC regulations.

If you have any questions, please call me at 646-2871.

Sincerely,

Dennis H. Kwiatkowski
Assistant Associate Director
Office of Natural and Technological Hazards

Enclosure

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June 16, 1989

Mr. Robert Lansford
Texas Department of Public Safety
Division of Emergency Management
Box 4087, North Austin Station
Austin, Texas 78773

Dear Mr. Lansford:

The FEMA Region has reviewed, and with concurrence of FEMA Headquarters, herewith approves the levels of participation for the Comanche Peak REP exercise set forth in your letter of June 9, 1989.

The only question raised was the meaning of the term "task managers" as used in Item 1. We believe that this means Department heads or representatives operating in the EOC during emergency operations. If this understanding is correct, no further response is required. If not correct, please provide an explanation of this term.

If you intend to incorporate these levels of play in a new version of the exercise objectives (and explanatory notes), please provide us a final version of these documents for our records.

If you have any further questions, please contact Gary Jones of my staff at 817/898-9123.

Sincerely,

K

Alton S. Ray, P.E.
Chief, Natural and Technological
Hazards Division

cc: David Lacker
Charles Hackney

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May 19, 1989

Mr. Robert Lansford
State Coordinator
Division of Emergency Management
Post Office Box 4087
Austin, Texas 78773

Dear Mr. Lansford:

We have received and made a detailed review of the proposed objectives for the July 25-26, 1989 off-site exercise, at the Comanche Peak Steam Electric Station, submitted in your letter of May 11, 1989.

The objectives listed, modified by the notes included with the list, appear to meet the requirements of NUREG 0654/FEMA REP1, Rev. 1 and GMs EX-3 and IN-1 and should provide the basis for a successful exercise.

Therefore, the objectives for the 1989 Comanche Peak qualifying exercise are herewith approved.

We request that the scenario for this exercise be submitted for review as close to the May 31, 1989 due date as possible.

Should you have any further questions, please contact Gary Jones of my staff at 817/898-9123.

Sincerely,

Alton S. Ray, P.E.
Chief, Natural and Technological
Hazards Division

cc: David Lacker
Charles Hackney

R6:NTH:PEYTON:nc:5-19-89

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Gary VI

MAY 17 1989

DIVISION OF EMERGENCY MANAGEMENT

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JOE E. MILNER
Director

ROBERT A. LANSFORD
Coordinator

May 11, 1989

Mr. Edd Hargett, Director
Federal Emergency Management Agency
Region VI, Federal Center
800 North Loop 288
Denton, Texas 76201

Dear Mr. Hargett:

Enclosed are the State of Texas and Local Government objectives for the July 25-26, 1989, graded exercise for the Comanche Peak Steam Electric System (CPSES).

If you have any questions concerning this matter please contact Bob Gibson of my staff at (512) 465-2138.

Sincerely,

Robert A. Lansford
State Coordinator

RAL:Gd

Enclosure

cc: TDH - BRC
NRC - Washington, D.C.
Somervell County Judge
Hood County Judge
CPSES
RLO, Region 6

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STATE AND LOCAL OBJECTIVES FOR THE 1989 CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
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.	X	X	1,2,3,4,9
2. Demonstrate the ability to fully alert, mobilize and activate personnel for both facility and field based emergency functions. (See Note B)	X	X	ALL
3. Demonstrate the ability to direct, coordinate and control emergency activities.	X	X	1,2,3,4,9
4. Demonstrate the ability to communicate with all appropriate locations, organizations, and field personnel.	X	X	ALL

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
5. Demonstrate the adequacy of facilities, equipment, displays and other materials to support emergency operations.	X	X	1,2,3,4,9,15
6. Demonstrate the ability to continuously monitor and control emergency worker exposure.	X	X	1,2,5,6,7,8, 9,10,11,12,13, 14,15,16
7. Demonstrate the appropriate equipment and procedures for determining field radiation measurement. (See Note C)	X		7
8. Demonstrate the appropriate equipment and procedures for the measurement of airborne radioiodine concentrations as low as 10 E-7 microcuries per cc in the presence of noble gases.	X		7,16
9. Demonstrate the ability to obtain samples of particulate activity in the airborne plume and promptly perform laboratory analysis.	X		7,16
10. Demonstrate the ability, within the plume exposure pathway to project dosage to the public via plume exposure, based on plant and field data.	X		9

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
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.	X	X	1,2,9
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). (See Note D)		X	1,2
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. (See Note E)	X	X	1,2,9,15
14. Demonstrate the ability to brief the media in an accurate coordinated and timely manner.	X	X	1,2,3,4,15

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
15. Demonstrate the ability to establish and operate rumor control in a coordinated and timely fashion. (See Note U)	X	X	1,2,3,4,15
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 radioiodine releases.	X	X	1,2,7,9
17. Demonstrate the ability to make the decision, if the state plan so specifies, to recommend the use of KI for general public, based on predetermined criteria, as well as to distribute and administer it once the decision is made, if necessitated by radioiodine releases.	This objective will not be demonstrated as it conflicts with State policy.		

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
18. Demonstrate the ability and resources necessary to implement appropriate protective actions for the impacted permanent and transient plume EPZ population (including transit-dependent persons, special needs populations, handicapped persons and institutionalized persons). (See Note F)		X	1,2
19. Demonstrate the ability and resources necessary to implement appropriate protective actions for school children within the plume EPZ. (See Note G)		X	1,2
20. Demonstrate the organizational ability and resources necessary to control evacuation traffic flow and to control access to evacuated and sheltered areas. (See Note H)	X	X	1,2,7
21. Demonstrate the adequacy of procedures, facilities, equipment and personnel for the registration, radiological monitoring and decontamination of evacuees. (See Note I)	X	X	5,6

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
22. Demonstrate the adequacy of facilities, equipment and personnel for congregate care of evacuees. (See Note J)		X	5,6
23. Demonstrate the adequacy of vehicles, equipment, procedures and personnel for transporting contaminated, injured or exposed individuals. (See Note K)		X	12,13,14
24. Demonstrate the adequacy of medical facilities, equipment, procedures and personnel for handling contaminated, injured or exposed individuals.		X	8,10,11
25. Demonstrate the adequacy of facilities, equipment, supplies, procedures and personnel for decontamination of emergency workers, equipment and vehicles and for waste disposal. (See Note L)	X	X	5,6
26. Demonstrate the ability to identify the need for and call upon federal and other outside support agencies' assistance.	X	X	1,2,3,4

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
27. Demonstrate the appropriate use of equipment and procedures for collection and transport of samples of vegetation, food crops, milk, meat, poultry, water and animal feeds (indigenous to the area and stored). (See Note M)	X		7
28. Demonstrate the appropriate lab operations and procedures for measuring and analyzing samples of vegetation, food crops, milk, meat, poultry, water and animal feeds (indigenous to the area and stored). (See Note N)	X		16
29. Demonstrate the ability to project dosage to the public for ingestion pathway exposure and determine appropriate protective measures bases on field data, EPA PAG's and other relevant factors.	X		9
30. Demonstrate the ability to implement both preventative and emergency protective actions for ingestion pathway hazards. (See Note O)	X		3,9

STATE AND LOCAL OBJECTIVES FOR THE 1989
CPSES EMERGENCY RESPONSE EXERCISE

OBJECTIVE NUMBER AND TEXT	JURISDICTIONAL RESPONSIBILITY State	Local	LOCATION (See Note A)
31. Demonstrate the ability to estimate total population exposures. (See Note P)	X		9
32. Demonstrate the ability to determine appropriate measures for controlled reentry and recovery based on estimated total population exposure, available EPA PAG's and other relevant factors. (See Note Q)	X		9
33. Demonstrate the ability to implement appropriate measures for controlled reentry and recovery. (See Note R)	—	X	1,2,3,4,9
34. Demonstrate the ability to maintain staffing on a continuous 24-hour basis by an actual shift change. (See Note S)	X	X	1,2,3,4,5, 6,7,9,15,16
35. Demonstrate the ability to coordinate the evacuation of onsite personnel. (See Note T)		X	1,2

Notes:

A. The locations where various exercise objectives are to be demonstrated are indicated by numerical codes as follow:

CODE	TEAM ELEMENT OR FACILITY NAME	LOCATION
1.	Somervell Co. EOC	Glen Rose
2	Hood Co. EOC	Granbury
3.	Texas State EOC	Austin
4.	Disaster District EOC	Waco
5.	Relocation/Care Center	Stephenville
6.	Relocation/Care Center	Cleburne
7.	State Field Teams	10 Mile EPZ (also Hood County Courthouse Annex)
8.	Walls Regional Hospital	Cleburne
9.	BRC O/S	CPSES EOF
10.	Harris Hospital	Stephenville
11.	Hood General Hospital	Granbury
12.	Glen Rose VFD EMS Ambulance	Glen Rose
13.	Stephenville FD EMS Ambulance	Stephenville
14.	Hood General Hosp. EMS Ambulance	Granbury
15.	Media Center	CPSES Vstr Cntr
16.	Texas BRC Mobile Lab	Granbury

B. Mobilization and activation of personnel will be performed in accordance with approved plans and procedures with the exception of state personnel. Due to scenario time constraints, these personnel will be prepositioned in the local area (Glen Rose or Granbury).

C. Two Teams will Play per shift. One member of each State Field Monitoring Team on the second shift will demonstrate dressing in protective clothing, however this clothing will not be worn in the field. Note: Respirators will not be required.

D. All preparations of the Alert and Notification system will be demonstrated except for the actual sounding of the sirens. Delivery of EBS messages to the EBS station will be simulated by placing a phone call, as described by applicable plans and procedure, to the EBS station. The EBS station will receive the message, log it, process the message and simulate broadcast of the message. Sometime on day one, the station will transmit the EBS network test message.

E. Delivery of follow-up messages to the EBS station will be simulated.

F. During the exercise, any Special Needs Facilities within affected areas will be contacted (either actual contact for participating facilities or control cell contact for others) for information relating to transportation needs. If contact is not made, default values will be used. Simulated calls will be placed to individuals listed in the special assistance file as required by the scenario. For affected areas, the EOC will identify resources needed, place simulated phone calls to obtain them locally and request assistance, if needed. Any EOC without an affected area will demonstrate this objective by describing the process and providing a list of resources, phone numbers, etc. As required by scenario, the following resources will be dispatched (as a maximum): Five buses, two vans and one ambulance (may be simulated). They will drive to the appropriate locations, pause (to simulate loading time) and proceed to the appropriate locations. For those vehicles arriving at the reception centers, drivers will simulate evacuees and be processed accordingly.

G. Since schools will not be in session, school activities will be simulated according to a mini-scenario, distinct from the main scenario. All three school districts will be contacted, and district administrators will be prepared to describe the school evacuation process, including determining the availability of buses and drivers. Two districts will play further, at one pre-designated school in each district. Because the closed schools will not be air-conditioned, the

school administrator and one teacher for each school will be prepositioned at district administrative offices until informed by controller message to proceed to the school. They will simulate school evacuation by providing information about evacuation procedures and by instructing two simulators (simulating students) to evacuate. One school bus will be dispatched to each school, will board the simulated students, and will proceed to the relocation center.

H. Each County EOC will demonstrate that it can determine the necessary number and location of Access Control Points (ACPs) and Traffic Control Points (TCPs) and, how it will man these points and actually set them up in the field. Assistance from other sources will be simulated except for pre-designated State players and equipment. ACPs and TCPs will be set up at the side of the road; normal traffic flow will not be impeded. Due to the need to minimize time away from normal duty stations, only two ACPs and one TCP will be actually established. Any other ACP's or TCP's required by the scenario will be simulated.

I. At least eight individuals and one simulated contaminated person and vehicle will be processed at each center. Decontamination will be simulated. The school relocation portion of the Stephenville Relocation/Care Center Plan will not be activated as school is not in session.

J. To minimize disruption of private organizations that normally provide congregate care, they will be contacted on the day of the exercise, but need not participate.

K. Three ambulances will be used to actually transport simulated contaminated injury victims.

L. Decontamination of emergency workers will include monitoring and display of supplies, equipment and showers. Decontamination of equipment and vehicles (after appropriate demonstrations of monitoring) will be demonstrated by describing the decontamination techniques which would be used.

M. Three field teams will demonstrate the collection and transport of samples. Samples will include soil, standing water, vegetation (two types including grass) and milk but will exclude poultry,meat and stored animal feed. All samples will be delivered to the State Mobile Lab. Radiological controls will be limited to gloves and shoe covers; any other may be simulated. Radio contact is not required. Only the State of Texas will demonstrate the ingestion portion. Local entities are not required to participate. No shift change will be required. This will be performed on the 2/nd day of the exercise.

N. All lab procedures will be demonstrated on at least one of each type of the actual samples delivered to the lab except for the actual counting of the samples.

O. Discussions between the BRC O/S CPSES EOF and the State Council members will simulate implementation of protective actions. EBS messages will be generated and coordinated, but will not be transmitted to the radio station. Press releases will be generated and coordinated. The New Center will not be activated on the 2/nd day of the exercise. Federal agency participation will be assumed not to have arrived.

P. By agreement with FEMA Region VI, players will demonstrate this objective following the Plume Pathway exercise on day one. Individuals who would make the calculations to satisfy this objective will walk FEMA through the process used, indicate where the data used for calculations is obtained, and will describe the decision making process involved in developing estimated total population exposures. A report will not be issued.

Q. This objective will be demonstrated by the formulation of action plans following the Plume Pathway exercise on day one. Controllers will provide simulated data to the participating individuals. Consideration for the relocation and/or reentry of general and/or special populations will be determined and driven by an evaluation of deposition activity in relation to applicable PAGs.

R. The ability to implement appropriate measures for controlled reentry and recovery will be demonstrated by consideration of recovery recommendations/planning by local state and utility representatives at the CPSES EOF and if required the Somervell County EOC. Players will initiate calls (as needed to implement reentry/recovery measures) to a control cell which will simulate those agencies/organizations which would provide resources and information.

S. An actual shift change will be required during the exercise on day one, for shift personnel at all locations except State EOC, Disaster District EOC Waco (this does not include BRC personnel), hospitals, ambulances and EMS support organization personnel.

T. Notification of local governments, proper use of communication channels, coordination and provision of appropriate off-site support to an on-site evacuation will be evaluated at the local EOCs. Controller messages to site personnel will specify the number of simulated evacuees and evacuated vehicles. The EOC will evaluate the impact and, if required by scenario, will simulate activities which would be required to control plant evacuation traffic.

U. Rumor control at locations 1-4 will only be exercised as it relates to the overall coordination process with the Joint Information Center (JIC). This activity will not be demonstrated as a seperate or primary function since the JIC at the facility has primary responsibility for this function.

DIVISION OF EMERGENCY MANAGEMENT

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JOE E. MILNER
Director

ROBERT A. LANSFORD
Coordinator

June 9, 1989

Mr. Edd Hargett, Regional Director
Federal Emergency Management Agency
Federal Regional Center
800 North Loop 288
Denton, TX 76201

Dear Mr. Hargett:

Recent discussions among members of your staff, my staff, and representatives of TU Electric and the local governments in the Comanche Peak area have raised questions regarding the level of participation of local government forces in the upcoming graded exercise for CPSES. These questions revolve primarily around how many local personnel can be committed to exercise participation without degrading the ability of the communities to maintain acceptable levels of public safety and public administration. A secondary question involves the level to which volunteers, such as firemen, can be asked to disrupt their normal work schedules in order to participate in such activities as radiological monitoring and ambulance operations for exercise purposes.

It is my understanding that state, local, and federal representatives have tentatively agreed upon levels of participation which will satisfactorily demonstrate the exercise objectives without undue impact on public safety. I request your agency's review of the following levels of participation, and FEMA's written concurrence (or exception) as quickly as possible, in order that we may adjust our offsite training requirements and address local government concerns expeditiously.

Item 1: level 1 of participation in local facilities being evaluated.

Decision-makers and task managers will demonstrate a shift change. Clerical, secretarial, and non-specialized support personnel will not be required to demonstrate a shift change.

Item 2: level of participation by regular emergency services personnel (e.g. police, fire, and ambulance personnel).

Emergency service departments called upon by the scenario to demonstrate a function may respond with only representative numbers of personnel, as opposed to complete teams. Specifically, the City of Stephenville may send four firemen to represent an eight-man team for one shift, and a second four-man team to represent the second eight-man shift assigned to radiological operations at the

Stephenville Relocation Center. Other localities may enact similar representations if full-team response would jeopardize the public safety on the day of the exercise.

Item 3: level of participation by volunteers.

Volunteers who are chiefs of services, such as fire chiefs, will demonstrate a shift change.

Teams of volunteers assigned to response functions, such as radiological monitoring at local EOC's, may be demonstrated by two one-man shifts representing two two-man shifts.

Private-agency volunteers, such as the American Red Cross representatives in the Relocation Centers, will not be required to demonstrate a shift change.

Item 4: level of participation by schools.

In a scenario independent of the main exercise, school district personnel in Glen Rose ISD and Granbury ISD will demonstrate the notification, activation, and mobilization procedures necessary to evacuate one school facility in each district, using one bus at each location. Busses will be driven to the appropriate Relocation Centers. No shift change will be demonstrated.

Approval of these levels of participation should enable the localities to maintain regular service levels while demonstrating their emergency response capabilities and procedures. Please advise me at your earliest opportunity as to whether you concur with this assessment.

Sincerely,

Robert A. Lansford
State Coordinator

RAL:LJS:ccp