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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. Since the milestone time frames have been changed, they should be implemented beginning calendar year 1989. Until then, the milestone dates in parentheses should be used. Beginning in 1989, if exercises are conducted more frequently than biennially, the milestone time frames placed in parentheses should be used.

NUCLEAR REGULATORY COMMISSION

60-4430L
 60-444-01
 In the matter of Public Serv. Co. of New Hampshire
 Staff _____ IDENTIFIED 2/16/60
 Applicant _____ RECEIVED 2/16/65
 Inspector ✓ REJECTED _____
 Cont's Offr _____
 Contractor Heritage DATE 5-17-89
 Other _____ Witness _____
 Reporter Dana Cook

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+

Public Meeting is held by the RAC chairperson and the State(s). (Qualifying Exercise)

ED+

Participants Meeting is conducted by RAC Chair. (Continuing Approval Exercises)

ED+30

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

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 36 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 N.1.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).

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)(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)(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 36 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. For all 36 objectives, the need for organizations to demonstrate these capabilities is dependent upon their assigned plan responsibilities.

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.

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.

Group C objectives, numbers 26-36, 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 (27-30) 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 34) 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

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 34 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.a.

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 radioiodine 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. (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. (10) 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.

- | | |
|--|-------------------|
| 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 radioiodine 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 radioiodine 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 permanent and transient plume EPZ 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 EPZ. (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 medical 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

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|---|--------------------------|
| 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). (9) | I.8.,
J.11. |
| 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). (9) | C.3.,
J.11. |
| 29. Demonstrate the ability to project dosage to the public for ingestion pathway exposure and determine appropriate protective measures based on field data, FDA PAG's and other relevant factors. (11) | I.10.,
J.9.,
J.11. |
| 30. Demonstrate the ability to implement both preventive and emergency protective actions for ingestion pathway hazards. (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 appropriate measures for controlled reentry and recovery based on estimated total population exposure, available EPA PAG's and other relevant factors. (35) | M.1. |
| 33. Demonstrate the ability to implement appropriate measures for controlled reentry and recovery. (35) | M.1. |

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

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|---|-----------------|
| 34. Demonstrate the ability to maintain staffing on a continuous 24-hour basis by an actual shift change. (2) | A.1.e.,
A.4. |
|---|-----------------|

EVACUATION OF ONSITE PERSONNEL

- | | |
|--|--------------|
| 35. Demonstrate the ability to coordinate the evacuation of onsite personnel. (23) | B.6.
J.2. |
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UNANNOUNCED AND OFF-HOURS

36. 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. (New Objective) N.1.b.

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 by NRC staff.