



FEMA

September 16, 2021

Russell J. Strickland
Executive Director
Maryland Emergency Management Agency
5401 Rue Saint Lo Drive
Reisterstown, MD 21136

Dear Mr. Strickland:

The purpose of this letter is to notify you of the Federal Emergency Management Agency's (FEMA) identification of a Level 1 Finding that occurred during the Calvert Cliffs Nuclear Power Plant (CCNPP) Radiological Emergency Preparedness (REP) Exercise conducted on September 14, 2021. A Level 1 Finding is being assessed against the Maryland Emergency Management Agency under Assessment Area 5, Criterion 5.a.1 (Activation of the Prompt Alert and Notification System) as described below:

Staff at the Maryland State Emergency Operations Center/Maryland Joint Operations Center (SEOC/MJOC) did not follow procedures for the transmission of an EAS message; and therefore transmitted incorrect information from the EMnet Emergency Alert System (EAS) following the declaration of a General Emergency by Calvert Cliffs Nuclear Power Plant. The EAS message, as transmitted, omitted the specific protective action decision direction to members the public residing in Zones 1, 2, and 3 to evacuate; Zones 6 and 7 to shelter in place; and for the public in Zones 1, 2, 3, 6 and 7 to ingest Potassium Iodide (KI).

In addition to not communicating the protective action decision, the EAS message contained incorrect direction to evacuate Zones A and B, to also shelter in place in Zone A (Zones A and B are not public evacuation zones, but U.S. Coast Guard maritime zone designations applied to the Patuxent River) and instructed emergency workers to ingest KI.

Had this message been transmitted in an actual incident, significant portions of the public would not have received the direction to evacuate and ingest KI, critical protective actions adopted by the State of Maryland in response to a nuclear power plant incident with a radiological release in progress.

In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with the pertinent organizations participating in the off-site exercise



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evaluation. The FEMA REP Program Manual, defines a Level 1 Finding as “... an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.”

Recommended courses of action to correct the deficiency include:

1. Review/revise MJOC checklist to specify the communications pathway by which the JIC sends the approved EAS message to the MJOC for dissemination.
2. Review/revise MJOC checklist to specify that the MJOC Supervisor must visually verify the message text in the EMnet against the approved PAD Form prior to the EMnet operator transmitting the message.
3. Include MJOC EAS transmission procedures and checklist in the Fixed Nuclear Facility Plan and Consequence Management Operations Plan in order that SEOC leadership will be more aware of the MJOC procedures and responsibilities.

Any procedural changes will require review from the Region 3 REP staff prior to a remedial exercise.

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

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FEMA Region 3 is committed to supporting the completion of an exercise as soon as practicable, preferably within 75 days. Please coordinate with members of the FEMA Region 3 REP staff to determine the date and time of the remedial exercise within 10 days from receipt of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Thomas Scardino at (202) 374-2449.

Sincerely,

MaryAnn Tierney
Regional Administrator