



FEMA

June 21, 2024

Catherine Nolan
Chief
Policy and Oversight Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U. S. Nuclear Regulatory Commission

Re: Notification of Level 1 Finding (Corrected), 2024 Cooper Nuclear Station Medical Services Drill

Dear Ms. Nolan:

The purpose of this letter is to officially inform the Nuclear Regulatory Commission (NRC) of the Federal Emergency Management Agency's (FEMA) identification of a Level 1 Finding that occurred during the Medical Services Drill conducted on May 9, 2024. This drill was conducted Out of Sequence in support of the 2024 Cooper Nuclear Station Biennial Plume Phase/Hostile Action Based Exercise conducted on May 21, 2024. A Level 1 Finding is being assessed against Community Hospital-Fairfax, located in Fairfax, MO, and the Nodaway County Ambulance Service, located in Maryville, MO. Note that this finding has already been corrected by the responsible agency and is considered closed.

Appropriate Federal agency members of the Region 7 Regional Assistance Committee (RAC) were consulted regarding the observations and agreed this should be classified as a Level 1 Finding. The issues resulting in the Level 1 Finding were observed as summarized below.

Capability Target 5.3: Transportation and Treatment of Contaminated, Injured Individuals

Condition: The Ludlum Model 26 monitoring instruments provided in the Community Hospital-Fairfax and Nodaway County Ambulance Service equipment kits did not have range of reading stickers affixed to document the acceptable range of readings when conducting a response check with the instruments. In addition, the accompanying certification of calibration documents in each kit did not match the instruments provided.

Possible Cause: The Missouri State Emergency Management Agency (SEMA) did not ensure proper calibration of the instruments, including accurate documentation, and did not ensure range of reading stickers were affixed to the instruments.

Effect: The hospital staff and ambulance crew did not have a calibrated instrument to detect the presence of possible radiological contamination and were unable to operationally check the

instrument against the provided test source. Without a calibrated instrument they could not adequately detect possible contamination on a patient, themselves, or their equipment. This could jeopardize the safety of the patient and the emergency workers.

Per applicable plans and procedures, SEMA is responsible for calibration of the instruments and therefore is responsible to correct the finding for both drill participants. For purposes of notification and coordination with the NRC, SEMA, Cooper Nuclear Station, and other stakeholders, FEMA Region 7 recommends treating this as a single Level 1 Finding for SEMA. Due to the structure of the exercise documentation within the Preparedness Toolkit (PTK), it will be reflected as a Level 1 Finding for both participants.

Following the drill, SEMA took immediate actions to begin correcting the observed issues. On June 17, 2024, SEMA presented the monitoring instruments for both locations to FEMA Region 7. We verified that all the instruments had been calibrated, with appropriate documentation, and that range of reading stickers had been affixed to each. FEMA Region 7 recommended that the Level 1 Finding be considered corrected, closed, and reflected as such in the forthcoming After Action Report for the Cooper Nuclear Station biennial exercise. FEMA HQ has concurred.

In accordance with 44 CFR 350.9(d) and the DHS/FEMA Radiological Emergency Preparedness (REP) Program Manual, we have thoroughly reviewed and discussed this issue with the pertinent organizations participating in the offsite exercise evaluation. The FEMA REP Program Manual, defines a Level 1 Finding as "...an observed or identified inadequacy of organizational performance in an assessment activity 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."

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 after-action report (AAR) for the biennial exercise. In this specific case, the finding has corrected and the AAR will reflect the correction.

Please contact me at (202) 657-2301, if you have any questions or require any further assistance on this matter.

Sincerely,

Thomas Warnock, Chief
Radiological Emergency Preparedness Branch

CC: Jay Van Der Werff, Ph.D., FEMA Region 7 RAC Chair
Thomas Morgan, FEMA Region 7 Technological Hazards Branch Chief