




**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2056 WESTINGS AVENUE, SUITE 400
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September 22, 2025

MEMORANDUM TO: Eva Brown, Chief
Coordination Branch, NSIR
Division of Preparedness and Response

FROM: Michael Jones Jr.,  Signed by Jones, Michael
on 09/22/25
Sr. Emergency Response Coordinator, Region III
Security, Emergency Preparedness and Incident Response

SUBJECT: DONALD C. COOK EMERGENCY RESPONSE EXERCISE
AFTER-ACTION REPORT

On June 24, NRC responders from NRC Headquarters and Region III participated with Indiana Michigan Power Co. (Donald C. Cook). All NRC exercise objectives were met.

Following the exercise, the NRC response organization conducted a performance review to identify strengths and weaknesses and to document possible areas for improvement. The enclosed After-Action Report (AAR) is submitted for your review.

If you have any questions, please contact Michael Jones Jr. at michael.jones@nrc.gov.

Enclosures:

1. Donald C. Cook Nuclear Plant Emergency Response Exercise After-Action Report
2. Donald C. Cook Emergency Exercise Plan

Memorandum to E. Brown from M. Jones dated September 22, 2025.

SUBJECT: DONALD C. COOK EMERGENCY RESPONSE EXERCISE
AFTER-ACTION REPORT

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| OFFICE | RIII/DRSS | RIII-DRSS | | | | |
| NAME | DSargis:dc | MJones | | | | |
| DATE | 09/16/2025 | 09/22/2025 | | | | |

OFFICIAL RECORD COPY

Donald C. Cook Exercise

After-Action Report

June 24, 2025

Enclosure

EXERCISE OVERVIEW

Exercise Name Donald C. Cook 2025

Exercise Dates June 24, 2025

Exercise Objectives

1. **Enhance Senior Leadership Engagement in Emergency Response**
 - a. Provide a realistic and meaningful emergency response experience for NRC senior leaders, tailored to their respective roles.
 - b. Ensure Commissioner engagement and support are consistent with expectations for a real-world event.
2. **Demonstrate Effective Internal Communications and Documentation**
 - a. **Verbal Communications:** Evaluate the quality, timeliness, and effectiveness of verbal communications between NRC personnel
 - b. **Written Communications & Documentation:** Demonstrate accuracy and completeness in response documentation, including:
 - i. Position logs
 - ii. Event summary/timeline
 - iii. Response Status Reports (RSRs)
 - iv. Action Plans (APs)
3. **Demonstrate Effective External Coordination**
 - a. Assess the NRC's coordination with external stakeholders, including:
 - i. Licensee Coordination
 - ii. State Engagement
 - iii. Federal Interagency Coordination (Simulated)
4. **Support Responder Qualification and Familiarity**
5. **Demonstrate Timely Staffing of the Emergency Response Organization (ERO)**
 - a. Validate the effectiveness of the NRC's **Automated Notification System** in alerting pre-established exercise roster ERO participants of the simulated event, and timely staffing of the NRC response centers.

Scenario

The scenario initiated with the failure of Unit 1 Auxiliary Building Exhaust Fan. Shortly after, the Shift Manager was notified of a credible land-based security threat. Both units initiated imminent threat procedures.

A hostile action occurs within the Protected Area, causing operators to trip both reactors and involving the use of explosives to destroy plant equipment. This results in the ejection of several fuel assemblies, a large break Loss of Coolant Accident (LOCA), and radiological release. The Shift Manager was required to order all essential personnel to take cover during this exercise.

Participating Organizations

- Licensee
- State of Michigan
- Berrien County
- Berrien County Sheriff's Department
- Local Law Enforcement, FBI, and local services through the Incident Command Post
- NRC (refer to Appendix C for NRC watch bill)
 - Headquarters Responders and Operations Officers
 - Region III Responders at:
 - Incident Response Center
 - Michigan State Emergency Operations Center (SEOC)
 - Incident Command Post
 - Licensee Simulator Control Room, Emergency Operations Facility and Alternative Facility

Point of Contact

Michael Jones, Sr. ERC, Region III, Michael.Jones@nrc.gov

Jeffery Grant, Team Lead, HQ, Jeffery.Grant@nrc.gov

STRENGTHS

A strength is defined as an exceptional level of performance demonstrated that, if implemented across the agency, it would result in a significant improvement in response capability or efficiency or would significantly reduce resource requirements.

None.

AREAS FOR IMPROVEMENT

The following section provides an overview of Areas for Improvement (AFI) related to the exercise objectives.

AFI #1: Agencywide Notification Process and Authorized Senders

Exercise controllers have noted in several recent exercises, including DC Cook, that our ability to issue notification to all NRC staff of “exercise/event in progress” remains constrained. Response procedure IRP 250, Planning Section, requires notification to all NRC staff, during events/exercises; with approval required by the Planning Section Chief. Controllers note that the total number of people trained and authorized to send this email creates a high probability that this action will be significantly delayed or even go unperformed.

This issue was entered into the Agency’s corrective action program and assigned medium significance. Per program criteria, medium-significance findings are those with the potential to have significant incident response program impact and requires corrective actions to be implemented within six months.

AFI #2: Document Marking

Exercise controllers identified deficiencies in control, marking, and dissemination of potentially sensitive and security related information shared with both internal and external stakeholders. In one instance, during development of communications for the Liaison Group, documents were found to lack appropriate security markings. This issue appeared to stem from insufficient training and procedural guidance for the team that would ensure proper markings of notifications and e-mail correspondence.

Emergency response personnel acknowledged the issue and affirmed that the responsibility for proper information handling lies within each response team. Additionally, there is a recognized need to enhance communication, training, and procedural clarity, particularly within the Documentation Unit of the Planning Section, which holds primary responsibility for ensuring the appropriate marking, control, storage, and destruction of information.

This issue was entered into the agency corrective action program and assigned medium significance. Per program criteria, medium-significance findings are those with the potential to have significant incident response program impact and require corrective actions to be implemented within six months.

AFI #3: Dose Assessment Communications and RASCAL Training and Use

Exercise participants noted two issues relating to Protective Measures Group (PMG) response activities. Specifically, how responders are trained to perform dose assessments and how they carry out external interagency communication responsibilities.

For dose assessment communications, responders saw notable challenge with effectively communicating dose assessments to the simulated National Atmospheric Release Advisory Center (NARAC). These challenges necessitate additional training and exercise to increase awareness of interagency flow of dose assessment information. This experience also reinforces the need and expectation to work with interagency partners, like DOE/NNSA, to clarify interagency expectations for NRC PMG and external dose assessment partners. This issue presents an opportunity to develop interagency templates for dose assessment communications to enhance clarity and efficiency.

For NRC assessment using Radiological Assessment System for Consequence Analysis for radiological emergencies (RASCAL), responders and exercise planners note that reestablishing frequent and enhanced training would be helpful to understand how the software could be used in non-conventional scenarios. Due to the limited number of qualified and proficient trainers this training has not been conducted since 2020, for agency PMG staff or external state users of the platform.

These two issues were entered into the agency corrective action program and assigned medium significance. Per program criteria, medium-significance findings are those with the potential to have significant incident response program impact and require corrective actions to be implemented within six months.

Attachment A: Assessed NRC Capabilities

Exercise Objective 1: Enhance Senior Leadership Engagement in Emergency Response

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|--------------------------|---|---|---------------------|
| Response Director | <ul style="list-style-type: none"> • Provide a realistic and meaningful emergency response experience for NRC senior leaders, tailored to their respective roles. • Ensure Commissioner Marzano's engagement and support are consistent with expectations for a real-world event, considering the scope and severity of the presented scenario. • Communicate NRC response activities (i.e., Oversight, Assessment, Liaison) to NRC Senior Leadership. • Maintain situational awareness and be able to communicate the status of the response to NRC Senior Leadership, when appropriate. | <ul style="list-style-type: none"> • Coordinate with Senior Agency Leadership. Specifically, establish briefing schedules, brief them on the ongoing response, and update them, as needed, outside of the briefing schedule. (IRP 140 B.1.c) • Maintain situational awareness (details in each team procedure). (IRP 140 B.13.h) <p> <input checked="" type="checkbox"/> Observed task completion with no issues <input type="checkbox"/> Observed some/minor issues (explain in comments) <input type="checkbox"/> Observed major issues (explain in comments) <input type="checkbox"/> Did not complete (explain in comments) </p> <p>Comments: None</p> | <u>MJ / JG / MK</u> |

Exercise Objective 1: Enhance Senior Leadership Engagement in Emergency Response

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|---------------------------|--|---|--------------------|
| Public Information | <ul style="list-style-type: none">Maintain situational awareness and be able to communicate the status of the response to NRC Senior Leadership, when appropriate. | <ul style="list-style-type: none">Coordinate with the Chairman and RD for press releases, posting to social media, and updating the NRC's public website. (IRP 140 B.3.d) <p>Additional Guidance:</p> <ul style="list-style-type: none">Coordinate with RD as needed to issue press releases, social media posts, talking points, etc.Coordinate with the rest of the response organization to receive information for generating products for informing the public and for responding to inquiries from the public.- PIO should ensure that timely and accurate information is received via verbal communications and WebEOC. Communication should be adequate to issue press releases and respond to inquiries. <p><input checked="" type="checkbox"/> Observed task completion with no issues <input type="checkbox"/> Observed some/minor issues (explain in comments) <input type="checkbox"/> Observed major issues (explain in comments) <input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: None</p> | <u>MJ</u> |

Exercise Objective 2: Demonstrate Effective Internal Communications and Documentation

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|-----------------------|--|--|--------------------|
| All Responders | <p>a. Verbal Communications: Evaluate the quality, timeliness, and effectiveness of verbal communications between NRC personnel assigned to:</p> <ul style="list-style-type: none"> i. DC Cook Control Room ii. Region III Incident Response Center (IRC) iii. NRC Headquarters Operations Center iv. Licensee's Incident Command Post v. State Emergency Operations Center (EOC) | <ul style="list-style-type: none"> Communicate effectively (verbally). (IRP 140 B.13.c) <p>Additional Guidance:</p> <ul style="list-style-type: none"> Ensure chains of communication are being utilized effectively to adequately support response organization. <p> <input type="checkbox"/> Observed task completion with no issues <input checked="" type="checkbox"/> Observed some/minor issues (explain in comments) <input type="checkbox"/> Observed major issues (explain in comments) <input type="checkbox"/> Did not complete (explain in comments) </p> <p>Comments: Training needed for cross team communications. Reduce siloing of information</p> | |

Exercise Objective 2: Demonstrate Effective Internal Communications and Documentation

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|-----------------------|---|--|--------------------|
| All Responders | <p>b. Written Communications & Documentation: Demonstrate accuracy and completeness in response documentation, including:</p> <ul style="list-style-type: none"> i. Position logs ii. Event summary/timeline iii. Action Plans (APs) iv. Response Status Reports (RSRs) | <ul style="list-style-type: none"> • Communicate effectively via WebEOC. (IRP 140 B.13.d) • Support the priorities and goals in the NRC Action Plan. (IRP 140 B.13.a) • Provide input for the RSR. (IRP 140 B.13.b) <p><input type="checkbox"/> Observed task completion with no issues</p> <p><input checked="" type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: Generally done well, but need to ensure important MS Teams chat entries make it into WebEOC</p> | |

Exercise Objective 3: Demonstrate Effective External Coordination

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|---------------------------|---|---|--------------------|
| Public Information | <p>a. Assess the NRC's coordination with external stakeholders, including:</p> <p>i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:</p> <ol style="list-style-type: none">1. External Security Bridge2. Emergency Notification System (ENS) Bridge3. Health Physics Network (HPN) Bridge <p>ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.</p> <p>iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.</p> | <ul style="list-style-type: none">• Communicate consistently with the NRC Crisis Communication Plan. (IRP 140 B.3.a) <p><input checked="" type="checkbox"/> Observed task completion with no issues</p> <p><input type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: Notifications were done timely</p> | <u>MJ</u> |

Exercise Objective 3: Demonstrate Effective External Coordination

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|--|---|--|--------------------|
| Operations Section Chief and Reactor Safety Group | <p>a. Assess the NRC's coordination with external stakeholders, including:</p> <p>i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:</p> <ol style="list-style-type: none">1. External Security Bridge2. Emergency Notification System (ENS) Bridge3. Health Physics Network (HPN) Bridge <p>ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.</p> <p>iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.</p> | <p>OSC</p> <ul style="list-style-type: none">• Coordinate Operations activities. (IRP 140 B.5.a) <p>RSG</p> <ul style="list-style-type: none">• Verify licensee is accurately identifying and declaring events. (IRP 140 B.6.a)• Coordinate with external sources for in-depth assessment. (IRP 140 B.6.f) <p><input checked="" type="checkbox"/> Observed task completion with no issues</p> <p><input type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: None</p> | <u>DS / KA</u> |

Exercise Objective 3: Demonstrate Effective External Coordination

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|----------------------------------|---|---|--------------------|
| Protective Measures Group | <p>a. Assess the NRC's coordination with external stakeholders, including:</p> <p>i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:</p> <ol style="list-style-type: none"> 1. External Security Bridge 2. Emergency Notification System (ENS) Bridge 3. Health Physics Network (HPN) Bridge <p>ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.</p> <p>iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.</p> | <ul style="list-style-type: none"> • Verify that the licensee is appropriately considering dose for site evacuations and plant operations. (IRP 140 B.7.b) • Coordinate with the Liaison Team to determine state and other Federal needs, with respect to dose assessment. (IRP 140 B.7.f) <p><input checked="" type="checkbox"/> Observed task completion with no issues</p> <p><input type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: None</p> | <u>MTN</u> |

Exercise Objective 3: Demonstrate Effective External Coordination

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|-----------------------|---|---|--------------------|
| Security Group | <p>a. Assess the NRC's coordination with external stakeholders, including:</p> <p>i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:</p> <ol style="list-style-type: none">1. External Security Bridge2. Emergency Notification System (ENS) Bridge3. Health Physics Network (HPN) Bridge <p>ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.</p> <p>iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.</p> | <ul style="list-style-type: none">• For Hostile-Action Based events, verify the licensee is accurately identifying and declaring events. (IRP 140 B.8.b) <p><input type="checkbox"/> Observed task completion with no issues</p> <p><input checked="" type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: Region III IAT was briefed. ENS bridge staffing during a HAB staffing should be considered. If site staffs ENS bridge early following accelerated notification, HOO staff can be responsive, but RD, PSC, and ERCs should consider staffing with RSG/SECURITY until Sec Bridge can be staffed.</p> | <u>BB / NSR</u> |

Exercise Objective 3: Demonstrate Effective External Coordination

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|---------------------|---|--|--------------------|
| Liaison Team | <p>a. Assess the NRC's coordination with external stakeholders, including:</p> <p>i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:</p> <ol style="list-style-type: none">1. External Security Bridge2. Emergency Notification System (ENS) Bridge3. Health Physics Network (HPN) Bridge <p>ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.</p> <p>iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.</p> | <ul style="list-style-type: none">• Assist and support state/local governments. (IRP 140 B.4.b)• Communicate and coordinate with regional Federal agencies. (IRP 140 B.4.c)• Communicate/ coordinate with Federal agencies. (IRP 140 B.4.f)• Assist and support congressional contacts. (IRP 140 B.4.I) <p><input type="checkbox"/> Observed task completion with no issues</p> <p><input checked="" type="checkbox"/> Observed some/minor issues (explain in comments)</p> <p><input type="checkbox"/> Observed major issues (explain in comments)</p> <p><input type="checkbox"/> Did not complete (explain in comments)</p> <p>Comments: As noted in AFI #2, in one instance, during development of communications for the Liaison Group, documents were found to lack appropriate security markings</p> | BM |

Exercise Objective 4: Support Responder Qualification and Familiarity

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|-----------------------|---|---|--------------------|
| All Responders | a. Reinforce responder qualifications by increasing familiarity with NRC's incident response program, tools, procedures, and the specific roles and responsibilities of each participant. | <ul style="list-style-type: none"> • Proper use of procedures. (IRP 140 B.13.e) <input checked="" type="checkbox"/> Observed task completion with no issues <input type="checkbox"/> Observed some/minor issues (explain in comments) <input type="checkbox"/> Observed major issues (explain in comments) <input type="checkbox"/> Did not complete (explain in comments) <p>Comments: None</p> | |

Exercise Objective 5: Demonstrate Timely Notification and Staffing of the Emergency Response Organization (ERO)

| | <u>Activity/Critical Tasks</u> | <u>Key Observation Points</u> | <u>Observer/CE</u> |
|-------------------------|---|--|--------------------|
| Planning Section | a. Validate the effectiveness of the NRC's Automated Notification System in alerting pre-established exercise roster ERO participants of the simulated event, and timely staffing of the NRC response centers (e.g., Headquarters Operations Center, Region III IRC). | <ul style="list-style-type: none"> • Coordinate with all sections and units to determine staffing needs. (IRP 140 B.11.g) <input checked="" type="checkbox"/> Observed task completion with no issues <input type="checkbox"/> Observed some/minor issues (explain in comments) <input type="checkbox"/> Observed major issues (explain in comments) <input type="checkbox"/> Did not complete (explain in comments) <p>Comments:</p> <ul style="list-style-type: none"> - Accelerated Notification made IAT Briefed in accordance with R.2 Procedure Activation done within fifteen minutes as required for security events. | <u>BP</u> |

Attachment B: Exercise Participants

| DC Cook – Watch Bill | | |
|-------------------------------------|---|---|
| Position | Region | HQ |
| Sr. NRC Leadership | | Cmmr. Marzano |
| Sr. NRC Leadership - Staff | | Alysia Bone |
| Response Director | | Kathy Brock |
| Deputy Response Director | | Russ Felts |
| Sr. Agency Rep (Licensee) | | |
| R3 Sr. Leader / Support / Deputy RD | Jared Heck | |
| Sr. Agency Rep (NRITF) | | |
| RD Support Staff (Tech Writer) | | Caty Nolan (pilot role) |
| Public Information Officer | | Scott Burnell (@ RI IRC) Christine Saah Nazer |
| Public Information Staff | Prema Chandrathil | Ivonne Couret Holly Harrington (A) |
| Liaison Officer | | Jane Marshall Cindy Rosales-Cooper (Observer) |
| Liaison – Federal | | Russell Chazell |
| Liaison – State | Sara Forster (@SEOC) | |
| Liaison – Congressional | | |
| Liaison – International | | |
| Operations Section Chief | | Steve Bloom (OSC) Brian Smith (training) |
| Reactor Safety Group Leader | Gregory Roach | |
| Reactor Safety Oversight | Doris Chyu SRI – Russ Cassara RI – Zach Helgert | Donna Williams ENS - Nazila Tehrani (training) Christopher Prescott (training) |
| Reactor Safety Assessment | Courtney St. Peters (training) | Loren Howe Timothy Ayers (training) Daneira Meléndez-Colón (training) David Nold (training) Harry Wagage (training) |
| Protective Measures Group Leader | | Michele Hart Sean Meighan (in-training) |
| PM Oversight | Geoffrey Warren | Shivani Mehta |
| PM Assessment | Sarah Bakhsh | Ariano Munden Cynthia Barr Karen Pinkston |

| DC Cook – Watch Bill | | |
|---------------------------|---|---|
| Position | Region | HQ |
| Security Group Leader | | Jeff Bream (@Region 1) |
| Security Oversight | | Phil Brochman |
| Security Assessment | Steven Cavanaugh Kevin Maloney (@ ICP) | Niry Simonian Sam Bina Ellie Cohn (in-training) FBI Embed: Anthony (Tony) Gonzalez Manuela Camara |
| Planning Section Chief | | Vic Cusumano |
| Situation Unit | Victoria Espinoza | Laurel Bauer Michael Orenak |
| Staffing Unit | Marya Hatfield | Rachel Sanchez Ashley Smith |
| Logistics Section Chief | | Charles (Milt) Murray |
| Personnel Unit | | Lorena Walls |
| Facilities Unit | | David Herrington |
| IT/Comms Unit | | Omar Khan Steve Sage |
| Knowledge Wall Operator | | Lakishia Richardson – RD |
| Exercise IT Support | Thomas Magee Christian Cole | OCIMS Contractors Erik Gruber (OCIO) |
| Observers | Michael Waters (Response Director) Mike McCopin (Response Director) Damaris Marcano (Logistics) Angelo Vergura (Logistics) Damon Shuler (Security) Ericka Wagner (Security) Josh Rhodes (Security) Colin Smith (Reactor) Beth Wetzel (Reactor) Cherie Crisden (Planning) Shani Seaton (Protective Measures, Planning) Nestor Makris (Planning) Gena Poe – (Escorting Surry Employees) | |
| Controllers: | | |
| Command | Michael Jones | Jeffery Grant/Melissa Knapp |
| Public Affairs | Michael Jones | |
| Reactor Safety Group | Brent Boston Dan Sargis | Ken Anderson |
| Protective Measures Group | | Minh-Thuy Nguyen |
| Security Group | Brent Boston | Sheila Rivera Elizabeth (Beth) Reed |

| DC Cook – Watch Bill | | |
|----------------------|--|-----------------|
| Position | Region | HQ |
| Planning Section | Brent Boston Daniel Sargis Brian Parks | |
| Liaison Group | | Bennet McEllis |
| Logistics Group | | Phyllis Jenifer |
| HOO/HERO | | Brian Smith |



DC Cook Emergency Exercise

June 24, 2025

Exercise Plan

Exercise Planning Team:

Region III

Michael Jones
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Dan Sargis
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Headquarters

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Ken Anderson
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Melissa Knapp
Melissa.Knapp@nrc.gov

Revision 0

Enclosure 2

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SECTION 1: GENERAL INFORMATION

Introduction

The NRC incident response exercise program is designed to establish a learning environment for NRC players to exercise emergency response plans, policies, and procedures.

Exercise Objectives

The objectives for this exercise are:

1. Enhance Senior Leadership Engagement in Emergency Response
 - a. Provide a realistic and meaningful emergency response experience for NRC senior leaders, tailored to their respective roles.
 - b. Ensure Commissioner Marzano's engagement and support are consistent with expectations for a real-world event, considering the scope and severity of the presented scenario.
2. Demonstrate Effective Internal Communications and Documentation
 - a. Verbal Communications: Evaluate the quality, timeliness, and effectiveness of verbal communications between NRC personnel assigned to:
 - i. DC Cook Control Room
 - ii. Region III Incident Response Center (IRC)
 - iii. NRC Headquarters Operations Center
 - iv. Licensee's Incident Command Post
 - v. State Emergency Operations Center (EOC)
 - b. Written Communications & Documentation: Demonstrate accuracy and completeness in response documentation, including:
 - i. Position logs
 - ii. Event summary/timeline
 - iii. Response Status Reports (RSRs)
 - iv. Action Plans (APs)
3. Demonstrate Effective External Coordination
 - a. Assess the NRC's coordination with external stakeholders, including:
 - i. Licensee Coordination: Effective interaction with DC Cook site and EOF responders, including timely notifications to the Headquarters Operations Officer (HOO) and use of:
 1. External Security Bridge
 2. Emergency Notification System (ENS) Bridge
 3. Health Physics Network (HPN) Bridge
 - ii. State Engagement: Engagement with the State of Michigan emergency management counterparts.
 - iii. Federal Interagency Coordination (Simulated): Interactions with simulated federal partners such as IMAAC, NSC, FBI, FEMA, DHS, and Congress.

4. Support Responder Qualification and Familiarity
 - a. Reinforce responder qualifications by increasing familiarity with NRC's incident response program, tools, procedures, and the specific roles and responsibilities of each participant.

5. Demonstrate Timely Notification and Staffing of the Emergency Response Organization (ERO)
 - a. Validate the effectiveness of the NRC's Automated Notification System in alerting pre-established exercise roster ERO participants of the simulated event, and timely staffing of the NRC response centers (e.g., Headquarters Operations Center, Region III IRC).

Extent of Participation

- Licensee
- State of Michigan
- Berrien County
- Berrien County Sheriff's Department
- Local Law Enforcement, FBI, and local services through the Incident Command Post
- NRC (refer to Appendix C for NRC watch bill) Headquarters Responders and Operations Officers o Region III Responders at:
 - Incident Response Center
 - Michigan State Emergency Operations Center (SEOC)
 - Incident Command Post
 - Licensee Simulator Control Room, Emergency Operations Facility and Alternative Facility

Observer Coordination

Observers visit or view selected segments of the exercise. Observers shall not play in the exercise, interface with any of the players, or perform any control or evaluation functions.

Charging Time

- Managers, Administrative Staff, and Resident Inspectors should use their standard charge codes.

- Staff participants should charge time spent during the exercise and hotwash to **CAC A10675**, "Incident Response Exercise – Operating Reactors." Time spent in training and exercise pre-brief should be charged to **CAC ZG0106** "Training Attendance."

SECTION 2: EXERCISE LOGISTICS

Exercise Start and Termination Instructions

Exercise activities are scheduled from **6:30 am Central Time (CT) / 7:30 am Eastern Time (ET) to 12:00 pm CT / 1: pm ET** on June 24, 2025. This time includes the exercise hot wash. All exercise participants are expected to be involved until the end of the exercise. The NRC Controllers may inform participants when the exercise has terminated.

- Resident Inspector(s) are to be in their pre-designated locations by **7:30 am ET**.
- Incident Command Post (ICP) participants should pre-stage by **8:00 am ET** at the incident command post. Facility addresses and information is provided in Appendix A of this Exercise Plan.
- The State Emergency Operations Center (EOC) participants will stage outside of the Michigan SEOC by **8:00 am ET** and enter play when the facility is activated.
- All other exercise participants will remain at their respective work locations until notified to response to either the HOC or Regional IRC. These notifications will be made by the Automated Notification System (ANS), alerting the DC Cook participants to respond to your respective centers. If any designated participant who does not receive the ANS call by 8:15 am ET, should respond to your respective response center thereafter, and report the failure to a controller.

Virtual Counterpart Links and Bridge Information

- Participants will communicate with each other using MS Teams. See Appendix B.
- The HOO telephone bridges will be used for communication with participants who do not have access to MS Teams (e.g., Resident Inspector). Each MS Teams Channel will be connected to a corresponding telephone bridge. Communications with the licensee will occur via the appropriate telephone bridge (e.g., External Security Bridge, ENS Bridge, HPN Bridge).
- If Teams fails, the HOO conferences will be used for all communications.

Resources During Exercises

The following resources will be used during the exercise:

- WebEOC: <https://webeoc.nrc.gov>
 - Information sharing boards for response-related processes.
- Response eLibrary: <https://usnrc.sharepoint.com/teams/ir-elibrary>
 - Read-only information for responders to use as reference.
 - NRC response procedures are also located on this site.

- Response Shared Drive: <https://usnrc.sharepoint.com/teams/ir-shared>
 - Write-access folders available for responders to share information internally.
 - Documents developed during the exercise should be uploaded to the Response Shared Drive.
 - Contains specific information about this exercise, including this document.

SECTION 3: PLAYER INFORMATION AND GUIDANCE

Before the Exercise

- Review appropriate procedures located in the Response Shared Drive:
<https://usnrc.sharepoint.com/teams/ir-shared>.
- Refresher Training in each functional area will be provided, along with an exercise pre-brief that will cover exercise specific logistics prior to the exercise. Participants will be provided meeting schedulers for those occurrences. If you cannot make it to your team training session, please contact an exercise coordinator to arrange alternate arrangements.
- Plan for food and drink. At NRC facilities, bring your own. At licensee facilities, lunch can be purchased, or you can bring your own.

During the Exercise

- Bring your **laptop and headset** to your response location. These will allow you to view WebEOC, SharePoint, and MS Teams.
- Use your procedures and work as a team.
- Respond to exercise events and information as if the emergency was real.
- You are expected to obtain other necessary information through existing emergency information channels, but do not contact anyone (NRC, licensee, state, etc.) outside the official exercise communications channels (NRC watch bill, ENS/HPN, etc.).
- Parts of the scenario may seem implausible. Recognize that participating organizations have exercise objectives to satisfy and may require incorporation of unrealistic aspects.
- All exercise communications will begin and end with the statement “This is a drill.” This precaution is taken so that anyone who overhears the conversation will not mistake exercise play for a real-world emergency.

Exercise Artificialities

- Staffing. To maximize training value and focus on the exercise objectives, all responders will pre-stage rather than being contacted to respond. Staffing at the EOCs, ICP, EOF, and JIC will be done once the respective facility activates.
- RSR/Action Plan Development. For a real event, RSRs and Action Plans would be developed based upon the Planning Section procedure and the natural pace of the event, but to accommodate participation and the accelerated pace of the exercise, the controllers will provide injects for when to produce these products.
- RD Location. In a real event, the initial RD location and any subsequent transfers are determined based on procedural guidance and the specific circumstances of the incident. However, during an exercise, controllers may adjust the location and/or timing of RD assignments or transfers as needed. If an RD transfer occurs, several other responders may be required to shift roles accordingly.
- Long-Term Activities. To focus on the exercise objectives, many long-term activities, such as subsequent shift staffing, dispatching staff, etc., may not be demonstrated during the exercise. Teams should seek to perform all the steps in their procedures while focusing on the exercise objectives. Contact an exercise controller for questions during the exercise.
- Commissioner Marzano's Participation. During this exercise, Cmmr. Marzano will interface with the response teams and receive briefings from the designated Response Directors, and engage in appropriate senior level activities throughout the exercise.

After the Exercise

- Participate in your team's discussion immediately following the end of the exercise. Focus on higher-level issues which need discussion during the Hotwash.
- Provide additional positive comments and areas for improvement that are solicited after the exercise (e.g., via e-mail).

Hotwash

- Hotwash discussions will be led by the Response Team Leads. Prior to the hotwash, each team should conduct their own individual team discussions to capture their perspectives on the exercise to allow for a more effective overall hotwash.

After Action Report

- The After-Action Report (AAR) will document the overall exercise performance including strengths and areas for improvement.
- The feedback from exercise participants and evaluators/controllers will be evaluated and lessons learned will be compiled by the ERCs.

APPENDIX A: NRC EXERCISE WATCH BILL

| DC Cook – Watch Bill | | |
|--------------------------------|---|--|
| Position | Region | HQ |
| Sr. NRC Leadership | | Cmmr. Marzano |
| Response Director | | Kathy Brock |
| Deputy Response Director | Jared Heck | Russ Felts |
| Sr. Agency Rep (Licensee) | | |
| Sr. Agency Rep (UCG) | | |
| Sr. Agency Rep (NRITF) | | |
| RD Support Staff (Tech Writer) | | Caty Nolan (pilot role) |
| Public Information Officer | Scott Burnell | Christine Saah Nazer |
| Public Information Staff | Prema Chandrathil | Ivonne Couret Holly Harrington (A) |
| Liaison Officer | | Jane Marshall Cindy Rosales-Cooper (Observer) |
| Liaison – Federal | | Russell Chazell |
| Liaison – State | Sara Forster (SEOC) | |
| Liaison – Congressional | | Carolyn Wolf |
| Liaison – International | | |
| Operations Section Chief | | Brian Smith (OSC training) Steve Bloom (OSC over instruct) |
| Reactor Safety Group Leader | Greg Roach | |
| Reactor Safety Oversight | Doris Chyu SRI – Russ Cassara RI – Zach Helgert | Donna Williams ENS - Nazila Tehrani (training) Christopher Prescott (training) Ricardo Lantigua (training) |

| | | |
|----------------------------------|---|---|
| Reactor Safety Assessment | Gregory Roach Courtney St. Peters (training) | Loren Howe Timothy Ayers (training) Daneira Meléndez-Colón (training) David Nold (training) Harry Wagage (training) David Coy (training) |
| Protective Measures Group Leader | | Michele Hart Sean Meighan (in-training) |
| PM Oversight | Geoffrey Warren | Shivani Mehta |
| PM Assessment | Sarah Bakhsh | Ariano Munden Cynthia Barr Karen Pinkston |
| Security Group Leader | | Jeff Bream (@ Region 1) |
| Security Oversight | Steven Cavanaugh | Phil Brochman |
| Security Assessment | Kevin Maloney - ICP | Niry Simonian Sam Bina Ellie Cohn (in-training) FBI Embed: Anthony (Tony) Gonzalez Juan Gonzalez |
| Planning Section Chief | | Vic Cusumano |

| DC Cook – Watch Bill | | |
|---------------------------|--|---|
| Position | Region | HQ |
| Situation Unit | | Laurel Bauer Orenak, Michael |
| Staffing Unit | Marya Hatfield | Rachel Sanchez Ashley Smith |
| Logistics Section Chief | | Charles (Milt) Murray |
| Personnel Unit | Vickie Espinoza Grace Powell Moore (training) | Lorena Walls |
| Facilities Unit | | David Herrington |
| IT/Comms Unit | | Omar Khan, Steve Sage, OCIMS Contractors, Erik Gruber (OCIO) |
| Knowledge Wall Operator | | Lakishia Richardson – RD |
| Exercise IT Support | | |
| Observers | FBI-IT-CS – MAPA Brandon Moulder, IA Kathryn Walker, IA Aubrey Wetzelberg , IA Gabrielle Ma, SSA Brian Kaiser Damaris Marcano (Logistics Section) Angelo Vergura (Logistics Section) | |
| Simcells | | |
| Controllers: | | |
| Command | Michael Jones | Jeffery Grant/Melissa Knapp |
| Public Affairs | Michael Jones | |
| Reactor Safety Group | Dan Sargis | Ken Anderson |
| Protective Measures Group | | Minh-Thuy Nguyen |
| Security Group | Brent Boston | Sheila Rivera |
| Planning Section | Brian Parks (R4) | |
| Liaison Group | | Bennett McEllis |
| Logistics Group | | Phyllis Jenifer |
| HOO/HERO | | Kirby Scales |

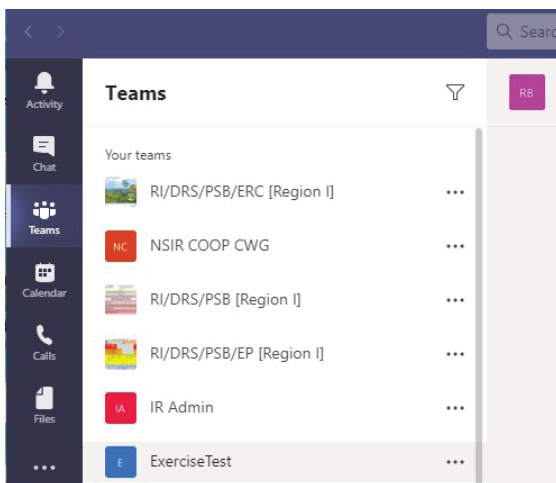
UI – Under Instruction

ICP – Incident Command Post (local emergency responder coordination location)

APPENDIX B: USE OF MS TEAMS FOR PHONE/VIRTUAL BRIDGES

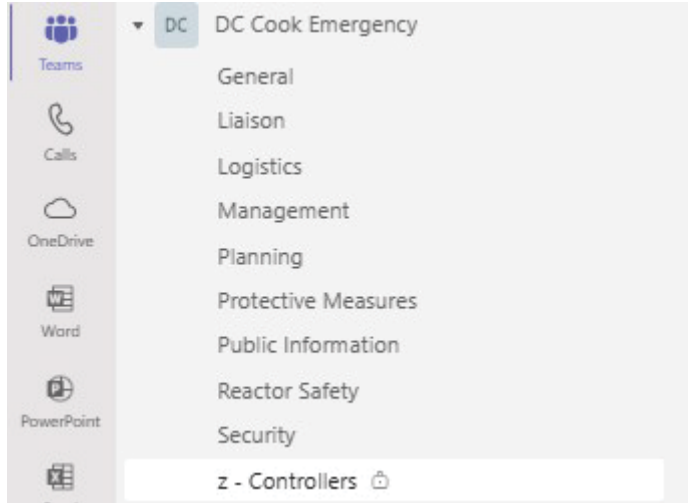
Overview

1. MS Teams is being used for communications during incident response exercises. This tool allows for rapidly switching between phone conferences without needing to constantly redial the Headquarters Operations Officers (HOOs). MS Teams was selected since it closely simulates communications through the HOO conferences, and it is a tool that is being used by the NRC already.
2. Please note that MS Teams has many other capabilities that might be integrated into future response (such as chat/IM, or document sharing). Currently we are asking participants to only use MS Teams for phone conferencing during exercises to avoid confusion with written response products being in various locations (WebEOC, Response Library, eLibrary, etc.).
3. Phone conferences with the licensee (ENS/HPN) will still use the normal HOO bridges to maintain recording capabilities and HOO oversight.
4. You should have been sent a notice that has the subject “You have been added to a team in Microsoft Teams” with the exercise name. After receiving this email, the exercise team will show up in your list of MS Teams. To see your Teams, click on the Teams button on the left of the Teams window:

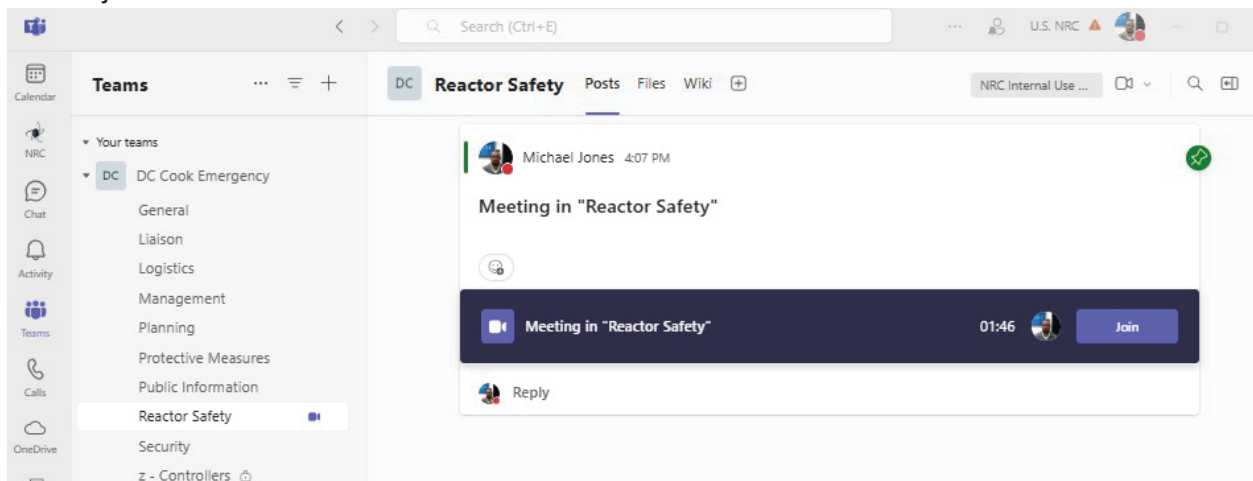


To Join a Phone Conference

1. Click on the Teams button on the left edge of your MS Teams Window. Click on the Channel (conference name) under the exercise you wish to join.



2. If the conference call is already in progress, the Channel display will have a button to join the call like this:



To Switch Between Conferences

1. While in one conference call, you can easily switch to another conference call. You can have up to four calls open at the same time, or you can hang up and reconnect using the instructions above (To Join a Phone Conference).

To Connect to MS Teams on a Mobile Device

1. For remote responders or responders who wish to have mobility, MS Teams can be loaded onto a mobile device (contact the NRC help desk for assistance on installing and configuring MS Teams).
2. The default configuration of MS Teams will use approximately 10 GB of data per hour. To reduce this to approximately 250MB per hour, tap on your icon at the top right – Settings – Data and storage – Reduce data usage – Cellular. This feature has not been thoroughly tested so do not attempt this if you have concerns about data limits/cost on your device.

Mute “Bug” with Remote Participants

1. Most MS Teams Channels are connected to corresponding HOO conferences. This can be identified by viewing the list of participants and confirming that one of them is “301816-5100”.
2. This connection allows responders without MS Teams to communicate with the responders on MS Teams by calling the HOOs and being placed on the corresponding conference. For example, if a Resident Inspection calls the HOO to be placed on the Reactor Safety Counterpart Link, they will then be connected to the Reactor Safety Counterpart Channel in MS Teams.
3. There is a “bug” with this configuration. If anyone in MS Teams either clicks on “Mute All” or mutes the HOO line, then the HOO line cannot be unmuted. This should be avoided, because if this happens during the exercise, then the HOO line must be disconnected and reconnected. Ask a controller for assistance or:
 - a. To remove the HOO line, under participants, right click on the HOO line and click on “Remove from meeting”
 - b. To reconnect the HOO line, under Participants, in the box that says, “Invite someone or dial a number,” type in the HOO phone number “3018165100” then click add phone next to the number. This will call the HOO. When they answer asked to be placed on the correct corresponding conference. Any responders who previously called into the HOOs will be automatically connected.

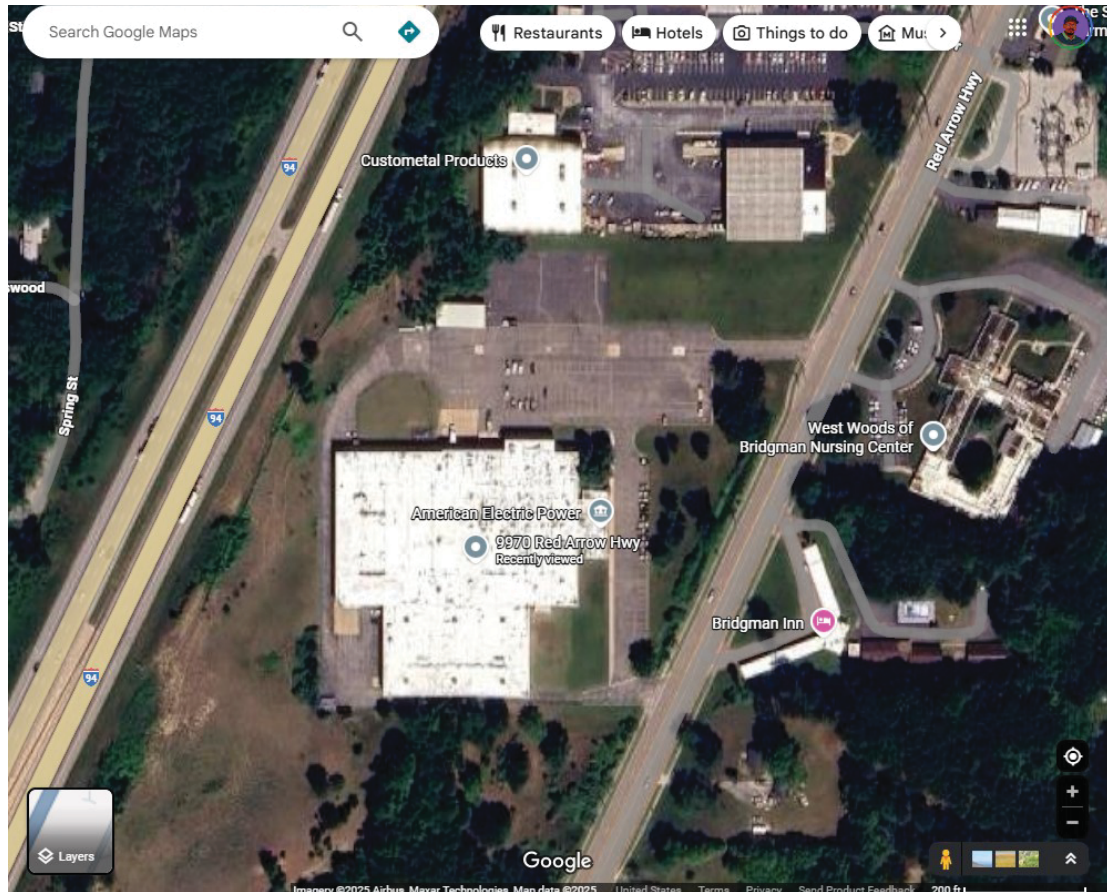
APPENDIX C: BRIEFING/TRAINING SCHEDULE

| Functional Team/Position | Training - Date/Time | Instructors |
|---|------------------------------|------------------------|
| NRC Outreach Presentation to Licensee | June 9, 2025 – 1230-1300 ET | Michael Jones |
| Security | June 11, 2025 – 1000-1130 ET | Sheila Rivera |
| Protective Measures | June 11, 2025 – 1300-1430 ET | Minh-Thuy Nguyen |
| Planning | June 12, 2025 – 1000-1130 ET | Brian Parks |
| Public Information | June 16, 2025 – 1300-1400 ET | Michael Jones |
| Logistics | June 16, 2025 – 1400-1500 ET | Phyllis Jenifer |
| Ops Section Chief | June 16, 2025 – 1500-1600 ET | Ken Anderson |
| Response Director / Sr. Agency Representative | June 17, 2025 – 0900-1000 ET | Jeff Grant |
| General Training Makeup Session | June 18, 2025 – 1400-1530 ET | All – breakout session |
| Reactor Safety | June 20, 2025 – 1400-1530 ET | Ken Anderson |
| Liaison | June 23, 2025 – 1300-1430 ET | Bennett McEllis |
| DC Cook Exercise Pre-Brief | June 18, 2025 – 0900-0945 ET | Michael Jones |

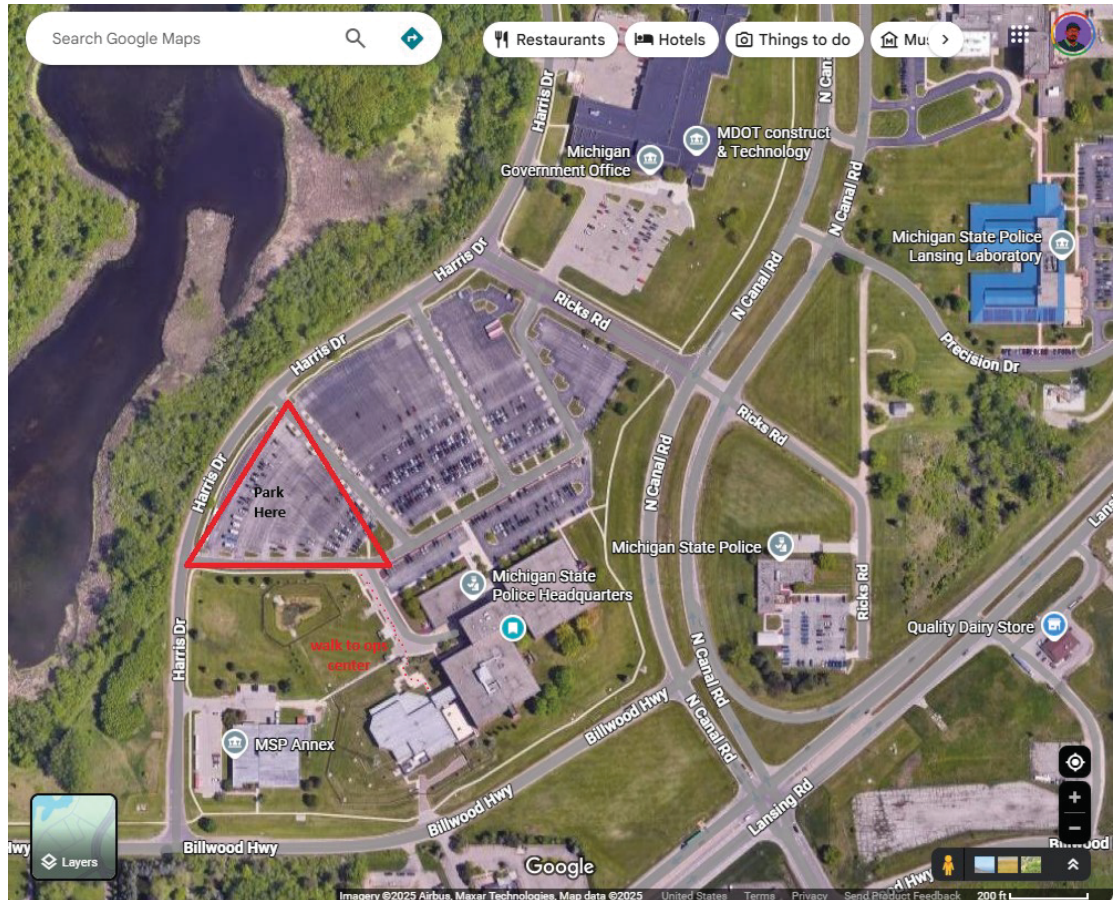
APPENDIX D: EMERGENCY RESPONSE FACILITY ADDRESSES

ICP/SEOC/EOF are located at the following addresses:

1. **ICP:** [9970 Red Arrow Hwy. Bridgman MI 49106](#)
 - a. Site or NRC badge required
 - b. When the ICP is activated, the entrance is around in the back of the building. The Sheriff's Dep. Will direct people around to the back.



2. **Michigan SEOC:** [7150 Harris Dr. Dimondale, MI. 48821](https://www.google.com/maps/place/7150+Harris+Dr,+Livonia,+MI+48150/@43.088,83.818,15z)



3. **EOF:** [500 Circle Dr, Buchanan, MI 49107](https://www.google.com/maps/place/500+Circle+Dr,+Bucan,+MI+49107/@43.088,83.818,15z)

- a. Sign in desk in front
- b. Site Badge required