



Enhancements in Emergency Preparedness (EP) Drills and Exercises – A State Perspective

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Hostile Action-Based Emergency Response Drills

- NEI 06-04, Rev. 1, October 2007, “Conducting a Hostile Action-Based Emergency Response Drill”
 - Based on feedback from the pilot drills and stakeholders
 - Definite enhancement to NEI 06-04 Rev. 0



NEI 06-04 Rev. 1 Enhancement - Example

- Exercise Timeline (NEI-06-04 Rev. 1)
 - Now discourages use of two-phase scenario with time jump
 - Offsite agency concerns with “time jump”
 - Confusing to Exercise Participants
 - Unnecessary Artificiality



Hostile Action-Based Emergency Response Drills

- NEI 06-04, Rev. 1 Calls for Potential for Radiological Release, but Not Actual Release
- BRP Believes Radiological Releases Should be Permitted
 - Should Not be Absolutely Required
 - Should Not be Absolutely Excluded



Hostile Action-Based Emergency Response Drills

- Pilot Drills are LEARNING EXPERIENCES
 - Scenario Development Needs to Involve All Stakeholders
 - Question use of drills to satisfy Performance Indicators – intended as “no fault” opportunity to challenge program
 - Apply Lessons Learned from Pilot drills consistently across all utilities and share with offsite agencies.



Enhancements needed to Hostile Threat based drills

- Standard Guidance needed for NPP
 - Command and Control
 - Staging Areas for Offsite Responders
 - Communications
 - Credentialing
 - Incident Command System Training



Biennial EP (Plume Exposure) Exercises

- Current road blocks – Some FEMA regions mandating that PAGS always be exceeded at 5 miles.
- Based on outdated REP-14 and Interim Draft REP Manual that never received stakeholder involvement.
- Stakeholder involvement is needed in evaluating radiological release options



Problems with requiring PAGS to be exceeded at 5 miles

- Negative Operator Training – mitigative actions cannot have significant impact, may require as high as 30% core melt.
- Negative ERO training
- Negative impact on Field Teams
- False Public perception
- Negates use of realistic and more challenging accident scenarios



Radiological Releases exceeding PAGs

- Currently under review by NRC, NEI and FEMA
- Must have stakeholder input - ORO's and ERO's prior to publishing proposed changes in Federal Register.
- Stakeholder involvement was a vital component of the current Evaluation Methodology Criteria and was performed prior to FR publication



Biennial EP (Plume Exposure) Exercises

- Scenario development currently only includes licensee, State, local and FEMA Representatives
- Potential Enhancement : Include NRC representation at scenario development meetings.
- Add realism and challenging aspects to scenario and minimize potential for negative Operator, ERO and ORO Training.



FEMA REP Program Manual

- Changes Needed with Stakeholder involvement
 - Input During Formative Phase of Process
 - Provide for Timely Input
 - Exercise Methodology
 - Extent of Play – Release magnitudes
 - Objectives
 - Evaluation Criteria
 - Incorporate Lessons Learned
