

TASK 17: PREPARE SUMMARY EXERCISE REPORT

Description

Following the exercise, the RAC Chair prepares a summary exercise report that includes background information on the exercise and a listing and brief description of exercise inadequacies and required corrective actions.

Milestone

Within 30 days of the exercise date, the RAC Chair provides FEMA Headquarters with a draft summary exercise report. Within 40 days of the exercise date, FEMA Headquarters provides written comments to the Region on the draft summary report. Within 50 days of the exercise date, the FEMA Regional Director transmits the summary exercise report to the State, RAC, FEMA Headquarters, and to the licensee. Upon receipt, FEMA Headquarters forwards a copy of the summary exercise report to NRC Headquarters. Upon receipt of the summary report, the State may submit written comments to the RAC Chair.

References

Standard Exercise Report Format (SERF) Instruction Manual (issuance date to be determined).

Products

Summary exercise report.

Guidance

In order to provide more timely feedback to ORO's on their performance during an exercise, a brief summary exercise report should be prepared by the RAC Chair and submitted to the State within 50 days of the exercise. This report should be brief and should provide background information on the exercise, a listing of participating organizations and agreed upon objectives, and a listing and brief description of exercise inadequacies and required corrective actions. **Exercise inadequacies** are defined as exercise issues that require corrective or remedial action within specified time frames.

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Deficiencies and **Areas Requiring Corrective Action (ARCA)** are considered exercise inadequacies. Because **Areas Recommended for Improvement (ARFI)** do not have a significant impact on the protection of public health and safety, they are not considered exercise inadequacies.

The length of the report is expected to be a function of the number of participating jurisdictions and the number of observed or identified inadequacies. RAC Chairs should strive to keep the summary report as brief as possible. Identification and description of inadequacies should be consistent with those contained in the notification letter sent to the State 10 days after the exercise. Specific guidance on content and format of the summary exercise report will be provided in the SERF Instruction Manual to be published by FEMA Headquarters. The following guidelines for summary exercise report content and format should be followed until the issuance of the SERF Instruction Manual. The standard outline is indicated below.

- I. Introduction
 - A. Exercise Background
 - B. Exercise Participants
 - C. Exercise Objectives
- II. Summary Listing and Brief Description of Exercise Inadequacies
- III. Recognition of State and Local Organizations' Participation

The Exercise Background section should indicate the name and location of the nuclear power plant, the date of the exercise, dates of previous offsite emergency preparedness exercises, the date of 44 CFR Part 350 approval for the site (if applicable), a very brief summary of the exercise scenario, and a brief explanation of FEMA's classification system for exercise inadequacies.

The Exercise Participants section should list participating utilities, State and local government agencies, and private voluntary agencies. The number of Federal evaluators and their organizational affiliations should also be indicated.

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The Exercise Objectives section should list each participating organization and the objectives that it was responsible for demonstrating according to the exercise scenario and extent-of-play agreements.

The section on exercise inadequacies should provide a brief, narrative description of each Deficiency or ARCA identified for each objective demonstrated during the exercise. Inadequacies identified in this section should be consistent with those identified in the notification letter to the State (Task 16).

In classifying exercise inadequacies as **ARCAs**, the following definition should be applied. An **ARCA** is an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety. The correction of an ARCA is required by the next scheduled biennial exercise. An ARCA may be reclassified as a Deficiency under two conditions: First, when the collective impact of two or more ARCAs on an organization's emergency functioning precludes adequate protection of public health and safety. Second, for recidivism, when an organization repeatedly demonstrates the inability to correct one or more previously-identified ARCAs over a period of two or more biennial exercises.

This section of the summary exercise report should also contain recommendations for correcting each exercise inadequacy identified.

The final section of the summary report should consist of a brief (one page or less) narrative acknowledging the participation of State and local jurisdictions and voluntary agencies and commending those that performed well during the exercise.

The primary reason for providing formal documentation of exercise inadequacies to States is to facilitate prompt correction of these identified problems. While it is FEMA's intent to provide this formal documentation to States within 50 days, there may be circumstances for which this time frame may not be met. However, through the consultation process initiated immediately following each exercise, all involved exercise participants should be made aware of significant issues and problems for which prompt correction is necessary. Subsequent formal notification of exercise inadequacies more than 50 days after the exercise date should not, therefore, preclude their prompt correction within specified time frames.