

REP Program Manual Summary of Changes, January 2016 Update

Introduction

This edition of the REP Program Manual (RPM) Podcast will focus on the revisions made for the January 2016 update.

At the beginning of 2015, the REP Program began a new process where the RPM is revised/updated every six months by the RPM Integrated Project Team (IPT), with new editions published in January and July. These updates will ensure that the RPM remains up-to-date and that questions, comments, or concerns will be addressed in a timely manner.

This revision of the RPM encompasses the input of a broad range of stakeholders. The inputs that state, local, and tribal stakeholders send to the Regional REP Program staff feed the FAQ process that helps shape the updates to the RPM. In general, this revision focused on continued refinement of guidance, driven largely by questions and issues raised by Regional REP staff and offsite response organizations (OROs). The changes that we are about to discuss have been evaluated at length and agreed upon by the RPM IPT.

Change 1: Planning Standards/Core Capabilities Crosswalk

Changes were made to the Planning Standards/Core Capabilities Crosswalk in Exhibit II-1 in the RPM. The core capability “Fire Management and Suppression” was added to the “Response” mission area. The core capability “Public and Private Services and Resources” was replaced with “Logistics and Supply Chain Management,” and a few other core capabilities had slight modifications to their names, but not their scope.

Explanation

The language in the Planning Standards/Core Capabilities Crosswalk was revised to align with the updated National Preparedness Goal, which was published in October 2015.

Change 2: Backup and Alert Notification Messages

Guidance was added in Evaluation Criterion E.6, under “Design Objectives for Alert and Notification to the Public.” This revision added language regarding how all backup messages, at a minimum, should include: (1) a statement that an emergency exists at the plant(s) and (2) instructions regarding where to obtain additional information.

Explanation

Guidance was added to align language in Evaluation Criterion E.6 with language found in both Demonstration Criterion 5.a.3, as well as in the REPP Exercise Preparation Guide (EPG).

Change 3: EAS Equipment

Guidance on memory capacity of Emergency Alert System (EAS) equipment for initial messages was removed from Evaluation Criterion E.7.

Explanation

The language was removed because the Federal Communications Commission (FCC), and not FEMA, should provide guidance for EAS equipment.

Change 4: Dosimeter Correction Factors

Language on dosimeter correction factors was revised in Evaluation Criterion K.3.a. This revision clarifies that an administrative correction factor of 5 is a starting point for converting direct-reading dosimeter (DRD) reading into an estimated total effective dose equivalent (TEDE).

Explanation

Guidance was replaced to ensure the understanding that the default administrative correction factor of 5 is not a required correction factor, but rather a suggested starting point for converting DRD readings into estimated TEDE.

Note:

The following four changes were made to RPM to comply with the “New Terms to Classify REPP Exercise-Related Observations and Issues Memorandum,” issued by Andrew Mitchell, the former Director of the Technological Hazards Division (THD).

Change 5: Level 1 Findings, Level 2 Findings, and Plan Issues

The terms “Level 1 Finding” and “Level 2 Finding” replaced the terms “Deficiency” and “ARCA”. Additionally, the definition for “Plan Issue” was slightly revised.

Explanation

“Level 1 Findings” and “Level 2 Findings” replaced the terms “Deficiencies” and “ARCAs,” and the definition for “Plan Issue” was revised, to better align REPP’s exercise program with the Homeland Security Exercise and Evaluation Program (HSEEP) as well as the tenets of the National Preparedness System (NPS).

Change 6: Demonstrated Strengths, Best Practices, and Lessons Learned

Language on demonstrated strengths, best practices, and lessons learned was added to Part III of the RPM, in Section 6. “Documenting REP Exercises,” under a. “Identifying Exercise Outcomes and Issues.” The added language was placed under a new section titled “Additional Observations.”

A demonstrated strength is an observed action, behavior, procedure, and/or practice that is worthy of special notice and recognition.

A best practice is an exemplary, peer-validated technique, procedure, good idea, or solution that works and is solidly grounded in actual operations, training, and exercise experience.

A lesson learned is knowledge and experience, positive or negative, derived from actual incidents, as well as those derived from observations and historical study of operations, training, and exercises.

Best practices and lessons learned should be shared within the REP community. FEMA’s Lessons Learned Information Sharing (LLIS) program is a tool that can be used for distributing best practices and lessons learned.

Explanation

Language on demonstrated strengths was added to Part III of the RPM to provide evaluation guidance on capturing knowledge and experience gained from both positive and negative actions during demonstrations. When adding language on demonstrated strengths in the RPM, REP Program staff decided to emphasize best practices and lessons learned by updating existing information.

Change 7: Information Technology Tools

Language on the information technology tool, the Exercise Evaluation Tool, was removed from Part III of the RPM, in Section 6. “Documenting REP Exercises,” under d. “Developing the After-Action Report.”

Explanation

Information on the Exercise Evaluation Tool (EET) was removed from the RPM because the tool is no longer in use.

Change 8: Improvement Plans

Additional language on Improvement Plans was added to Part III of the RPM, in Section 6. “Documenting REP Exercises,” under e. “Developing the Improvement Plan.” The language now addresses follow-up actions by the FEMA Regions to ensure that corrective actions included in Improvement Plans are being met by the OROs.

Explanation

Additional language on Improvement Plans was added to the RPM to comply with the “New Terms to Classify REPP Exercise-Related Observations and Issues Memorandum.” The memo emphasizes the Improvement Plan process and the changes made to the RPM enhance the REP program’s approach to improvement planning.

Change 9: Backup Communications Systems

Guidance on backup communications systems in Demonstration Criterion 1.d.1 was revised to clarify that both field operations and fixed facilities should have at least one backup communications system.

Explanation

The former language in the RPM stated that only fixed facilities should have a backup communications system. However, REP Program guidance states that both fixed facilities and field operations should have backup systems. The revised language now clarifies that both field operations and fixed facilities should have at least one backup system.

Change 10: Annual Letter of Certification Review Guide

Language in the Annual Letter of Certification Review Guide was revised under the “Requirement” section, and the FEMA-REP-10 reference has been removed.

Explanation

Language in the Annual Letter of Certification Review Guide, under the “Requirement” section, was revised to clarify that the Planning Standards originate from 44 CFR part 350.5, and not NUREG-0654/FEMA-REP-1. The reference to FEMA-REP-10 was removed since the document was absorbed into the RPM in January 2015.

Change 11: Reformatting of Checkmarks

In Part II of the RPM, under the Evaluation Criteria guidance, the checkmarks were revised to lowercase Roman numerals and all sub-bulleted checkmarks were revised to lower-case letters.

Explanation

The checkmarks in Part II of the RPM were reformatted so that the information presented could be more easily referenced.

Change 12: “Emergency Worker Exposure Control Plans” and “ALARA” Definitions

The definitions for “emergency worker exposure control plans” and “ALARA” were added to the Glossary of the RPM.

An emergency worker exposure control plan demonstrates that OROs have the capability to assess and control the radiation exposure received by emergency workers. Organizations should include in their plans the methods or options for the following: DRD and permanent record dosimetry (PRD) and reading of direct-reading dosimetry by emergency workers.

In addition, the plans should include the organizations’ methods for maintaining a radiation dose record and establishing a decision chain or authorization procedure for emergency workers to incur radiation exposures in excess of the protective action guides (PAGs). The emergency worker exposure control plan should also describe the OROs’ capability to provide KI for emergency workers, while always applying the procedure of ALARA.

The philosophy of “as low as reasonably achievable,” or ALARA, is followed to achieve making every reasonable effort to maintain exposures to ionizing radiation as far as below the dose limits as practical. ALARA is a practice to ensure consistency with the purpose for which the licensed activity is undertaken.

Explanation

The definition for “emergency worker exposure control plan” was added to the RPM to provide a clear outline to what the plans should entail. Guidance in Evaluation Criterion K.3.a, requires methods or options for emergency worker exposure control, though former language in the RPM did not thoroughly provide information on what should be included in the plan. The language added to Evaluation Criterion K.3.a formalizes elements that OROs are already doing as an emergency worker exposure control plan.

In addition, the term “ALARA” was updated in the RPM’s Glossary because the previous version did not provide a descriptive definition of the term.

Change 13: “Reentry” Definition

The definition for “reentry” was updated in the RPM to match the US Environmental Protection Agency’s (EPA’s) 2013 Draft PAG Manual for Interim Use and Public Comment. The updated definition states that reentry occurs when workers or members of the public go into a restricted zone on a temporary basis under controlled conditions.

Explanation

The definition for “reentry” was updated because the language in the RPM did not accurately define the term. The updated definition now explains that reentry is a temporary action.

Change 14: “Combined License” and “Early Site Permit” Definitions

The definitions for “combined license” and “early site permit” were added to the Glossary.

A combined license is a joint construction permit and operating license with conditions for a nuclear power facility issued under Subpart C of 10 CFR Part 52.

An early site permit is a permit through which the Nuclear Regulatory Commission (NRC) resolves site safety, environmental protection, and emergency preparedness issues. This permit is used by the NRC in order to approve one or more proposed sites for a nuclear power facility, independent of a specific nuclear plant design or an application for a construction permit or combined operating license.

Explanation

The definitions for “combined license” and “early site permit” were added because they were not previously included in the Glossary.

Change 15: Planning Standards and NUREG-0654/FEMA-REP-1 Language

Planning Standard and NUREG-0654/FEMA-REP-1 references were revised to ensure clarity and accuracy.

Explanation

The references to the Planning Standards and NUREG-0654/FEMA-REP-1 were revised to clarify the relationship that exists between the Planning Standards and NUREG-0654/FEMA-REP-1. These revisions were also made to ensure that the differences between regulatory language and guidance was more evident.

Change 16: Formatting Revisions/Technical Edits

General formatting changes were made, language on Tribal governments was added to the RPM, and technical edits were implemented, the numbering of the footnotes was updated, and blank pages were added throughout the document.

Explanation

Formatting changes and technical edits to the RPM were implemented to provide clarification and to ensure that the RPM is easily read. Language on Tribal governments was added to align the RPM with current FEMA policies.

Additionally, non-sequential page numbers and footnotes were reordered and blank pages were inserted to organize the sections so that they appear on the right-hand side of the document.