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Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request to extend comment period					
request to extend comment period	FEMA-2008-0022-0004-001	Nuclear Energy Institute, Alan Nelson	NEI respectfully requests that the NRC and FEMA extend the public comment period on the emergency preparedness rulemaking and the related guidance, from 75 to 150 days, which would make public comments due on or around October 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0005-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The proposed changes will have a significant impact on State, County and Local governments and more time is needed to consider the impacts of these changes. I am requesting that the comment period be extended to 180 days.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0006-001	Michael Lee Smith	The proposed changes will have a significant impact on State, County and Local governments and more time is needed to consider the impacts of these changes. I am requesting that the comment period be extended to 180 days.	Accepted	FEMA extended the comment period through October 19, 2009.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request to extend comment period	FEMA-2008-0022-0007-001	Washington State Department of Agriculture, James Wood	The proposed changes will have a significant impact on State, County and Local governments and more time is needed to consider the impacts of these changes. I am requesting that the comment period be extended to 180 days.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0008-001	State of Tennessee Division of Radiological Health, Bruce House	The proposed changes will have a significant impact on State, County and Local governments and more time is needed to consider the impacts of these changes. The State of Tennessee/Division of Radiological Health is requesting that the comment period be extended to 180 days.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0009-001	PA DEP Bureau of Radiation Protection, Marty Vyenielo	Due to the time required for State and Local agencies to review, digest and comment on the REP Program manual which is 366 pages, the comment period should be extended from 75 days to at least 150 days. This will allow for more comprehensive review and significantly better quality comments which is what FEMA is looking for to improve the overall quality of the REP program.	Modified	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0010-001	Minnesota Homeland Security Emergency Management, Robert Hines	The proposed changes will have a significant impact on State, County and Local governments and more time is needed to consider the impacts of these changes. I am requesting that the comment period be extended to 180 days.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0011-001	Nebraska Emergency Management Agency, Jonathan Schwartz	NEMA not only concurs with the contents of the NEI letter but strongly endorses the request for an extension of the comment period from 75 to 150 days.	Modified	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0013-001	Duke Energy, John Pitesa	Based on the amount of the published material concerning the proposed emergency planning rule, Duke is hereby fully endorsing the request made by the Nuclear Energy Institute by letter dated May 18, 2009, for an extension of time for public comments from 75 days to 150 days.	Modified	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0014-001	Washington Emergency Management Division, James Mullen	Washington State requests that the NRC and FEMA extend the public comment period on the emergency preparedness rulemaking guidance from 75 days to 180 days, which would make public comments due on or around November 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request to extend comment period	FEMA-2008-0022-0015-001	North Carolina Division of Emergency Management, Stephen Payne	The additional requirement for implementation of Homeland Security Exercise Evaluation Program (HSEEP) and National Incident Management System (NIMS) on the REP Program will have a significant impact and will take several weeks to identify the cost for compliance with the new requirements.	Noted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0015-002	North Carolina Division of Emergency Management, Stephen Payne	The proposed changes will have a significant impact on State, County and Local governments and the additional time is necessary to consider the impacts of these changes.	Noted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0015-003	North Carolina Division of Emergency Management, Stephen Payne	The state of North Carolina respectfully requests that the NRC and FEMA extend the public comment period on the emergency preparedness rulemaking and the related guidance, NRC document number NRC2008-0122 and FEMA document FEMA-2008-0022, from 75 to 180 days. Public comments will be due on or about November 12, 2009 with this extension. This request also mirrors the Nuclear Energy Institute (NEI) May 18, 2009 request for comment period extension.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0025-001	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	The Conference of Radiation Control Program Directors, Inc. respectfully requests that the NRC and FEMA extend the comment period for this important rulemaking and the related guidance to 150 days from publication. We believe that the 75 days provided in the Federal Register Notice is not adequate for stakeholders to properly review the significance of the impacts on state and local programs. The reasons for this request are outlined below.	Modified	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0026-001	State of Missouri Emergency Management Agency, Paul Parmenter	The State Emergency Management Agency, in support of Callaway Unit One and Cooper Nuclear Station, would ask that the public comment period be extended to October 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0027-001	NEMAHA County Emergency Management Agency, Robert Cole	As a local official directly affected by this process I respectfully request the public comment period on the rulemaking be extended from 75 to 150 days, which would make the public comments due on or about October 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request to extend comment period	FEMA-2008-0022-0028-001	Ohio Emergency Management Agency, Nancy Dragani	In order to adequately evaluate the proposed documents and develop a comprehensive list of comments I hereby request the proposed rulemaking public comment period be extended to 180 days for both documents.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0029-001	Kansas Department of Health and Environment, Thomas Conley	The proposed rulemaking will have significant impacts on state and local programs and as such the 75 days provided in the Federal Register Notice is not adequate for stakeholders to properly review the significance of these impacts on state and local programs.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0030-001	Tennessee Valley Authority, Fred Mashburn	TVA has reviewed and endorses NEI's request that the comment period for this important rulemaking and related guidance be extended until approximately October 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0031-001	Commonwealth of Virginia, Michael Cline	VDEM respectfully requests that the NRC and FEMA extend the public comment period on the emergency preparedness rulemaking and the related guidance, from 75 to 150 days, which would make public comments due on or around October 16, 2009.	Accepted	FEMA extended the comment period through October 19, 2009.
request to extend comment period	FEMA-2008-0022-0037-001	Nebraska Emergency Management Agency, Al Berndt	WHEREAS the "red-lined" version still has not been posted on the "regulations.gov" website as of the date of this letter at 9:00 A.M. CDST, and that even if it were posted, the time remaining to review and make comments is now less than the original comment period May 18 - 3 August 2009, The State of Nebraska is requesting a minimum of an additional 60 day extension to review and comment on the "red-lined" version of the new REP Manual.	Noted	FEMA extended the comment period through October 19, 2009.
general comments					
general comments	FEMA-2008-0022-0103-002	Strategic Teaming and Resource Sharing (STARS), Carl Corbin	The Strategic Teaming and Resource Sharing (STARS) (STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.) alliance appreciates this opportunity to submit the attached comments associated with the proposed Emergency Preparedness rulemaking (Ref. 1) and the associated documents (Ref. 2 through 5). STARS endorses the comments submitted separately by the Nuclear Energy Institute (NEI). Additional STARS specific comments are provided in the enclosure to this letter.	Noted	The FEMA Public Comment Adjudication Committee notes that STARS submitted lengthy comments on FEMA's docket. The REP Program Manual is guidance for offsite response organizations. Other than the two comments addressed individually in this document (FEMA-2008-0022-0103 -2 and FEMA-2008-0022-0103 -3), STARS' comments are directed to NRC documents and licensee responsibilities, and are thus outside the scope of the REP Program Manual. FEMA has shared STARS' comments with the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0116-015	Nuclear Energy Institute, Alex Marion	During the course of NEI's review, it became apparent that the implementing guidance contained in the ISG and NUREG-0654, Supplement 4 is not aligned with the associated rulemaking discussion presented in SECY-09-0007. Specifically, the implementing guidance introduces requirements and expectations that go beyond the stated intent of the rule change, and their basis is unclear. The implementing guidance should be carefully reviewed to ensure that it does not introduce unnecessary or unwarranted requirements, or is otherwise more restrictive than the basis in SECY-09-0007.	Noted	This comment is directed to regulations and guidance for licensees. FEMA has shared this comment with the NRC for situational awareness.
general comments	FEMA-2008-0022-0093-032	Texas Department of State Health Services, Bob Free	GM-8, Rev. 1: Remove from Appendix C, Add to Appendix D as retired guidance. Guidance Memorandum 8, Revision 1 should be retired from the REP Program. Coordination between Regional Advisory Committee and Utilities is addressed in 44 CFR Part 350 and FEMA REP-1. The last statement in GM-8 states that "the post-exercise draft evaluation/critique reports (After Action Reports) should not be furnished to the utility involved". This guidance is out-dated and conflicts with HSEEP and NIMS. HSEEP requires the Draft After Action Report to be provided to all exercise planning team members. The utilities are inseparable from the development and completion of the exercise. They must be included in the review and comment on draft after action reports. An NRC representative could be added to the exercise planning team to avoid concerns about conflict of interest.	Rejected	GM-8 will not be retired because it applies to the FEMA RAC only. The utilities are inseparable from the development and completion of the exercise. FEMA is prohibited from certain direct communications with the utility involved to avoid conflict of interest. However, States may share the draft AAR and other exercise information with the utility. FEMA will maintain constant dialog and communication throughout the implementation of the new guidance in the REP Program Manual.
general comments	FEMA-2008-0022-0106-027	Nebraska Emergency Management Agency, Jonathan Schwarz	Nuclear Power Stations are receiving no benefit for paying the annual bills of the FEMA REP Program without the capability to directly dialogue in two-way conversation due to GM # 8. GM # 8 should be deleted as a reference in the FEMA REP Manual.	Rejected	GM-8 will not be retired because it applies to the FEMA RAC only. The utilities are inseparable from the development and completion of the exercise. FEMA is prohibited from certain direct communications with the utility involved to avoid conflict of interest. However, States may share the draft AAR and other exercise information with the utility. FEMA will maintain constant dialog and communication throughout the implementation of the new guidance in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0106-040	Nebraska Emergency Management Agency, Jonathan Schwarz	When NRC\FEMA Teams came out to the Regions during 2008 it appeared there was an agenda to be had and really no interest in seeking input for overall changes to the REP program, and specifically to the REP Manual. From the review of the REP Manual, not one single recommendation provided from Region VII stakeholders was included & not one single idea as to what NRC\FEMA wanted to incorporate, was deleted.Potential Impact: Has created suspicion and animosity as to motives of NRC and FEMA and leads to less cooperation and tendency to question every future move of NRC and FEMA no matter how honest such moves may be. It will be very suriprising if any of the public comments and recommendations concerning this Revision of the REP Manual will be taken to heart by NRC/FEMA and actually implemented.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Information gathered at stakeholder meetings is given fair consideration. In addition, the Public Comment Adjudication Team fairly and equitably adjudicated over 2,000 comments on the draft REP Program Manual and Supplement 4. 80% of the comments that were directly applicable to material in the REP Program Manual were accepted and incorporated into revisions to the draft documents. Please see the executive summary document for more information on the dispositions of comments received during the comment period. FEMA is continuing the process of soliciting stakeholder feedback. OROs around the country are in different stages of adopting NIMS. All Federal agencies, including FEMA, have been directed to adopt NIMS and utilize HSEEP as their exercise methodology. The REP Program Manual's intent is to remain flexible while providing guidance to stakeholders on how to meet requirements.
general comments	FEMA-2008-0022-0121-007	Utility Radiological Safety Board of Ohio, Nancy Dragani	There are many sections within this guidance that require too specific detail and/or excessive information that is unnecessary and cumbersome to the state and counties with out any identifiable benefit. The amount of detail may require additional plan updates in addition to annual revisions making finalization of the plan almost impossible. The state and counties may be encumbered in their response by too many specific details in their plans/procedures.	Noted	FEMA needs to see enough procedural detail to verify that the intent of NUREG-0654/FEMA-REP-1 is being met.
general comments	FEMA-2008-0022-0093-003	Texas Department of State Health Services, Bob Free	Three pilot exercises are scheduled for FY 2010 to test HSEEP incorporation. We feel this is the appropriate research to be conducted before adopting REP Guidance. If the REP guidance manual is finalized before evaluating and incorporating the results of these pilots, we are concerned that it will lead to new Guidance Memoranda or something similar; a situation that promulgation of this new REP Guidance is supposed to avoid.	Noted	The REP Program is constantly evolving, as is the REP Program Manual. Every effort is being made to incorporate the most current information possible into this revision. In addition, the REP Program Manual is scheduled for periodic review to incorporate new guidance and policies. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
general comments	FEMA-2008-0022-0108-011	Louisiana Department of Environmental Quality, Cheryl Chubb	When is it expected for the NESC to have finalized & mature into something that will be utilized with the REPR program. Will there be outreach prior to its implementation? What Federal involvement (i.e., agencies, levels of performance, etc) should we expect? Will there be an outreach in concert with the NESC debut?	Noted	The NESC is still under development. Future Federal involvement has not yet been determined.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0108-013	Louisiana Department of Environmental Quality, Cheryl Chubb	OSHA has a database which one can search by topic to see official interpretations into their regulations. Will FEMA include a database so that the entire community can research/review the "uniform interpretation?" Or will these interpretations be sent out to the entire community?	Noted	The REP Program Manual's purpose is to provide uniform interpretation of REP guidance. The final publication will include a searchable electronic version.
general comments	FEMA-2008-0022-0040-001	Kathy Hougen	Nuclear utlities should not have governing authority over state and local governments. FEMA could work more closely with nuclear utilities instead of placing regulatory compliance on nuclear utlities	Noted	Although nuclear utilities coordinate with offsite response organizations, nuclear utilities do not have any governing authority over State and local governments. Pursuant to presidential directive, NRC is responsible for regulating nuclear utilities, whereas FEMA has lead oversight of the offsite radiological emergency response activities of State and local governments. FEMA continues to work very closely with the NRC on onsite rulemaking and offsite guidance to ensure clear delineation of authorities and reasonable responsibilities between FEMA, NRC, utilities, and offsite response organizations.
general comments	FEMA-2008-0022-0101-011	Florida Division of Emergency Management, Michael Younger	As additional CPG series documents are developed thathave an impact on radiological emergency preparedness, such as CPG 302 (that is not currently available in a citable form), they should be made available for comment as well.	Noted	This comment is beyond the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. The initial draft of CPG 302 is available for comment. After it is finalized, information from CPG 302 that impacts REP will be incorporated into the REP Program Manual as appropriate.
general comments	FEMA-2008-0022-0101-006	Florida Division of Emergency Management, Michael Younger	The RPM needs to focus on those aspects of the REPprogram that are not already addressed in the NRF and supporting documents as those documents may be updated independently of the RPM.	Noted	One purpose of the REP Program Manual is to serve as a one-stop guidance document for implementation of the REP program. The effort is being made to only include the most essential information from other documents as they apply specifically to the REP program.
general comments	FEMA-2008-0022-0127-001	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	We find that it attempts, in many minute instances to extend the reach of the RERP evaluation process beyond the intent of the RERP program and in fact beyond All Hazard norms. Examples used in the draft to illustrate points are unrealistic, clumsy and monochromatic, they tend to over simplify the issue they attempt to illustrate while alluding to some nebulous recommendation which will likely evolve into ersatz new requirements. In reviewing the draft document we have developed a sense that the approach used in its revision tends to facilitate an inflexible evaluation process rather than provide well founded guidance that will facilitate innovative capability enhancement.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0111-005	Illinois Emergency Management Agency, Andrew Velasquez	This revision goes beyond a reasonable level of detail. The document, however unintentionally, suggests that there are limits beyond which plans are not expected to go in addressing issues relative to public health and safety. The OROs should determine the extent of the plans. The guidance could be interpreted to set maximum as well as minimum requirements, thus discouraging innovation and alternate approaches that FEMA may not have envisioned or anticipated. Thus, the planning guidance as written does not ensure emergency plans remain dynamic in nature or flexible enough to adapt to ever-changing circumstances.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The guidance includes provisions for alternative methods and encourages innovation.
general comments	FEMA-2008-0022-0111-006	Illinois Emergency Management Agency, Andrew Velasquez	FEMA, in choosing a limiting interpretative approach to NUREG-0654/FEMA-REP-I, Rev. 1 planning standards when evaluating written plans while professing at the same time to move toward a performance-based evaluation methodology for REP exercises under the Strategic Review initiative, is contradictory. By urging the adoption of strictly worded plans and procedures and allowing little if any room for interpretation, FEMA discourages a key goal of the Strategic Review initiative, i.e., the implementation of the planning objective through prudent and thoughtful decision-making.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The guidance includes provisions for alternative methods and encourages innovation.
general comments	FEMA-2008-0022-0044-020	Alliance For A Clean Environment , Lewis Cuthbert	People must be given immediate notification of any radiation accident or terrorist attack to have the opportunity to take immediate action to avoid exposure to the degree possible.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA has provided this comment to the NRC for situational awareness.
general comments	FEMA-2008-0022-0044-004	Alliance For A Clean Environment , Lewis Cuthbert	Immediately notify the public of any radiation release due to an accident or attack.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA has provided this comment to the NRC for situational awareness.
general comments	FEMA-2008-0022-0044-005	Alliance For A Clean Environment , Lewis Cuthbert	Pay substantial fines for failure to provide immediate notification of any accident or attack, regardless of the levels or amounts of each radionuclide released.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA has provided this comment to the NRC for situational awareness.
general comments	FEMA-2008-0022-0106-043	Nebraska Emergency Management Agency, Jonathan Schwarz	In a real event, notifying the public is going to take as long as our political leaders decide its going to take. In a real event, people are going to get their information from their favorite news source(s) and not rely on on single radio station, no matter what an EAS message says.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0126-012a	Pilgrim Watch, Mary Lampert	Recognizing that when the electrical grid fails due to adverse weather or mechanical failure all too often emergency notification systems around nuclear power stations simultaneously lose all power. Electrical grid failure is potentially an initiating event for a nuclear accident and potentially the opening of an attack by terrorists on a reactor. On February 23, 2005 the Nuclear Information Resource Service (NIRS) in coalition with 16 organizations and several county governments petitioned the NRC to take emergency enforcement action to require nuclear power station operators to provide emergency backup power sources, preferably through photovoltaic panels, for emergency notification siren systems nationwide. NRC denied the petition, May 18, 2005. In NRC's denial, NIRS learned the following: In the event of a nuclear accident or an act of terrorism at a U.S. nuclear power station simultaneously occurring with an electrical grid failure, only 27% of the nation's 62 nuclear reactor Emergency Planning Zones using public notification siren systems are prepared to fully operate their emergency sirens independent of the main power lines; 40% of the nation's siren systems are entirely reliant upon	Noted	Backup power alone is not sufficient for providing a backup for the ANS. NUREG-0654/FEMA-REP-1 Supplement 4 includes a new requirement for backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See NUREG-0654/FEMA-REP-1 Supplement 4, Part E.2 - Backup Means of Alert and Notification Systems, Summary of Changes.
general comments	FEMA-2008-0022-0126-012b	Pilgrim Watch, Mary Lampert	(continued)electricity from the grid; three emergency planning zones do not utilize sirens but rather distributed tone alert boxes; some (more than half) but not all of the sites without backup power are implementing or plan to implement siren upgrades - thus, approximately two thirds of the sites will have backup power to all their sirens following completion of the currently planned siren upgrades. A list of siren failures is attached, see Attachment ANRC's denial said that other possible longer term improvements to the public alert and notification systems for nuclear power plants would be more appropriately addressed by other processes, such as revising FEMA-REP-10. The proposed draft is not a satisfactory response.		
general comments	FEMA-2008-0022-0126-010	Pilgrim Watch, Mary Lampert	The excuse that we do not have to prepare for the "worst case" cannot be taken to mean that we simply have to prepare for the "best case;" nor can the excuse be made bad accidents cannot happen. Emergency planning, on its face, assumes accidents can and do happen and therefore it is necessary to prepare and train.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
general comments	FEMA-2008-0022-0106-041	Nebraska Emergency Management Agency, Jonathan Schwarz	It will be very suriprising if any of the public comments and recommendations concerning this Revision of the REP Manual will be taken to heart by NRC/FEMA and actually implemented.	Noted	FEMA received over 2400 comments, of which approximately 1600 contained substantive suggestions for revision to the REP Program Manual. FEMA either partially or completely accepted 80% of the substantive comments.
general comments	FEMA-2008-0022-0121-008	Utility Radiological Safety Board of Ohio, Nancy Dragani	Currently and in the past, it has occurred on several occasions that the re were conflicting interpretations and/or enforcement actions between FEMA regions and FEMA Headquarters. These conflicts have caused extreme difficulty for the State of Ohio because the state coordinates regulatory activities with two FEMA regions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. This is a local matter and would need to be discussed with the parties involved.
general comments	FEMA-2008-0022-0020-052	Ashtabula County EMA, George Rolland	And is the 10 Decibel requirement above ambient noise to be mean sirens should be heard inside?	Noted	Answer: No. Ambient noise refers to the sound levels outside.
general comments	FEMA-2008-0022-0101-110	Florida Division of Emergency Management, Michael Younger	Consideration should also be given to include language recommending that the non-evaluated off year exercises be critiqued by licensee and ORO personnel.	Noted	OROs determine whether to critique non-evaluated exercises.
general comments	FEMA-2008-0022-0108-236	Louisiana Department of Environmental Quality, Cheryl Chubb	FEMA's plan review noted each LOA requirement and wrote planning issues in regards to each criterion, even though some were duplicate requirements of different criterion.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power					
concerns about nuclear power	FEMA-2008-0022-0022-001	Stone Crab Alliance, John Dwyer	The problem with spent rods is that the radiation it emits is colorless, invisible, odor-less, tasteless--undetectable unless you've got your own Geiger counter. So we gullible American citizens don't believe it's there. We don't believe it's deadly. Because our President and our government tells us so. But depleted uranium doesn't deplete very much. "Spent" fuel rods are not altogether cashed out. Plutonium-239 only lasts 24,100 years. And Plutonium 244 only lasts 80 million years. Uranium is cheaper than recycling because we mine it on "Indian" reservations and leave the radioactive tailings at the site of the mines. "Indians" don't complain. News pundits claim that "nuclear energy keeps us from burning coal and oil." A bald-faced lie.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0022-002	Stone Crab Alliance, John Dwyer	In fact, the nuclear fuel cycle utilizes large quantities of fossil fuel at all of its stages--the mining and milling of uranium, the construction of the nuclear reactor and cooling towers, robotic decommissioning of the intensely radioactive reactor at the end of its 20 to 40-year operating lifetime, and transportation and long-term storage of massive quantities of radioactive waste. In summary, nuclear power produces, according to a 2004 study by Jan Willem Storm van Leeuwen and Philip Smith, only three times fewer greenhouse gases than modern natural-gas power stations.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0022-003	Stone Crab Alliance, John Dwyer	Nuclear reactors consistently release millions of curies of radioactive isotopes into the air and water each year. These releases are unregulated because the nuclear industry considers these particular radioactive elements to be biologically inconsequential. This is not so. These unregulated isotopes include the noble gases krypton, xenon and argon, which are fat-soluble and if inhaled by persons living near a nuclear reactor, are absorbed through the lungs, migrating to the fatty tissues of the body, including the abdominal fat pad and upper thighs, near the reproductive organs. These radioactive elements, which emit high-energy gamma radiation, can mutate the genes in the eggs and sperm and cause genetic disease. Tritium, another biologically significant gas, is also routinely emitted from nuclear reactors. Tritium is composed of three atoms of hydrogen, which combine with oxygen, forming radioactive water, which is absorbed through the skin, lungs and digestive system. It is incorporated into the DNA molecule, where it is mutagenic.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0022-004a	Stone Crab Alliance, John Dwyer	The dire subject of massive quantities of radioactive waste accruing at the 442 nuclear reactors across the world is also rarely, if ever, addressed by the nuclear industry. Each typical 1000-megawatt nuclear reactor manufactures 33 tons of thermally hot, intensely radioactive waste per year. Telling us that radioactive waste stored in silicone logs, that rods in the concrete-reinforced swimming pools on site, and that nuclear power plants are "safe and secure" are also a lies. Iodine 131, which was released at the nuclear accidents at Sellafield in Britain, Chernobyl in Ukraine and Three Mile Island in the US, is radioactive for only six weeks and it bio-concentrates in leafy vegetables and milk. When it enters the human body via the gut and the lung, it migrates to the thyroid gland in the neck, where it can later induce thyroid cancer. In Belarus more than 2000 children have had their thyroids removed for thyroid cancer, a situation never before recorded in pediatric literature. Strontium 90 lasts for 600 years. As a calcium analogue, it concentrates in cow and goat milk. It accumulates in the human breast during lactation, and in bone, where it	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0022-004b	Stone Crab Alliance, John Dwyer	(continued)can later induce breast cancer, bone cancer and leukemia. Cesium 137, which also lasts for 600 years, concentrates in the food chain, particularly meat. On entering the human body, it locates in muscle, where it can induce a malignant muscle cancer called a sarcoma. Plutonium 239, one of the most dangerous elements known to humans, is so toxic that one-millionth of a gram is carcinogenic. More than 200kg is made annually in each 1000-megawatt nuclear power plant. Plutonium is handled like iron in the body, and is therefore stored in the liver, where it causes liver cancer, and in the bone, where it can induce bone cancer and blood malignancies. On inhalation it causes lung cancer. It also crosses the placenta, where, like the drug thalidomide, it can cause severe congenital deformities. Plutonium has a predisposition for the testicle, where it can cause testicular cancer and induce genetic diseases in future generations. Plutonium lasts for 500,000 years, living on to induce cancer and genetic diseases in future generations of plants, animals and humans.		
concerns about nuclear power	FEMA-2008-0022-0022-005	Stone Crab Alliance, John Dwyer	Plutonium is also the fuel for nuclear weapons -- only 5kg is necessary to make a bomb and each reactor makes more than 200kg per year. Therefore any country with a nuclear power plant can theoretically manufacture 40 bombs a year.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0044-001	Alliance For A Clean Environment , Lewis Cuthbert	Based on our 8-year investigation, we do not believe the proposed emergency plan deals realistically or comprehensively with all harmful health impacts to the public from radiation poisoning due to a nuclear power plant accident or terrorist attack. We believe harmful health impacts could be minimized with improved up-front realistic emergency planning and stricter enforcement of regulations that already exist..	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA has provided this comment to the NRC for situational awareness. The REP Program guidance has established radiological emergency response capabilities that are regularly exercised. State and local governments have used these plans as a basis to respond successfully to other events impacting their communities.
concerns about nuclear power	FEMA-2008-0022-0044-018	Alliance For A Clean Environment , Lewis Cuthbert	Full and accurate disclosure on the health harm from radiation exposure due to nuclear power plant emissions is imperative. To make the most protective decisions and take precautionary action for their families, people need to be told the truth about radiation's harmful health impacts and they must be notified immediately after a nuclear power plant accident or attack - not days, hours, or even 15 minutes later. Many reputable scientists (based on their research) believe there is no safe dose of radiation exposure - that there is no threshold for radiation damage to humans – no dose which is harmless. Every minute the nuclear industry waits to notify the public is time lost in attempting to prevent unnecessary radiation poisoning.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-002	Alliance For A Clean Environment , Lewis Cuthbert	vast numbers of people did not understand the radiation health threats and impacts from a nuclear power plant accident or attack. Therefore, they were not taking personal emergency planning seriously. Most were totally unprepared and had no idea what to do to protect their families, including which roads they were to take during evacuation or where they should go.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-024	Alliance For A Clean Environment , Lewis Cuthbert	The nuclear industry had leaks which went unreported and/or were only reported after the leak was corrected.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-025	Alliance For A Clean Environment , Lewis Cuthbert	At Limerick for example, we identified accidents or releases of radiation above their routine releases, when Exelon waited far too long to inform the newspaper. It was far too late for parents or pregnant women to attempt to avoid exposure.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-026	Alliance For A Clean Environment , Lewis Cuthbert	The big mistake at TMI. It was days before the pubic was notified. People were unnecessarily exposed to increased amounts of radiation for days when they could have made a decision to leave the area to better protect their families..	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0044-003	Alliance For A Clean Environment , Lewis Cuthbert	First and foremost, people within 50 miles of nuclear plants need better access to education about radiation exposure risks, with full and accurate disclosure about the harmful health impacts from all the types of radiation that would be released in a nuclear plant disaster.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-030	Alliance For A Clean Environment , Lewis Cuthbert	Facts suggest nuclear power plants are a clear and present danger - that each reactor is a potential Chernobyl. It is illogical for the nuclear industry or NRC to continue to falsely claim that a meltdown is highly unlikely.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-031	Alliance For A Clean Environment , Lewis Cuthbert	Nuclear Plants Are Still Vulnerable To Terrorist Attacks By Plane or Missile.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-032	Alliance For A Clean Environment , Lewis Cuthbert	Handing out KI pills leads people to believe they are protected, when in reality KI pills protect against only one type of radiation. A false sense of protection can lead to decisions that could unnecessarily further jeopardize people. To best protect the public, they need to be better educated about how to best protect their families from all types of radionuclides that could be released in a nuclear disaster. It should be clearly explained that KI pills protect people from just one of the radionuclides that would be released during a nuclear power plant accident or attack.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-033	Alliance For A Clean Environment , Lewis Cuthbert	There are not nearly enough shelters planned for heavily populated regions such as the one around Limerick and shelters aren't planned far enough away from the nuclear plant.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-007	Alliance For A Clean Environment , Lewis Cuthbert	Guard against air strikes, missile attacks, and a larger number of terrorists	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-009	Alliance For A Clean Environment , Lewis Cuthbert	Remove all on-line aerial views of nuclear power plants.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0080-040a	Douglas Fleck	Finally, during the National Radiological Emergency Preparedness (NREP) Conference held in Harrisburg in 2004, the NRC and FEMA received feedback from the states and municipalities in attendance. The general consensus from the attendees was that we did not want to see a whole new chapter written into the REP program because of possible terrorist threats. We felt that it really didn't matter what caused the problem in the plant – what mattered was what we did outside of the fence to protect the public. Our actions, with some minor modifications for the immediate safety of people living in very close proximity to the plant, would be precisely what our plans called for and what we have trained for. Quite obviously our feedback fell on deaf ears. The tortuously drawn out Comprehensive Review Program merely pointed out what we already new outside of the fence – that we would have to plan for possible new commitments for local emergency response units and that these units may need outside support in order to meet their pre-designated requirements delineated in off-site plans. While this presents challenges it is not particularly new territory. In fact this juggling and economical	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The purpose of the regional or stakeholder meetings was to engage with interested stakeholders and share information regarding the REP Program Manual and Supplement 4 revisions, their purpose, and intent. Discussion of issues was conducted during these informational meetings; however, all stakeholders were required and encouraged to submit their formal comments via Regulations.gov (public record) for full consideration into the adjudication and finalization process of these proposed documents. OROs around the country are in different stages of adopting NIMS. All Federal agencies, including FEMA, have been directed to adopt NIMS and utilize HSEEP as their exercise methodology. The REP Program Manual's intent is to remain flexible while providing guidance to stakeholders on how to meet regulatory requirements.
concerns about nuclear power	FEMA-2008-0022-0080-040b	Douglas Fleck	use of scarce resources is the very essence of emergency management. This is what local emergency management agencies exist to do and they get plenty of practice at it. If everything was already in place to immediately correct an event it simply would not be an emergency. As stated earlier NIMS has already provided the means to stimulate assistance between governmental agencies. The Department of Homeland Security has poured enormous amounts of money into making this a workable system that is already in place. There is nothing unique about a terrorist incident at a nuclear power plant that should require a separate set of decrees from the federal government concerning how local emergency management agencies will respond to such an incident. The present system in place for security incidents worked. There really was not a need on the off-site side for modifications of this scope.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0080a-039a	Pennsylvania Emergency Management Agency, Douglas Fleck	Finally, during the National Radiological Emergency Preparedness (NREP) Conference held in Harrisburg in 2004, the NRC and FEMA received feedback from the states and municipalities in attendance. The general consensus from the attendees was that we did not want to see a whole new chapter written into the REP program because of possible terrorist threats. We felt that it really didn't matter what caused the problem in the plant – what mattered was what we did outside of the fence to protect the public. Our actions, with some minor modifications for the immediate safety of people living in very close proximity to the plant, would be precisely what our plans called for and what we have trained for. Quite obviously our feedback fell on deaf ears. The tortuously drawn out Comprehensive Review Program merely pointed out what we already new outside of the fence – that we would have to plan for possible new commitments for local emergency response units and that these units may need outside support in order to meet their pre-designated requirements delineated in off-site plans. While this presents challenges it is not particularly new territory. In fact this juggling and economical	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The purpose of the regional or stakeholder meetings was to engage with interested stakeholders and share information regarding the REP Program Manual and Supplement 4 revisions, their purpose, and intent. Discussion of issues was conducted during these informational meetings; however, all stakeholders were required and encouraged to submit their formal comments via Regulations.gov (public record) for full consideration into the adjudication and finalization process of these proposed documents. OROs around the country are in different stages of adopting NIMS. All Federal agencies, including FEMA, have been directed to adopt NIMS and utilize HSEEP as their exercise methodology. The REP Program Manual's intent is to remain flexible while providing guidance to stakeholders on how to meet regulatory requirements.
concerns about nuclear power	FEMA-2008-0022-0080a-039b	Pennsylvania Emergency Management Agency, Douglas Fleck	(continued) use of scarce resources is the very essence of emergency management. This is what local emergency management agencies exist to do and they get plenty of practice at it. If everything was already in place to immediately correct an event it simply would not be an emergency. As stated earlier NIMS has already provided the means to stimulate assistance between governmental agencies. The Department of Homeland Security has poured enormous amounts of money into making this a workable system that is already in place. There is nothing unique about a terrorist incident at a nuclear power plant that should require a separate set of decrees from the federal government concerning how local emergency management agencies will respond to such an incident. The present system in place for security incidents worked. There really was not a need on the off-site side for modifications of this scope.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0124-002	Three Mile Island Alert, Scott Portzline	Every Homeland Security response drill has shown that telephone service is notreliable during an emergency. Therefore, licensees should have at least three satellitetelephones. The NRC rejected our proposal for requiring satellite phones as a solution.They spuriously argued that this rule would require "updating every time a newtechnology becomes available." (NRC Power Reactor Security Requirements Integrated Comment Responses p. 117-118, (enclosure 3 of SECY-08-0099) http://www.nrc.gov/reading-rm/doc-collections/commission/secys/2008/secy2008-0099/enclosure3.pdf)	Noted	The comment is directed to licensees. FEMA has provided this comment to the NRC for situational awareness.
concerns about nuclear power	FEMA-2008-0022-0044-028	Alliance For A Clean Environment , Lewis Cuthbert	Better education is essential, on how to shelter in place to best protect people from all the kinds of radiation that would be released in a nuclear power plant accident or attack. Starting with the truth about the actual risk from radiation exposure, we believe NRC has a responsibility to do far more comprehensive education in how to shelter in place to protect families from all the kinds of radiation that would be released during a disaster.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-006	Alliance For A Clean Environment , Lewis Cuthbert	Provide funding for independent public education in regions around nuclear plants on: Radiation health impacts related to all types of radionclides released from nuclear power plants, with full and accurate disclosure to promote immediate evacuation, with special classes on impacts to fetuses and children. Educate the public in self-treatment for radiation poisoning since there would not be enough hospitals or other places to get treatment. Provide well advertised full disclosure programming at least once a year focusing on detailed evacuation emergency plans (including why, where, and how), on all TV and radio stations within 50 miles of each nuclear plant. Teach the most protective sheltering in place procedures to guard against all radionuclides potentially released. Provide comprehensive checklists to all residents in the region, including all supplies essential to prepare for evacuation and/or sheltering	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA has provided this comment to the NRC for situational awareness.
concerns about nuclear power	FEMA-2008-0022-0044-011	Alliance For A Clean Environment , Lewis Cuthbert	Pay the cost for evacuation plans for pre-school and day-care centers	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-012	Alliance For A Clean Environment , Lewis Cuthbert	Pay for additional vehicles and drivers to complete immediate transport of all students from every school district in the EPZ at one time.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
concerns about nuclear power	FEMA-2008-0022-0044-027	Alliance For A Clean Environment , Lewis Cuthbert	The Emergency Evacuation Plan is unrealistic and unworkable in heavily populated regions such as the region around Limerick Nuclear Power Plant.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-029	Alliance For A Clean Environment , Lewis Cuthbert	Large school districts do not have enough buses or drivers to evacuate all children at one time. School bus drivers have admitted to ACE members that they will make the first run, but are unlikely to return for the second. Some questioned their ability to get their school children out during the first run due to traffic congestion.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-015	Alliance For A Clean Environment , Lewis Cuthbert	Pay to build shelters at least 50 miles away in each direction from the nuclear plant. Shelters should be built like bomb shelters, since people would be facing the same kind of radiation poisoning as with a bomb.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
concerns about nuclear power	FEMA-2008-0022-0044-016	Alliance For A Clean Environment , Lewis Cuthbert	Expand the number of public shelters to more realistically accommodate the population around each nuclear plant, including food and water supplies.	Noted	State and local governments determine the number of shelters based on actual population and historical statistics on the percentage of the population that utilized shelters during real disasters.
concerns about nuclear power	FEMA-2008-0022-0044-010	Alliance For A Clean Environment , Lewis Cuthbert	Conduct a detailed virtual evacuation exercise annually using the most current population counts and traffic studies for the region around each nuclear plant. The exercise and NRC's evaluation should be made available to the public on the NRC and FEMA websites.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. The commenter's suggestion is noted for future discussions on enhancing exercise initiatives. Evacuation time estimates are developed from actual studies and statistical data. These estimates are tested during REP exercises. The final exercise reports are available on the NRC web site.
concerns about nuclear power	FEMA-2008-0022-0044-019	Alliance For A Clean Environment , Lewis Cuthbert	A broad range of radionuclides are routinely and accidently released from nuclear power plants. That same broad range of radionuclides would be released in a disaster situation. No one can accurately determine the harmful impacts to individuals, especially fetuses, children and those already suffering from cancer and other serious illnesses. Synergistic, additive, and cumulative harmful health impacts from radiation releases are unknown. When preparing for emergencies after a nuclear disaster, the reality of the potential for harmful health impacts from radiation exposure should be the driving force in all emergency preparedness decisions.	Noted	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Adminis-trative/ formatting					
adminis-trative/ formatting	FEMA-2008-0022-0032-001	Lawrence Robertson	It would be nice to have the entire document scanned into the record. Several pages appear to be missing.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
adminis-trative/ formatting	FEMA-2008-0022-0042-002	Ned Wright	The outline is very good with "NUREG Criterion" followed by "Explanation" and concluding with what the "plans/procedures should:" expectation to be demonstrated or inspected. This format is very helpful to the practitioner. The explanation portion is very important to address the "why we are doing this" to support the NUREG Criterion while the "plans/procedures should:" layout exactly what is required to meet the NUREG Criterion. The layout of the three sections should be distinct. In some cases the part 2 and 3 seem to run together. See the difference in the layout of A.1.a (page II-4) and A.3 (Page II-13).	Accepted	The REP Program Manual has been revised so that each Planning Standard is laid out with the following elements in order: Criterion, requirements checklist, Explanation, References. See Part II.C: Planning Guidance for the updated and consistent format.
adminis-trative/ formatting	FEMA-2008-0022-0101-004	Florida Division of Emergency Management, Michael Younger	The "plans/procedures should" bullet points should be moved ahead of the explanation to provide a quick overview of the planning guidance associated with a particular criterion. The explanation section should build upon those high level planning points. At a minimum, the RPM should be formatted consistently with other FEMA guidance documents (such as use of special considerations boxes) and the explanations streamlined to delete extraneous information and hypotheticalsituations.	Accepted	The REP Program Manual has been revised so that each Planning Standard is laid out with the following elements in order: Criterion, requirements checklist, Explanation, References. See Part II.C: Planning Guidance for the updated and consistent format.
adminis-trative/ formatting	FEMA-2008-0022-0020-003	Ashtabula County EMA, George Rolland	BLANKET COMMENT - spell check the entire document. Many misspellings throughout.	Accepted	The REP Program Manual has been completely spell checked.
adminis-trative/ formatting	FEMA-2008-0022-0021-003	Geauga County DES, Dale Wedge	BLANKET COMMENT - spell check the entire document. Many misspellings throughout.	Accepted	The REP Program Manual has been completely spell checked.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
adminis-trative/ formatting	FEMA-2008-0022-0089-005	State of Tennessee Department of Environment and Conservation/ Division of Radiological Health, Bruce House	The format of the REP Manual does not support and expeditious review	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
adminis-trative/ formatting	FEMA-2008-0022-0036-003	Lake County EMA, Larry Greene	BLANKET COMMENT - spell check the entire document. Many misspellings throughout.	Accepted	The REP Program Manual has been completely spell checked.
adminis-trative/ formatting	FEMA-2008-0022-0073-003	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: Blanket comment for entire document. There are many misspellings within the document. Recommend conducting a thorough spell check to correct the errors.	Accepted	The REP Program Manual has been completely spell checked.
adminis-trative/ formatting	FEMA-2008-0022-0108-007	Louisiana Department of Environmental Quality, Cheryl Chubb	The REP Manual should be spell checked.	Accepted	The REP Program Manual has been completely spell checked.
adminis-trative/ formatting	FEMA-2008-0022-0067-002	Georgia Environmental Protection Division, Jim Hardeman	NUREG-0654/FEMA-REP-1, Supplement 4 was issued in draft for review and comment concurrently with the draft Radiological Emergency Preparedness Program Manual – the draft Program Manual, however, makes no reference to Supplement 4, as it does for the “approved” supplements (i.e. 1, 2 and 3).	Accepted	The appropriate references have been added to the sections of the REP Program Manual discussing the integration of NIMS/HSEEP, HAB incidents, challenging drills and exercises, and backup alert and notification. Additionally, Part IV has been updated to include a description of the changes and additional guidance Supplement 4 provides. See Part IV: Program Administration - Supplement 4 .

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
adminis-trative/ formatting	FEMA-2008-0022-0102-015	Entergy Nuclear Operations, Inc., Michael Slobodien	There is no comprehensive “red-lined” version to make ready comparisons to old and new proposed requirements. An “annotated version” was published in August, 2009 issuance of the Draft REP Program Manual, but provides only general descriptions of what other FEMA guidance has been added and consolidated in the new Manual. It is suggested that, following thecomment adjudication process, all changes to the 2002 Interim document be clearly indicated for ready comparison by all affected parties.Rationale: This will facilitate clear identification of program requirement changes with impacts on licensee and ORO plans, procedures, equipment, training and program maintenance budgets	Modified	While it is not possible at this point in time to publish a "red-line" version of the REP Program Manual showing changes from the 2002 interim publication, FEMA is publishing the final 2010 REP Program Manual update and Supplement 4 with a track changes version included. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
adminis-trative/ formatting	FEMA-2008-0022-0005-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The format of the REP Manual does not support and expeditious review because the changes are not highlighted or clearly identified.	Noted	FEMA is publishing the final 2010 REP Program Manual update and Supplement 4 with a track changes version included. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
adminis-trative/ formatting	FEMA-2008-0022-0095-015	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Clarification should also be made on the use of “references” and “resources.” According to CPG- 101 (Chapter 6, Emergency Operations Plan Content, p. 6-5), the “Authorities and References” section of an Emergency Operations Plan “provides the legal basis for emergency operations and activities.” Considering the frequency with which CPG-101 is cited in the RPM, every effort should be made to ensure consistent terminology (or clarification when terminology is not consistent) between CPG-101 and the RPM.	Noted	The commenter does not cite specific uses of these terms that may be inconsistent with CPG-101. FEMA has reviewed both documents and found the use of "references" and "resources" to be consistent between them.
adminis-trative/ formatting	FEMA-2008-0022-0098-014	Kansas Department of Health and Environment, Thomas Conley	Clarification should also be made on the use of “references” and “resources.” According to CPG- 101 (Chapter 6, Emergency Operations Plan Content, p. 6-5), the “Authorities and References” section of an Emergency Operations Plan “provides the legal basis for emergency operations and activities.” Considering the frequency with which CPG-101 is cited in the RPM, every effort should be made to ensure consistent terminology (or clarification when terminology is not consistent) between CPG-101 and the RPM.	Noted	The commenter does not cite specific uses of these terms that may be inconsistent with CPG-101. FEMA has reviewed both documents and found the use of "references" and "resources" to be consistent between them.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
adminis-trative/ formatting	FEMA-2008-0022-0101-010	Florida Division of Emergency Management, Michael Younger	Clarification should also be made on the use of “references” and “resources.” According to CPG-101 (Chapter 6, Emergency Operations Plan Content, p. 6- 5), the “Authorities and References” section of an Emergency Operations Plan “provides the legal basis for emergency operations and activities.” Considering the frequency with which CPG-101 is cited in the RPM, every effort should be made to ensure consistent terminology (or clarification when terminology is not consistent) between CPG-101 and the RMP.	Noted	The commenter does not cite specific uses of these terms that may be inconsistent with CPG-101. FEMA has reviewed both documents and found the use of "references" and "resources" to be consistent between them.
use of acronyms					
use of acronyms	FEMA-2008-0022-0104-002	Oregon Department of Energy, Shelley Carson	Overuse of acronym's in the REPP Draft Manual makes the document a hard read. Recommendation: Reduce the use of acronyms and write out uncommon acronyms to help ease the reading of this document.	Accepted	The REP Program Manual has been reviewed for acronym use. While some acronyms facilitate reading of the document, FEMA has made an effort to use only those acronyms that are necessary. Acronyms that were only used a few times in the REP Program Manual have been spelled out.
use of footnotes					
use of footnotes	FEMA-2008-0022-0042-001	Ned Wright	the material is correct as an academic document, but from a practitioners point of view, move key information from the footnote section to the body of the document, especially in Part II.	Modified	The use of footnotes cannot be completely avoided. However, the REP Program Manual has been amended to include footnote information in the body of the text wherever possible. In the REP Program Manual, footnotes are used for three primary purposes: 1) to provide a reference to the original source of a statement in the text; 2) to provide clarifying context information for language that has been quoted from other sources; and 3) to flag text that cannot be changed at this time because it is a direct quote from another reference, but is known to have been superseded. Many of the footnotes in Part II refer to information that has been changed since NUREG-0654/FEMA-REP-1 was published. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement IV are beyond the scope of this REP Program Manual revision. This comment will be noted for consideration during future revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
use of footnotes	FEMA-2008-0022-0108-005	Louisiana Department of Environmental Quality, Cheryl Chubb	The footnotes at the bottom of the criterion are distracting. You need to find a different way to reference the items, and don't make them footnotes at the bottom of the page.	Modified	The document has been reviewed for appropriate use of footnotes. However, the REP Program Manual has been amended to include footnote information in the body of the text wherever possible. The use of footnotes cannot be completely avoided. In the REP Program Manual, footnotes are used for three primary purposes: 1) to provide a reference to the original source of a statement in the text; 2) to provide clarifying context information for language that has been quoted from other sources; and 3) to flag text that cannot be changed at this time because it is a direct quote from another reference, but is known to have been superseded. Many of the footnotes in Part II refer to information that has been changed since NUREG-0654/FEMA-REP-1 was published. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement IV are beyond the scope of this REP Program Manual revision. This comment will be noted for consideration during future revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.
use of footnotes	FEMA-2008-0022-0095-013	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Throughout the manual, federal guidance documents are referenced in the body of the text. A superscript is used to reference a note at the bottom of the page that updates that information. Why not just put the current information in and delete the old reference? It is confusing the way it is now. If nothing else, put in the current reference with a superscript relating to the old reference	Modified	The REP Program Manual has been amended to place published amendments to NUREG-0654/FEMA-REP-1 (i.e., the published addenda and supplements) in the main citation with a footnote to the source of the change. Changes to NUREG-0654/FEMA-REP-1 language other than those already published and those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
use of footnotes	FEMA-2008-0022-0098-036	Kansas Department of Health and Environment, Thomas Conley	Throughout the manual, federal guidance documents are referenced in the body of the text. A superscript is used to reference a note at the bottom of the page that updates that information. Why not just put the current information in and delete the old reference? It is confusing the way it is now. If nothing else, put in the current reference with a superscript relating to the old reference.	Modified	The REP Program Manual has been amended to place published amendments to NUREG-0654/FEMA-REP-1 (i.e., the published addenda and supplements) in the main citation with a footnote to the source of the change. Changes to NUREG-0654/FEMA-REP-1 language other than those already published and those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request for second review and comment period					
request for second review and comment period	FEMA-2008-0022-0078-018	Minnesota Homeland Security and Emergency Management , kevin Leuer	Because of the significant impact these documents have on REP programs and the lack of involvement for state and local government in the review and development processed there needs to be a second comment period for the revised documents prior to implementation.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0078-002	Minnesota Homeland Security and Emergency Management , kevin Leuer	The State of Minnesota Homeland Security and Emergency Management agency is also requesting the REP Program Manual be republished for comment after the review process is completed.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0101-008	Florida Division of Emergency Management, Michael Younger	Due to the concurrency with the proposed rulemakingchanges and the proposed Supplement 4 to NUREG- 0654 from the NRC, once all comments have been received and adjudicated, the RPM should be made available for comment again to be reflective of any changes to the rules and regulations resulting from the NRC dockets.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0122-014	Emergency Management and Homeland Security Division , James Porcello	We are requesting that a second opportunity to review and comment on the draft document be provided. Given the significance of the comments that FEMA is likely to receive, we feel that a second public comment period is warranted.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request for second review and comment period	FEMA-2008-0022-0108-001	Louisiana Department of Environmental Quality, Cheryl Chubb	This document requires more review and discussion. Recommend a new comment period for the updated version that will be created from this comment period. This is not to be taken lightly and should be given more consideration than one review.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0095-014	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Given the magnitude of the changes proposed in the REP Manual, consideration should be given to publishing the document again for comment in the Federal Register. This should be done once all comments have been adjudicated and incorporated as appropriate as those changes may have a bearing on that section. Further, the finalization of Supplement 4 could have a significant impact (if there are drastic changes based on public feedback) on the REP Manual. That would further justify another review by stakeholders.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0098-013	Kansas Department of Health and Environment, Thomas Conley	Given the magnitude of the changes proposed in the REP Manual, consideration should be given to publishing the document again for comment in the Federal Register. This should be done once all comments have been adjudicated and incorporated as appropriate as those changes may have a bearing on that section. Further, the finalization of Supplement 4 could have a significant impact (if there are drastic changes based on public feedback) on the REP Manual. That would further justify another review by stakeholders.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
request for second review and comment period	FEMA-2008-0022-0101-007	Florida Division of Emergency Management, Michael Younger	Given the magnitude of the changes proposed in theRPM, consideration should be given to publishing, at a minimum, the evaluation areas (Part III.C of the RPM) for comment in the Federal Register once all comments on the RPM have been adjudicated and incorporated as appropriate as those changes may have a bearing on that section of the RPM.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment on both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
request for second review and comment period	FEMA-2008-0022-0103-003	Strategic Teaming and Resource Sharing (STARS), Carl Corbin	Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants; NUREG-0654/FEMA-REP-1/Rev. 1 Supplement 4 and FEMA Radiological Emergency Preparedness Program Manual (74 FR 23198) 1. STARS feels that comments are prematurely requested on this document given that the actual proposed rule language is also subject to comment. Given the likelihood that the actual rule language could change, an additional comment period is necessary to evaluatethis document's content against the finalized rule language.	Noted	The public was given 150 days to comment on REP Program Manual and Supplement 4. An additional public comment period is under consideration and needs to be jointly planned and coordinated with the NRC to ensure critical policy alignment of both onsite rulemaking and offsite guidance. FEMA continues to explore options to engage stakeholders. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
evaluation of non-REP plans and activities					
evaluation of non-REP plans/ activities	FEMA-2008-0022-0105-011	Tennessee Emergency Management Agency, Gary Lima	The adoption of HSEEP should not mean the evaluation of SOP's/SOG's, which are agency specific processes. Unless the EEG's in HSEEP address NUREG 0654 performance standards, the latitude for FEMA to evaluate all responding agencies beyond the scope of REP requirements will be all too easy to do – unless what is evaluated is truly what the ORO wants evaluated.	Noted	During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The adoption of HSEEP methodology does not change this approach. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC), then only those applicable portions are subject to REP review. If OROs would like to have non-REP activities evaluated during REP exercises, they must make their own arrangements for appropriate evaluators. See Part I.B - Scope and Part II.C.3 - Evaluation Criterion C.6.
evaluation of non-REP plans/ activities	FEMA-2008-0022-0106-005	Nebraska Emergency Management Agency, Jonathan Schwarz	Leave all offsite evaluation of non-Licensee assets to the no-fault HSEEP evaluation process established by the Department of Homeland Security under Presidential Directive.HAB events are contingencies already in place in Nebraska counties as a result of the events of 9/11/2001. Annex H, Appendix 1 (Terrorism) to local jurisdiction planning documents covers terrorism events to include terrorist attacks using a variety of weapons, explosives, and chemical and biological agents.	Noted	During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The adoption of HSEEP methodology does not change this approach. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC), then only those applicable portions are subject to REP review. If OROs would like to have non-REP activities evaluated during REP exercises, they must make their own arrangements for appropriate evaluators. See Part I.B - Scope and Part II.C.3 - Evaluation Criterion C.6.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
evaluation of non-REP plans/ activities	FEMA-2008-0022-0130-001	State of Vermont, Barbara Farr	Most jurisdictions now employ an “all-hazards” approach to emergency preparedness, and many of the emergency preparedness and response functions not specific to NPP (nuclear power plants) emergency preparedness are described in documents such as overall jurisdictional emergency operations plans which are referenced by REP documents and procedures. Does this language mean that FEMA will be evaluating and assessing the adequacy of these non-REP documents in the course of its review of radiological emergency preparedness around commercial NPP?	Noted	During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The adoption of HSEEP methodology does not change this approach. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC), then only those applicable portions are subject to REP review. If OROs would like to have non-REP activities evaluated during REP exercises, they must make their own arrangements for appropriate evaluators. See Part I.B - Scope and Part II.C.3 - Evaluation Criterion C.6.
revisions to NUREG-0654					
revisions to NUREG-0654	FEMA-2008-0022-0093-002	Texas Department of State Health Services, Bob Free	NUREG 0654/ FEMA-REP 1 (0654) should be updated or completely changed due to improvements in technology and emergency response capabilities.	Noted	FEMA acknowledges that there have been many improvements in technology and emergency response capabilities since NUREG-0654/FEMA-REP-1 was originally published. However, changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside the scope of the current REP Program Manual revision. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
revisions to NUREG-0654	FEMA-2008-0022-0108-006	Louisiana Department of Environmental Quality, Cheryl Chubb	The NUREG-0654 requirements are being changed. If/when the REP Manual is promulgated, will there also be a new release of the NUREG-0654 criteria?	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
revisions to NUREG-0654	FEMA-2008-0022-0102-001	Entergy Nuclear Operations, Inc., Michael Slobodien	NRC and FEMA are urged to issue the next versions of the subject documents concurrently, whether in revised draft or final form.Rationale: It is our understanding that NRC and FEMA staffs have not yet determined if the next versions of NUREG-0654, Supplement 4/FEMA-REP-1 and the Draft REP Manual will be issued concurrently following the comment adjudication phase. By not doing so, issuance at different times may cause potential inconsistencies and confusion in the review any subsequent revisions and the final implementation/transition process.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
revisions to NUREG-0654	FEMA-2008-0022-0093-039	Texas Department of State Health Services, Bob Free	Changes to 0654 are needed before Radiological Emergency Preparedness (REP) guidance is completed.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Part I. Introduction					
should/shall					
should/shall	FEMA-2008-0022-0045-001	N/A, Charles Larry Dixon	The word "should" must be defined.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
should/shall	FEMA-2008-0022-0046-001	Minnesota Homeland Security and Emergency Management, Kevin Charles	Clearly defining what is required and what is strongly recommended is important for consistent nationwide interpretation of the requirements. Without a clear definition of the term “should” it is difficult to have consistent application of the REP program manual nationwide and state and local jurisdictions are left at the varying interpretations from the different FEMA regional Offices. If its required the term needs to be “shall” so that there is consistent application nationally.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0063-001	Georgia Environmental Protection Division, Jim Hardeman	The draft document uses the word “should” frequently without definition. “Should” implies a preference for a particular action, but not a requirement. Where a requirement is intended, the preferred word is “shall”.The following definitions are suggested:The word "shall" is used to indicate mandatory requirements strictly to be followed and from which no deviation is permitted ("shall" equals "is required to"). The word "should" is used to indicate that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others; or that a certain course of action is preferred but not necessarily required; or that (in the negative form) a certain course of action is deprecated but not prohibited ("should" equals "is recommended that"). The word "may" is used to indicate a permissible course of action ("may" equals "is permitted to"). The word "can" is used for statements of possibility and capability, whether material, physical, or causal ("can" equals "is able to").	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
should/shall	FEMA-2008-0022-0073-007	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: BLANKET COMMENT for entire document. The word “should” is used extensively throughout the document. The general understanding is that the work “should” means that it is optional where the word “shall” means that it is required.Potential Impact: There is not always a consistent understanding of the definition of the world “should” by evaluation team members and within all FEMA Regions. Recommend that a statement be made within the Part II.A.1. to define the difference in terms and that the definitions are also contained in the glossary.Comment By: State/Locals	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0078-014	Minnesota Homeland Security and Emergency Management , kevin Leuer	I would suggest using the ANSI/ANS-3.8.3-1995, “Criteria for radiological emergency response plans and implementing procedures” that has the following definitions for use in the Standard: Shall, should, and may – “Shall” is used to denote a requirement; “should” to denote a recommendation and “may” to denote permission, neither a requirement, nor a recommendation.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0089-004	State of Tennessee Department of Environment and Conservation/ Division of Radiological Health, Bruce House	The REP program manual lacks definition of the term "should" and cannot be adequately reviewed and the impact of the changes understood without knowing what is truly required.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0095-006	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	The document either needs to specifically define what is meant by the terms "shall" and "may" or use words that clearly define what the expectations are in the guidance. The document can be open to very different interpretations and applications if these terms are not more clearly defined. Should one region choose to interpret the term "should" as "shall" then the document will be quite rigorously followed to the letter. If another region interprets the word "should" as "the preferred method," that could result in a more lenient application of the guidance in the development of plans and procedures. Use of the word "may" implies permission to take a course of action if one chooses. "Can" implies the ability or capability of taking an action. If one of the goals of the guidance revision is to have consistent application across all regions of the country, then the document must not leave room for interpretation. If the intent is strict compliance then use the word “shall” or “must” would be appropriate. If there is a recommended action that is preferable then “should” is appropriate and does not exclude alternative means to meet the criteria or intent. The same logic must be applied for the use of “can” and “may.”	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0096-001	Anonymous	"Should" (recommendation) vs. "shall" (requirement)?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0098-006	Kansas Department of Health and Environment, Thomas Conley	The document either needs to specifically define what is meant by the terms "shall" and "may" or use words that clearly define what the expectations are in the guidance. The document can be open to very different interpretations and applications if these terms are not more clearly defined. Should one region choose to interpret the term "should" as "shall" then the document will be quite rigorously followed to the letter. If another region interprets the word "should" as "the preferred method," that could result in a more lenient application of the guidance in the development of plans and procedures. Use of the word "may" implies permission to take a course of action if one chooses. "Can" implies the ability or capability of taking an action. If one of the goals of the guidance revision is to have consistent application across all regions of the country, then the document must not leave room for interpretation. If the intent is strict compliance then use the word “shall” or “must” would be appropriate. If there is a recommended action that is preferable then “should” is appropriate and does not exclude alternative means to meet the criteria or intent. The same logic must be applied for the use of “can” and “may.”	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0101-001	Florida Division of Emergency Management, Michael Younger	The RPM needs to include definitions for the words “should” and “shall” (as defined in the September 22, 1988 memo from Richard Krimm to Frank Begley) as these words are used throughout and a clear definition should be provided to clarify the intent where the words are used. Other words that should be clearly defined include “must”; “will”; “required”; “recommended” and other words that are action oriented. These definitions should be consistent with other FEMA planning and guidance documents.	Accepted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternatives Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0102-016	Entergy Nuclear Operations, Inc., Michael Slobodien	The document employs the terms “may”, “should”, “must” and “shall” in many sections, and it is very difficult to determine what is recommended for REP programs versus what is legally required. We recommend that FEMA define the terms of use such as done by other organizations such as ANSI (“shall”, “should” and “may”).Rationale: The lack of defined terminology will lead to multiple interpretations of whether plans, procedures, exercise programs and other REP elements are acceptable.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0104-001	Oregon Department of Energy, Shelley Carson	The terms "should" and "shall" need to be defined. Guidance from FEMA Region 10 in our first meeting regarding the REPP Draft Manual was such that, "should" means "may" and "shall" means "must." Oregon reviewed this manual with that guidance in mind. If the meaning of those two terms are different then just stated, Oregon comments will be drastically different. Recommendation: Define the terms "should" and"shall" at the beginning of the document. If they are defined differently then above, the REPP manual needs to be sent out for another review.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0105-009	Tennessee Emergency Management Agency, Gary Lima	The term usages regarding “shall” and “will” need to be consistent throughout REP planning and “should” in particular needs deletion. Either a NUREG requirement is mandatory or it is not. Taking an action especially associated with preparation for, execution of or supporting protective action decisions for safe guarding the public can not be served with the term “should.” Shall and will never give way to indecision. A wrong decision due to “should” not being decided does in fact give way to failure, while shall and will ensure the ability to measure success.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0108-003	Louisiana Department of Environmental Quality, Cheryl Chubb	Define "should." Should signifies that we are given a choice and FEMA has recently given no choice to anything following the word "should."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0126-017	Pilgrim Watch, Mary Lampert	Although there is some use of the word “shall” in the criteria; there are too many uses of the word “should” or other unenforceable or optional language.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0130-002	State of Vermont, Barbara Farr	The draft document uses the word “should” frequently without definition. “Should” implies a preference for a particular action, but not a requirement. Where the intent is a requirement, the appropriate word would be “shall”. The following definitions are suggested:The word “shall” is used to indicate mandatory requirements strictly to be followed and from which no deviation is permitted (shall equals “is required to”).The word “should” is used to indicate that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, that a certain course of action is preferred but not necessarily required, or that (in the negative form) a certain course of action is deprecated but not prohibited (“should” equals “is recommended to”).The word “may” is used to indicate a permissible course of action (“may” equals “is permitted to”).The word “can” is used for statements of possibility and capability, whether material, physical, or casual (“can” equals “is able to”).	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0117-023	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Throughout – use of the word “should”Comments: This document, although a program manual, carries the authority of regulation during the evaluations. The word “should” is used repeatedly and confuses the direction of the document. The word used must be definitive such as “Shall” or “Will”. If it is an option it should be stated clearly that it is an option. explanation/RecommendatioN: Remove the word “should” and replace it with “will” or “shall” throughout the document as applicable. Or clarify the meaning or intent of the ambiguous use of “Shall” in the introduction.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0122-005	Emergency Management and Homeland Security Division , James Porcello	It would be helpful if there was a clear definition of the following terms: "should", "shall", and "may." The REP Program Manual should clearly delineate between program requirements and optional activities. This has been a recurring issue in the past with current FEMA guidance. Early in the REP Program, they issued a Guidance Memorandum (GM) to define the difference between "should" and "shall;" both, according to FEMA, were required in opposition to the standard legal definitions that are, respectively, permissive and required . If authors of the REP Manual mean that everything must be done as specified in the Manual, then they need to say so and re-write the basic enabling legislation and regulations. Leaving the language unclear in the REP Manual will result in varying implementation and resulting conflicts from FEMA Region to FEMA Region and from year to year as personnel change.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0129-002	Wisconsin Emergency Management, Teri Engelhart	Clarification is needed on the definition of "should" and "shall". As written, "should" indicates a suggestion only, not a requirement. Only items that are required by regulation or guidance may be preceded by "shall."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

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should/shall	FEMA-2008-0022-0113-002	North Carolina Division of Emergency Management, Stephen Payne	2. REP PROGRAGENERAM MANUAL LANGUAGE/REFERENCEGENERAL ITEM: Use of the term “should”.RECOMMENDATION/COMMENT:The REP program manual needs to clearly define the term "should". There is inconstant interpretation and implementation of items identified as to what "should" means. Experience has shown that some FEMA Regions interpret "should" as being strongly recommended and other FEMA Regions say that "should" means you must do it. For state and local jurisdictions it's important to know what is truly required and what is recommended. There is a wide verity of interpretations on items identified as "should" and when FEMA issues an Area Requiring Corrective Action (ARCA) on a item identified as "should" it really means should equals shall and it's not a recommended but required item.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0113-002	North Carolina Division of Emergency Management, Stephen Payne	(continued) The current REP program Manual does not provide for a definition of the term "should" with the multiple areas in the REP program manual where the term "should" is used to identify specific standards it is vital to know if "should" really means shall or if it is really something that is strongly recommended but not required.Clearly defining what is required and what is strongly recommended is important for clear, consistent nationwide interpretation of the requirements. Without a clear definition of the term "should" it is difficult to have consistent application of the REP program manual nationwide and state and local jurisdictions are left at the varying interpretations from the different FEMA regional Offices. If its required the term needs to be "shall" so that there is consistent application nationally.		

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should/shall	FEMA-2008-0022-0121-022	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: I-8 Line: 9-11 Comments: The elements set forth are divided between "should" and "shall " statements. Which are the "required" elements that "must" be met? These need to be clearly delineated with "shall" statements so that there is minimal opportunity for misinterpretation by either planners or reviewers.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
should/shall	FEMA-2008-0022-0053-001	MN EMS Regulatory Board, Robert Michael Norten	Clearly defining what is required and what is strongly recommended is important for consistent nationwide interpretation of the requirements. Without a clear definition of the term “should” it is difficult to have consistent application of the REP program manual nationwide and state and local jurisdictions are left at the varying interpretations from the different FEMA regional Offices. If its required the term needs to be “shall” so that there is consistent application nationally.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
should/shall	FEMA-2008-0022-0121-010	Utility Radiological Safety Board of Ohio, Nancy Dragani	NUREG 0654 uses "shall ". This proposed Manual uses both "shall" and "should" . Does "should" have the same meaning as "shall" or doe s "should" indicate that the guidance is suggested but not required?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Jurisdic-tional authority					
jurisdictional authority	FEMA-2008-0022-0073-029	Washington Military Department Emergency Management Division, Jim Mullen	Recommendation: DHS/FEMA must understand the ICS and the state and local laws that govern emergency response.Comment By: State Department of Health	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."
jurisdictional authority	FEMA-2008-0022-0073-004	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: BLANKET COMMENT: The preponderance of the FEMA criterion explanations seem to be an attempt to standardize how the REP Program is implemented nationwide. This is worrisome in that there are over 100 licensed, operational nuclear power plants nationwide. Potential Impact: While a standardized approach would be easier to administer and evaluate, many state and local jurisdictions are granted their authorities via specific articles of the states' constitution. RECOMMENDATION: There is a need for each DHS/FEMA Region to understand where each state or local jurisdiction derives their specific authority.Comment By: State	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
jurisdictional authority	FEMA-2008-0022-0073-077	Washington Military Department Emergency Management Division, Jim Mullen	Recommendation: As previously mentioned; DHS/FEMA must understand that there is not a “standardized” REP response. This varied response is dictated by state laws, country ordinances, and local rules. Each jurisdiction executes their response based on their specific plans and procedures.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."
jurisdictional authority	FEMA-2008-0022-0073-086	Washington Military Department Emergency Management Division, Jim Mullen	DHS/FEMA also needs to understand the authority given by law to state and local officials during an emergency	Noted	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."
jurisdictional authority	FEMA-2008-0022-0117-001	California Emergency Management Agency, Elaine Jennings	Within NUREG 0654/FEMA REP-1, the issue of “home rule” states must be addressed. A “home rule” state is where the Local Jurisdictions (Cities and Counties) are responsible for the program and the state plays a support role. Throughout the guidance the individual criterion are identified as required by Licensee, State, or Local. Clarification is required to discern the responsible party in “home rule” states as opposed to state run programs. Guidance should be included to reduce misunderstandings and possible conflict.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."
jurisdictional authority	FEMA-2008-0022-0117-002	California Emergency Management Agency, Elaine Jennings	For many of the criterion within a “home rule” state, where the locals are responsible for the program and the state plays a support role, both the state and locals are identified as responsible for the criterion. In most states where the program is state run, the state would demonstrate as well as the locals. In a “home rule” state, with the state in only a supporting role, only the locals are responsible for demonstrating the criterion. For example Criterion D.4 – In a “home rule” state only the locals take emergency actions. The state supports the decision and implementation of the action but does not have responsibility for the criterion.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. See also Part I.B - Scope, definition of "ORO."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
"plans/ procedures"					
"plans/procedures"	FEMA-2008-0022-0111-011	Illinois Emergency Management Agency, Andrew Velasquez	The terms "plan(s)" and/or "procedure(s)" as used in this manual include radiological supporting and referenced materials, all of which are subject to review. This greatly expands the planning criteria of NUREG-0654 to include procedure review.	Modified	Additional clarification has been added to the REP Program Manual. REP plan review has always included procedure review to the extent necessary to assess whether the Planning Standards are adequately addressed. During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO. NUREG-0654/FEMA-REP-1 also refers to procedures as part of the overall set of planning documents. Further explanation has been added to the glossary entry for plans/procedures. See Appendix B - Glossary of REP Terms.
"plans/procedures"	FEMA-2008-0022-0069-001	Georgia Environmental Protection Division, Jim Hardeman	Page I-2, lines 18-19. Most jurisdictions now employ an "all-hazards" approach to emergency preparedness, and many of the emergency preparedness and response functions not specific to nuclear power plant emergency preparedness are described in documents, such as overall jurisdictional emergency operations plans, which are referenced by REP documents and procedures. Does this language mean that FEMA will be evaluating, and assessing the adequacy of, these non-REP documents in the course of its review of radiological emergency preparedness around commercial nuclear power plants?	Modified	Additional clarification has been added to the REP Program Manual. During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The adoption of HSEEP methodology does not change this approach. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC), then only those applicable portions are subject to REP review. If OROs would like to have non-REP activities evaluated during REP exercises, they must make their own arrangements for appropriate evaluators. See Part I.B - Scope. and Part II.C.3 - Evaluation Criterion C.6.
"technical references "					
"technical references"	FEMA-2008-0022-0111-036	Illinois Emergency Management Agency, Andrew Velasquez	page I-I, lines 21-28 leaves some doubt as to the purpose of the non-technical references in Appendix C.	Modified	FEMA concurs. The term "technical" has been removed from the cited passage. See Part I.A - Purpose.
I.B. Basis of the REP Program					
I.B. Basis of The REP Program	FEMA-2008-0022-0129-003	Wisconsin Emergency Management, Teri Engelhart	Page: I-4, Line: 8 Comment: Use of state and local staff as evaluators. Has this recommendation been implemented, or are there plans to implement?	Noted	Yes, State, local, and Tribal personnel may take the training needed to become FEMA REP evaluators. Refer to REP Program Manual Part IV.C - Use of State, Local, and Tribal Personnel as REP Evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
I.B.2 Post 9/11 Programmatic Changes					
I.B.2 Post 9/11 Programmatic Changes	FEMA-2008-0022-0117-015	California Emergency Management Agency, Elaine Jennings	Part I.B p. 4-5: FEMA/DHS National Preparedness Initiatives Lines 27-35 and 1-34Comments: Line 35 states Revisions to this document address alignment and integration of the REP Program with two specific initiatives (1) NIMS and (2) HSEEP. explanation/RecommendatioN: Remove the following sections:Page I-4 line 27 starting with "These.. To page I-5 line 34.The additional narrative provides no added benefit to the NIMS and HSEEP discussion.	Rejected	FEMA acknowledges that not all of the information in the cited bullets is specific to the NIMS and HSEEP discussion, but FEMA feels that the material provides useful background information on documents that are cited as supporting references throughout the REP Program Manual.
I.B.2 Post 9/11 Programmatic Changes	FEMA-2008-0022-0117-016	California Emergency Management Agency, Elaine Jennings	[Part I.B, p.5, Lines 13-23] CPG 101 the document contradicts the planning needs and evaluation criteria for NPP and is unsuitable for use in NPP planning. This reference should be removed throughout the document.NPP planners are expected to plan for as much as possible to address both exercise criteria and actual emergencies at nuclear power plants. Case in point – calculating the suitability of issuing potassium iodide to the public. The calculation and decision process are very detailed and specific.	Rejected	FEMA recognizes that REP planning requirements are much more specific than the guidelines in CPG 101; however, CPG 101 contains a wealth of guidance that helps planners to develop the core parts of their plans, as well as considerations for the more specific parts.
"incident" versus "event"					
"incident" versus "event"	FEMA-2008-0022-0073-006	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: BLANKET COMMENT for entire document. The word Event is used often to indicate that an occurrence of some sort has happened. In keeping with the common terminology feature of NIMS/ICS, recommend that the word Event be replaced by the word Incident.	Accepted	The suggested change has been incorporated into the REP Program Manual where appropriate. The definition of "incident" consistent with NIMS will be added to glossary (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
"incident" versus "event"	FEMA-2008-0022-0106-001	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: DocumentComment: General Comment # 1: NIMS/ ICS are already covered by other Department of Homeland Security (DHS) publications, The National Incident Management Systems (NIMS) and the National Response Framework (NRF) which are regulated and certified by the State of Nebraska. Local plans and procedures were certified as NIMS compliant by the Governor of Nebraska through the Nebraska Emergency Management Agency (NEMA) during 2005. Requirements beyond those certified by the Governor of Nebraska should not be required in any local jurisdiction just because of proximity to a Nuclear Power Station.Potential Impact: These potential changes to local plans would not be in compliance with templates for local planning designated/certified, by the NEMA and codified in law by the State of Nebraska. Further, these potential requirements would make seven Nebraska counties prepare local planning documents that go beyond required NEMA guidance and hence do not correspond to the other 86 counties of the State of Nebraska.	Noted	HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
"incident" versus "event"	FEMA-2008-0022-0097-001	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The National Incident Management System (NIMS) was developed, in part, based on the California Standardized Emergency Management System (SEMS), which is certified by the State of California. Local emergency plans and procedures have all been certified by the State of California as “NIMS Compliant.” Requirements beyond those certified by the State of California as NIMS Compliant should not be required in any local jurisdiction based soley on their proximity to a Nuclear Power Plant.	Noted	HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration					
REP-HSEEP integration	FEMA-2008-0022-0080-001	Douglas Fleck	Page I-6, Line 4 mentions "standardizing exercise design, conduct, and evaluation" but we can find no indication as to how this standardization will be accomplished. This standardization is a worthy goal and needs to be pursued. Presently there is broad leeway given to RAC Chairs concerning evaluation standards. For example, when timing starts for route alerting, evaluating all EOC and schools in an EPZ versus merely one third, etc. These differing standards between regions create much confusion and animosity. These differences are really noticeable when an EPZ affects two or more FEMA Regions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The minimum standard as outlined in the REP Program Manual is the same for all Regions. Some States choose to go above and beyond the minimum, and FEMA supports that choice.
REP-HSEEP integration	FEMA-2008-0022-0080a-001	Pennsylvania Emergency Management Agency, Douglas Fleck	Page I-6, Line 4 mentions "standardizing exercise design, conduct, and evaluation" but we can find no indication as to how this standardization will be accomplished. This standardization is a worthy goal and needs to be pursued. Presently there is broad leeway given to RAC Chairs concerning evaluation standards. For example, when timing starts for route alerting, evaluating all EOC and schools in an EPZ versus merely one third, etc. These differing standards between regions create much confusion and animosity. These differences are really noticeable when an EPZ affects two or more FEMA Regions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The minimum standard as outlined in the REP Program Manual is the same for all Regions. Some States choose to go above and beyond the minimum, and FEMA supports that choice.
REP-HSEEP integration	FEMA-2008-0022-0100-002	Pennsylvania Emergency Management Agency, Henry Tamanini	Page I-6, Line 4 mentions "standardizing exercise design, conduct, andevaluation". The standardization is a noteworthy goal and needs to be pursued. Presently there appears to be broad leeway given to the FEMA Regions concerning the present REP evaluation standards. Examples of the nonstandard approach include the "timing" of back-up route alerting demonstrations and the demonstration requirements during school exercises. These nonstandard methods result in confusion and concern especially when an EPZ involves multiple FEMA Regions and multiple states or jurisdictions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The minimum standard as outlined in the REP Program Manual is the same for all Regions. Some States choose to go above and beyond the minimum, and FEMA supports that choice.
REP-HSEEP integration	FEMA-2008-0022-0106-026	Nebraska Emergency Management Agency, Jonathan Schwarz	FEMA will require additional evaluation staff to perform valid evaluations involving NIMS/ICS, the NRF, and HAB events. Minimal classroom training is no substitute for the knowledge and experience necessary to evaluate competent elected officials and public employees performing in their Emergency Support Functions (ESF).	Noted	OROs are not evaluated on NIMS compliance during REP exercises. HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). OROs are evaluated against the command structures and standards of their own plans/procedures, whether they are using NIMS/ICS or not. The credentialing process for REP evaluators is currently undergoing revision.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration	FEMA-2008-0022-0129-004	Wisconsin Emergency Management, Teri Engelhart	Page: I-6, Line: 7 Comment: Combining multiple requirements into fewer total exercises as a way to reduce exercise fatique. Clarification is needed on how this will "reduce exercise fatigue?" Will REP requirements be evaluated during local/regional exercises, or will local units of government participate in REP exercises to meet their other exercise criteria?	Modified	HSEEP methdology reduces fatigue in that requirements for other exercises can be evaluated at REP exercises. This is discussed in detail in the Part III.A - Introduction and Part III.B - REP Exercise Process.
REP-HSEEP integration	FEMA-2008-0022-0016-001	Alabama Office of Radiation Control, Jim McNees	As stakeholders, those of us in radiation control who have functions in REP events would like to have the opportunity to read, comment on, provide suggestions to, and help improve what will become the HSEEP evaluation criteria for use in REP exercises. Especially those related to radiation hazard assessment, plume modeling, contamination evaluation and control, field monitoring, air sampling, reentry sampling, sample analysis, and personal exposure monitoring, to name a few.	Noted	The REP Exercise Evaluation Criteria are still being used to evaluate REP exercises. HSEEP does not have its own evaluation criteria; rather, HSEEP is exercise-building and reporting methodology. HSEEP is not intended to alter or dilute REP exercise evaluation criteria. EEGs have been developed using REP criteria as activities under the capabilities and are available through the FEMA Regions and on LLIS. Stakeholders participate in customizing EEGs for each exercise. Capabilities have been crosswalked with REP criteria. HSEEP concepts are incorporated into the REP Program Manual.
REP-HSEEP integration	FEMA-2008-0022-0093-040	Texas Department of State Health Services, Bob Free	The obvious disconnects between Homeland Security Emergency Exercise Program (HSEEP) and REP criteria should be addressed first. There are a multitude of discrepancies to be addressed such as the differences in 44CFR 350 and HSEEP requirements as well as discrepancies between REP guidance and the Target Capabilities list. We strongly encourage the Federal Emergency Management Agency (FEMA) and the Nuclear Regulatory Commission (NRC) to conduct a complete review and update of 0654.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration	FEMA-2008-0022-0093-005	Texas Department of State Health Services, Bob Free	We applaud the incorporation of HSEEP in the REP Program. There are some advantages to using HSEEP. It provides for real event response credit, it provides clear instruction regarding the conduct and content of after action meetings, it provides great flexibility in demonstration of exercise criteria , and most importantly, it provides a single exercise methodology for local jurisdictions that receive federal grants and are required to comply with NIMS. This is especially important in Home Rule states.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
REP-HSEEP integration	FEMA-2008-0022-0100-001	Pennsylvania Emergency Management Agency, Henry Tamanini	PEMA commends the US NRC and FEMA for the development of the revised draft regulations. It is especially commendable that the National Incident Management System (NIMS) and the Homeland Security Exercise Evaluation Program (HSEEP) are being integrated into the FEMA Radiological Emergency Response Program (REP).The alignment and integration of the REP Program with the two specific initiatives, NIMS and HSEEP, will hopefully standardize the evaluation criteria among FEMA National and the FEMA Regions responsible for the REP Program. Properly managed, the standardization should reduce the disparity between FEMA Regions which has in some cases been evident when the Plume Exposure Pathway Emergency Planning Zone of a commercial nuclear power plant encompasses multiple states and FEMARegions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
REP-HSEEP integration	FEMA-2008-0022-0119-012	Progress Energy, Kenneth Heffner	With REP objectives integrated with HSEEP objectives will licensees become eligible for HSEEP grant funds?	Noted	The REP/HSEEP integration alone does not create licensee eligibilty for HSEEP grant funds.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration	FEMA-2008-0022-0111-002a	Illinois Emergency Management Agency, Andrew Velasquez	IEMA's second comment is that FEMA revise 44CFR350 to finally implement the Homeland Security Exercise and Evaluation Program (HSEEP) into the REP program. In particular 44 CFR 350.9 sections c.5, d and e must be revised. Because the current method of evaluating exercises and issuing deficiencies is in direct conflict with the evaluation process whereby the exercising entity under HSEEP is responsible for exercise evaluation and the associated corrective action program, it is recognized that FEMA did not address this issue in the proposed revisions to Supplement 4 to NUREG-0654 or the FEMA REP Manual. While there are numerous references to being HSEEP compliant, only the FEMA REP Manual addresses exercise evaluation. In the area of exercise evaluation the FEMA REP Manual is largely unchanged from the draft 2002 version. The solution to this incomplete revision is to change 44 CFR 350.9 to incorporate HSEEP and by doing so revise the way FEMA makes its reasonable assurance fmding. The first change required to do this is to revise 44 CFR 350.9.c.5 to remove the wording "Remedial exercises may be required to correct deficiencies observed in exercises conducted	Noted	It is not in the best interest of the health and safety of the public to eliminate ARCAs and Deficiencies, nor will the public be adequately assured if response organizations are only self-evaluated. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
REP-HSEEP integration	FEMA-2008-0022-0111-002b	Illinois Emergency Management Agency, Andrew Velasquez	(continued)for continued FEMA approval." In its place, the planning standards in 44 CFR 350.5 would form the basis for determining a deficiency and also for when a deficiency exists. Unlike the current arbitrary and subjective process, FEMA should adopt a system similar to the NRC process used to evaluate licensee performance. In particular, once HSEEP is fully incorporated into REP, the offsite response organization will be responsible for evaluating its own performance and correcting any problems noted. FEMA's role should be monitoring the offsite response organization's corrective action program. In accordance with 44 CFR 350.5.a.14 the offsite response organization is responsible for correcting deficiencies identified in exercises. By revising 44 CFR 350.9.d to incorporate HSEEP, FEMA's responsibility will remain the same but the process for identifying a deficiency will be revised to state that a deficiency is defined as "a failure to correct a previously identified significant problem from a previous exercise." A significant problem is defined as a failure to adequately demonstrate the risk significant planning		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration	FEMA-2008-0022-0111-002c	Illinois Emergency Management Agency, Andrew Velasquez	(continued) standards in 44 CFR 350.5. Risk significant planning standards are the same planning standards as defined in the NRC's "Technical Basis For Emergency Preparedness Significance Determination Process". It is also recommended that FEMA revise 44 CFR 350.9.e to reference HSEEP so that the responsibility for evaluating the exercise is clearly defined as that of the ORO. In addition, NUREG-0654 criterion N.4 and N.5 need to be revised to reference HSEEP; specifically N.4 and N.5 should be combined and specify that the exercise evaluation, after action reporting, improvement planning and corrective action programs be conducted in accordance with HSEEP. Section III of the FEMA REP manual could largely be eliminated by referencing the appropriate HSEEP documents. Partial implementation of HSEEP into REP will result in failure of both programs.		
REP-HSEEP integration	FEMA-2008-0022-0110-037	Alabama Emergency Management Agency, J Frank Price	Overall the changes in section III where not significant with the commitment to use HSEEP. There are some clarifications and some added items i.e… schools PADs (that need more clarification) but, since the many references to HSEEP and NIMS/ICS, and this being the evaluation criterion, more details should be included using HSEEP specific standards in lieu of generic references. An example is using an Incident Command Post for an REP event.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
REP-HSEEP integration	FEMA-2008-0022-0121-005	Utility Radiological Safety Board of Ohio, Nancy Dragani	Both documents emphasize that REP must be integrated into HSEEP yet no guidance is provided on how to accomplish this.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
REP-HSEEP integration	FEMA-2008-0022-0095-009	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	While the HABD initiative was tested in the most experienced response community (REP), it needs to be expanded under HSEEP to be more complete for testing all hazard approaches. Federal, state, tribal and local response organizations need to discuss more fully the best way to develop an innovative and challenging exercise schedule that meets the regulatory requirement, provides challenging (unpredictable) scenarios, and provides the greatest opportunity for training.	Noted	Changes to HSEEP are outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.
REP-HSEEP integration	FEMA-2008-0022-0098-009	Kansas Department of Health and Environment, Thomas Conley	While the HABD initiative was tested in the most experienced response community (REP), it needs to be expanded under HSEEP to be more complete for testing all hazard approaches. Federal, state, tribal and local response organizations need to discuss more fully the best way to develop an innovative and challenging exercise schedule that meets the regulatory requirement, provides challenging (unpredictable) scenarios, and provides the greatest opportunity for training.	Noted	Changes to HSEEP are outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.

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REP-HSEEP integration	FEMA-2008-0022-0073-047	Washington Military Department Emergency Management Division, Jim Mullen	Potential Impact: RECOMMENDATION: It is recommended that this Draft Program Manual be rewritten to incorporate HSEEP concepts and terminology in order to be consistent with HSEEP as it is used throughout the Department of Homeland Security and the nation. Instead of a REP Program Manual, Develop Exercise Evaluation Guides. Criteria do not exist within the HSEEP program; incorporate the Target Capabilities List capabilities, which in turn are based on tasks from the Universal Task List. The EEGs, Target Capabilities, and Universal Tasks would then be incorporated into an HSEEP based REP program manual.Comment By: State Department of Health	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
REP-HSEEP integration	FEMA-2008-0022-0105-001	Tennessee Emergency Management Agency, Gary Lima	As a general statement of philosophy it is our opinion in the Fixed Nuclear Facilities Program that FEMA is attempting to address HSEEP on top of changes that affect our REP plans and has yet to cross reference NUREG 0654 performance standards aligned with EEG's which are not yet fully drafted. Specific comments below identify several areas of concern that need closure in support of State Radiological Emergency Preparedness by insisting NRC rule making is addressed first (NUREG 0654 for off-site), finalized and then procedures with exercise evaluation methodology being addressed, i.e. HSEEP design for REP event exercises as a new exercise evaluation methodology IAW NRC regulations.	Noted	Identification of TCLs for use in REP EEGs has already been accomplished. A copy of the crosswalk and link for updates of the REP criteria to the TCL has been included in the REP Program Manual. EEGs have been built with capabilities, using criteria as activities under the capabilities. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.

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REP-HSEEP integration	FEMA-2008-0022-0110-001	Alabama Emergency Management Agency, J Frank Price	page I-5, lines 1-5, 6-23, and 35-41: These paragraphs all referred to the process started by DHS on NIMS, ICS, NRF, and IPS for and integrated system for response to all hazard incidents. The understood purpose, per these paragraphs, is for this change to incorporate REP into the National Plan. The proposed changes to the NRC rule and the change to the FEMA program manual by not committing to the identified items has probably created a evaluating program that fails to produce. ICS is the incident management use for response; allowing utilities to use the existing system and not ICS will require adjustments until the change is made. Using current REP criterion is okay but, should be folded into the Target Capabilities List with a toolkit that will provide consistency in the REP evaluation program, and the HSEEP model of evaluation and improvement planning will work on REP as any other major program. OROs have been conditioned because the program exists with an evaluation process designed to produce the same required results. HSEEP encourages exercising, evaluating the exercise and designing the next exercise to improve response thru self evaluation, verses passing a test.	Modified	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
REP-HSEEP integration	FEMA-2008-0022-0095-002	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	First, the full implementation of a Homeland Security Exercise and Evaluation Program (HSEEP), rather than a hybrid version of the methodology, will require considerable training at the federal (evaluators), state and local levels. Because HSEEP is essentially a self-evaluation process, the implementation cannot proceed until all state, county and local planners and personnel assigned to evaluate exercises are trained and competent to perform this function. Additionally, each state will need to evaluate the methods used to perform the requirements of the HSEEP program. That will include developing a corrective action program that can identify and track exercise issues and deficiencies and a process for improvement planning.	Noted	The REP Program cannot be entirely no-fault or self-evaluated. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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REP-HSEEP integration	FEMA-2008-0022-0098-002	Kansas Department of Health and Environment, Thomas Conley	the full implementation of a Homeland Security Exercise and Evaluation Program (HSEEP), rather than a hybrid version of the methodology, will require considerable training at the federal (evaluators), state and local levels. Because HSEEP is essentially a self-evaluation process, the implementation cannot proceed until all state, county and local planners and personnel assigned to evaluate exercises are trained and competent to perform this function. Additionally, each state will need to evaluate the methods used to perform the requirements of the HSEEP program. That will include developing a corrective action program that can identify and track exercise issues and deficiencies and a process for improvement planning.	Noted	The REP Program cannot be entirely no-fault or self-evaluated. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
implementation strategy and timeline for new requirements					
implementation strategy and timeline for new requirements	FEMA-2008-0022-0095-036	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	FEMA needs to be cognizant of the limited resources and funding for these programs at the state, county and local levels as a result of the poor economic climate. Implementation of the changes will not be a quick and easy process and needs careful planning.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0098-035	Kansas Department of Health and Environment, Thomas Conley	FEMA needs to be cognizant of the limited resources and funding for these programs at the state, county and local levels as a result of the poor economic climate. Implementation of the changes will not be a quick and easy process and needs careful planning.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0108-004	Louisiana Department of Environmental Quality, Cheryl Chubb	FEMA has performed plan reviews recently and included some of the non-promulgated material from the REP Manual as requirements. Will FEMA re-review the State plans and State/local procedures after this is promulgated? If so, when? This relates to the "when do we have to have the conversions complete" issue. What if a requirement from the non-promulgated material is deleted after this comment period? Will our records still show that we were required to make that change?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0105-003	Tennessee Emergency Management Agency, Gary Lima	Building the NRC performance standards for off-site first puts the horse back in front of the cart. HSEEP must have EEG's established to meet performance standards for "grade" and not implied areas that need improvement post exercise (sounds like the old ARFI.) Additionally, since these changes will be further discussed in December in Orlando during the FEMA IV Region conference, as a Beta Course, would in fact an extension through an addendum to the Federal Register be appropriate? The State of Alabama will exercise in a couple of weeks under the Beta test – I understand that their EEG's have been worked, yet other states were not present during the working meetings to write this document. An RWG or two would have made it a radiological community effort. Understanding the process would have gone a long way to making certain that we had a stronger incite in responding to the Federal Register.	Noted	EEGs have been developed and are available through the FEMA Regions and on LLIS. Capabilities have been crosswalked with REP criteria. HSEEP concepts are incorporated into the REP Program Manual. See Appendix G - Integration of REP Criteria and HSEEP Capabilities. After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, costs, procedures, capacities, and needed resources.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0061-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The REP Program manual does not describe and implementation timeline and a timeline needs to be developed and published for comment.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0077-002	PA DEP Bureau of Radiation Protection, David Allard	PA BRP believes that more guidance needs to be provided in regards to the implementation of scheduling the additional requirements set out in this section, for states with multiple reactor sites.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0078-001	Minnesota Homeland Security and Emergency Management, kevin Leuer	There is no timeline for implementation of the changes identified in these documents and local and state agencies need to be part of the discussion on the implementation timeline. The implementation timeline should be published for comment once it is developed.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0078-019	Minnesota Homeland Security and Emergency Management, kevin Leuer	The REP Program manual does not describe and implementation timeline and a timeline needs to be developed and published for comment.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0078-004	Minnesota Homeland Security and Emergency Management, kevin Leuer	The hostile action exercise requirements are being established before the hostile action based response planning requirements have been developed. The planning requirements and evaluation criteria for hostile action based incidents need to be established first, then a hostile action based response plan needs to be developed, and then the hostile action drills should be conducted. Current HAB Drills are not using the basis of a plan or evaluation criteria; we are drilling on the basis of having a hostile action exercise and not on planning guidance or actual plans.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0086-001	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	There will be significant impacts on ORO REP programs, including plan and procedure changes, and budget implications affecting training, exercises, equipment purchases and maintenance costs. Sufficient lead time is needed for such changes to be incorporated into budget cycles and program planning. It is critical that a well-defined timetable be established and communicated to stakeholders for the next steps of the Rulemaking process, including adjudication, publication of revised NUEG-0654 Supplement 4 and REP Program Manual, any "second round" comment period, final approval date and any allowable transition period. It is further suggested that the transition period allow for at least a full 2-year biennial exercise period beyond the final approval date of NUREG-0654 Supplement 4 and the REP Manual.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0086-004	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	there should be a sufficient lead time for integration of ICS/NIMS concepts and terminology with REP. Licensees in particular have less familiarity with the standard organization and functions associated with NIMS/ICS and will need time for the "cross-walk" between REP and NIMS/ICS to be assimilated into their current REP plans and procedures. Such a transition should be specifically identified and allowance made through a 2-year transition period when the final rulemaking documents are finalized.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0102-014	Entergy Nuclear Operations, Inc., Michael Slobodien	Based upon information provided to date, only general timeframes have been communicated concerning the remainder of the final approval and implementation phases of the REP Program Manual. It is essential that a well-defined timetable be established and communicated to licensees and OROs for the next steps of the this process, including adjudication, publication of the revised draft REP Program Manual, any “second round” comment period, final approval and the target date for implementation.Rationale: There may be significant impacts on licensee and ORO REP programs, including plan and procedure changes, and budget implications affecting training, exercises, equipment purchases and maintenance costs. Sufficient lead time is needed for such changes to be incorporated into budget cycles and program planning.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0102-002	Entergy Nuclear Operations, Inc., Michael Slobodien	To date, only general timeframes have been communicated concerning the remainder of the final approval and implementation phases of NUREG-0654 Supplement 4/FEMA-REP-1. A well-defined timetable should be communicated to licensees and OROs for the next steps of the this process, including adjudication, publication of the revised NUREG-0654 Supplement 4 and REP Program Manual, any additional comment period, final approval and implementation date.Rationale: There may be significant impacts on licensee and ORO REP programs, including plan and procedure changes, and budget implications affecting training, exercises, equipment purchases and maintenance costs. Sufficient lead time is needed for such changes to be incorporated into budget cycles and program planning.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0108-012	Louisiana Department of Environmental Quality, Cheryl Chubb	What timeframe, after promulgation, will be allowed prior to making HSEEP & NIMS, in both the plan and in field, mandatory? You must consider plans and procedures that are not currently in NIMS/ICS format. HSEEP requires a high level of administration, paperwork and knowledge of the program (i.e., TCLs that are appropriate). It will be time consuming. Consider a staff of two with three plants, include hospitals, reception centers, monitoring/decon. HSEEP would overwhelm that staff and consume even more time just to make the transition. Also, there are organizations that have not had the opportunity to have HSEEP training for all required personnel. FEMA should perform HSEEP classes in the regions as it can be difficult to obtain locally. HSEEP also needs to have TCLs that are specific to the REP program which already has clearly defined evaluation criteria. If there is no TCL interoperability between REP and HSEEP, it cannot have value to the REP community. It has been said that REP is more advanced, efficient and mature than HSEEP. If that is so, why mandate an essential step backwards?	Noted	HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program. HSEEP does not change the delivery of the REP Program for OROs. The REP program is mandated by regulations to assess the adequacy of radiological emergency plans and preparedness using specific criteria. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. After adjudicating all public comments and finalizing REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0108-002	Louisiana Department of Environmental Quality, Cheryl Chubb	What timeframe, after promulgation, will be allowed for plans/procedures to become compliant with the additional requirements that had been added to each criterion.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0122-012	Emergency Management and Homeland Security Division , James Porcello	A timeline for implementation of the new REP Program Manual would greatly assist state, local and utility agencies in preparation for the changes. How will conflicts, interpretations, and changes be handled?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0121-003	Utility Radiological Safety Board of Ohio, Nancy Dragani	Public meetings are helpful, but focus groups would be beneficial once the documents are finalized to provide guidance on implementation.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0121-004	Utility Radiological Safety Board of Ohio, Nancy Dragani	What is the implementation period once the document s are finalized?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0105-010	Tennessee Emergency Management Agency, Gary Lima	A period of one (1) year minimum moratorium will be necessary to convert to the HSEEP exercise evaluation methodology, because all developed and approved EEG's are not necessarily equal to the original 33 objectives embedded in the six (6) Evaluation Areas (Criteria.) Depending on how much NUREG – 0654, Supplement 4 and REP Manual changes affect changes to our plans.	Noted	HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program. HSEEP does not change the delivery of the REP Program for OROs. The REP program is mandated by regulations to assess the adequacy of radiological emergency plans and preparedness using specific criteria. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. After adjudicating all public comments and finalizing REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0105-023	Tennessee Emergency Management Agency, Gary Lima	Each state should have the opportunity to experience a moratorium in the first year of HSEEP delivery. Once this Beta phase is completed and enough lessons learned are integrated for adjusting the performance standards addressed in the new rules, then and only then should a State receive a graded evaluation. The new EOP's that are developed can not be a one size fits all, but tailored for the particular state being exercised. The EEG's should reflect NUREG criterion, which is the only acceptable standard for measuring success or failure.	Noted	HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program. HSEEP does not change the delivery of the REP Program for OROs. The REP program is mandated by regulations to assess the adequacy of radiological emergency plans and preparedness using specific criteria. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. After adjudicating all public comments and finalizing REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The Implementation Strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final Implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0095-001	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	There is great concern at many levels of state, county and local government regarding the timing and protocol for implementation of the changes that are proposed in the draft documents released by both FEMA and the U. S. Nuclear Regulatory Commission (NRC).Careful consideration should be given to this process that includes stakeholder input at the appropriate time.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0098-001	Kansas Department of Health and Environment, Thomas Conley	1. There is great concern at many levels of state, county and local government regarding the timing and protocol for implementation of the changes that are proposed in the draft documents released by both FEMA and the U. S. Nuclear Regulatory Commission (NRC).Careful consideration should be given to this process that includes stakeholder input at the appropriate time.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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implementation strategy and timeline for new requirements	FEMA-2008-0022-0095-004	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	It is the CRCPD's understanding that one of the goals in revising the REP Program Manual and Supplement 4 to NREG-0654 was to bring the REP program into compliance with the HSEEP program. The proposed revisions to the published documents do not accomplish that goal. As they are written, the documents are merely a hybrid of the two, leaving some REP language and guidance intact while incorporating portions of HSEEP. In order to become 100% compliant with HSEEP, there is much more work that needs to be done. In particular, 44 CFR 350 needs to be revised to reflect the intent of HSEEP. Once fully HSEEP compliant, the offsite response organizations will be responsible for exercise evaluation by identifying issues during exercises, performing improvement planning post exercise and entering them into a corrective action program. The role of FEMA will be to oversee the process in order to determine if state, local and tribal response organizations are meeting expectations of the guidance and regulation, thus providing reasonable assurance. We believe the documents as written will not be HSEEP compliant and cause confusion not only among state planners but with the evaluation process itself. If the FEMA evaluation program does not become 100% compliant with HSEEP, there will never be consistency among the regions with regard to exercise evaluation, corrective action plans and reasonable assurance. This must be addressed.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
implementation strategy and timeline for new requirements	FEMA-2008-0022-0098-004	Kansas Department of Health and Environment, Thomas Conley	It is the CRCPD's understanding that one of the goals in revising the REP Program Manual and Supplement 4 to NREG-0654 was to bring the REP program into compliance with the HSEEP program. The proposed revisions to the published documents do not accomplish that goal. As they are written, the documents are merely a hybrid of the two, leaving some REP language and guidance intact while incorporating portions of HSEEP. In order to become 100% compliant with HSEEP, there is much more work that needs to be done. In particular, 44 CFR 350 needs to be revised to reflect the intent of HSEEP. Once fully HSEEP compliant, the offsite response organizations will be responsible for exercise evaluation by identifying issues during exercises, performing improvement planning post exercise and entering them into a corrective action program. The role of FEMA will be to oversee the process in order to determine if state, local and tribal response organizations are meeting expectations of the guidance and regulation, thus providing reasonable assurance. We believe the documents as written will not be HSEEP compliant and cause confusion not only among state planners but with the evaluation process itself. If the FEMA evaluation program does not become 100% compliant with HSEEP, there will never be consistency among the regions with regard to exercise evaluation, corrective action plans and reasonable assurance. This must be addressed.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0087-001	South Carolina Emergency Management Division, Danny Loomis	Page 1-8 (line 27): "FEMA may review off-site emergency preparedness on its own Initiative or at the request of the NRC. What are the Initiating conditions that would require this, and why doesn't the language address coordinating with the OROs?	Noted	The cited language is quoted directly from the regulations. The remainder of the paragraph provides additional explanation. While not mentioned in the explanation, FEMA will continue coordinating with OROs through this process. An example would be a Disaster-Initiated Review. See Part IV.Q - Disaster-Iniated Review.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0129-005	Wisconsin Emergency Management, Teri Engelhart	Page: I-8, Line: 27 - 38 Comment: Add a statement to make sure the reader understands that there is 240 days cumulative between the time that the lack of "reasonable assurance" is noted to the time it must be resolved.	Modified	The cited text is from regulatory language. Note that any time there is a question affecting reasonable assurance, every effort should be made to resolve it as quickly as possible in the interest of protecting the health and safety of the public. Language has been added to the cited paragraph to clarify the sequence of events. See Part I.D - Evaluation of Radiological Emergency Preparedness Section 1 - NRC-FEMA Memorandum of Understanding.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
implementation strategy and timeline for new requirements	FEMA-2008-0022-0120-001	Alabama Emergency Management Agency, La'Tonya Stephens	Page I-8, line 28-38 Is this happening simultaneously or is there a total of 240 days for this process?	Modified	The cited text is from regulatory language. Note that any time there is a question affecting reasonable assurance, every effort should be made to resolve it as quickly as possible in the interest of protecting the health and safety of the public. Language has been added to the cited paragraph to clarify the sequence of events. See Part I.D - Evaluation of Radiological Emergency Preparedness Section 1 - NRC-FEMA Memorandum of Understanding.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0110-002	Alabama Emergency Management Agency, J Frank Price	page I-8, lines 27-35: If FEMA has a finding with the REP plan that there is no longer “reasonable assurance…” the State and the State will have “120 days… the issue is fixed”. Then in the paragraph FEMA notifies NRC… and has to make changes in 120 days. Does the 120 days run concurrent for both are is the total time 240 days?	Modified	The cited text is from regulatory language. Note that any time there is a question affecting reasonable assurance, every effort should be made to resolve it as quickly as possible in the interest of protecting the health and safety of the public. Language has been added to the cited paragraph to clarify the sequence of events. See Part I.D - Evaluation of Radiological Emergency Preparedness Section 1 - NRC-FEMA Memorandum of Understanding.
implementation strategy and timeline for new requirements	FEMA-2008-0022-0129-006	Wisconsin Emergency Management, Teri Engelhart	Page: I-9, Line: 11 - 12 Comment: Questions regarding the evaluation of offsite plans are to be directed to FEMA HQ. In order to ensure timely responses it is necessary to specify a timeframe (i.e. 10 days) in which FEMA Headquarters has to respond to the Region or ORO of its determination of the interpretation and that the response shall be provided in writing.	Noted	The cited reference is a direct quote from 44 CFR Part 350. It is FEMA's intention to respond in a timely manner.
I.C.2 Specific FEMA Review and Approval Procedures					
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0129-008	Wisconsin Emergency Management, Teri Engelhart	Page: I-10, Line: 6 -7 Comment: The amount of time for review and approval of the annual plan submittal by FEMA should be specified in this manual. This is so that States can submit their plan at the appropriate time to allow approval before the ALC is due or an exercise will be conducted.	Noted	The cited text is a summary of regulatory language. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

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I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0110-004	Alabama Emergency Management Agency, J Frank Price	page I-10, lines 28-31: After changes are made to a State REP plan, it is submitted to FEMA, if FEMA has problems the new changes will need to be made. REP plans are now part of the STATE EOP in most States and approvals are a long process, having additional for FEMA, which can take months, to approve and then have a requirement about the ALC makes this process a bureaucratic exercise. FEMA can have regular meetings with States about possible changes in case there could be a conflict.	Noted	Yes they can. Please see REP Program Manual Part IV.I, Annual Letter of Certification. Other possibilities include SAV, meeting with RAC Chair, etc.
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0129-007	Wisconsin Emergency Management, Teri Engelhart	Page: I-10, Line: 29 - 39 Comment: More clarification is needed regarding the time sequence between submittal of the plan and submittal of the ALC. Theoretically, any time of the year that the plan is submitted will be "prior" to submittal of the ALC, unless they are submitted together.	Modified	Plans are submitted as part of the annual review cycle, and are reviewed as part of the ALC submission or may be separately submitted during the calendar year based on the ORO's plan update schedule. See Part I.D - Evaluation of Radiological Emergency Preparedness Section 2 - Specific FEMA Review and Approval Procedures.
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0108-010	Louisiana Department of Environmental Quality, Cheryl Chubb	Define "any change." This needs to be defined so that plans are not unnecessarily be sent to FEMA for review.	Modified	.IPlease see REP Program Manual Part IV.O - Annual Letter of Certification. Cited text has been changed to "any significant change." An entry for "significant change" has been added to the glossary (See Appendix B - Glossary of REP Terms).
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0121-012	Utility Radiological Safety Board of Ohio, Nancy Dragani	Terms being used for all phases of an event must be c1arilied since several different terms describing phases are used throughout the proposed guidance.	Modified	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Terminology differs between organization because of each organization's focus and activities. The REP Program Manual has been reviewed whereever the term "phase" is used and has been amended for as much consistency as possible. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases.
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0127-002	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page I-16 Lines 17, 18, 19: Comment: This statement is inaccurate; it overlooks the initial reliance on plant conditions in the prompt development of initial protective actions for the public and does not articulate the goal of preventing or mitigating injury from acute radiation exposure(dose saving) The statement ignores the protective action refinement process that occurs during the early phase. It is blind to the processes of off site emergency response organization mobilization and thus mischaracterizes the offsite response progression during the very early phase (mobilization period) of the early phase where immediate dose savings is the primary protective goal.	Modified	The REP Program Manual has been modified to match EPA-400 language regarding the early plume phase, which includes more details than the original REP Program Manual language. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases.

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I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0109-001	Ottawa County, Ohio, Koch Beth	page 1-16, lines 17-19: The early or plume phase lasts hours to several days and ends when the radioactive release ends. During this time, there will be little or no information available, and protective action decisions (PADs) may be based on incomplete or inaccurate dataCOMMENT: Change “will” to “may”.	Modified	The cited sentence in the REP Program Manual has been replaced with EPA-400 language. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases.
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0109-002	Ottawa County, Ohio, Koch Beth	page 1-16, lines 25-27: The intermediate or ingestion and relocation phase can last for a number of weeks or months. Because more complete and accurate data will be available during this phase, protective actions will be more restrictive.COMMENT: Change “will” to “may”.	Modified	Protective actions will likely be more restrictive in this phase in order to protect the health and safety of the public. The existing REP Program Manual language is sufficient. The cited language has been replaced with information directly quoted from EPA-400. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases.
I.C.2 Specific FEMA Review and Approval Procedures	FEMA-2008-0022-0127-003	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page I-16 Lines 25, 26: Comment: The ingestion pathway protective action goals are missed or mischaracterized here. The ingestion pathway goals are to characterize the extent of any radioactive materials that have been released to the environment, determine based on that characterization the effectiveness of initial and subsequent protective actions and if need be modify those actions to reflect long term dose savings to the public through food agricultural and milk pathway restrictions and relocations if needed.	Modified	This is introductory information. The cited sentence in the REP Program Manual has been replaced with EPA-400 language. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases. The detailed discussion of the ingestion pathway phase is found in Evaluation Criterion J.11 in Part II.C - Planning Guidance.
I.D.3 Protective Action Guides					
I.D.3 Protective Action Guides	FEMA-2008-0022-0121-023	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: I-16 Line: 17-24 Comments: The State of Ohio assumes that any references to EPA-400-R-92-001 will be changed once the new EPA-400 is released. he State of Ohio does not believe the new PAG manual has a PAG for thyroid that initiates evacuation . Will they update this then the the new EPA manual is issued?	Noted	Yes, the REP Program Manual will be updated as appropriate when the new EPA-400 is finalilzed.
I.D.3 Protective Action Guides	FEMA-2008-0022-0121-006	Utility Radiological Safety Board of Ohio, Nancy Dragani	Will the references to EPA-400-R-92-00 1 be changed once the new EPA-400 is released?	Noted	Yes. The REP Program Manual will be updated as appropriate when the new EPA-400 is finalilzed.

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Part II. REP Program Planning Guidance					
II. REP Program Planning Guidance	FEMA-2008-0022-0111-010	Illinois Emergency Management Agency, Andrew Velasquez	IEMA recommends that Section II, REP Program Planning Guidance be completely deleted.	Rejected	The comment is inconsistent with FEMA policy and best practices.REP Program Manual, Part II - REP Program Planning Guidance is the primary source of guidance for OROs for reviewing, revising, and developing radiological emergency response plans based on the Planning Standards from NUREG-0654/FEMA-REP-1.
II. REP Program Planning Guidance	FEMA-2008-0022-0111-003	Illinois Emergency Management Agency, Andrew Velasquez	IEMA's third comment is to recommend that section II of the REP Program Manual be deleted because it is overly prescriptive and prohibits innovation and the inclusion of advanced technologies. Currently the planning guidance in NUREG-0654 and its associated criterion provide an adequate basis for emergency planning. Section II of the REP Program Manual contains a level of detail more appropriate for procedures. For example, in NUREG-0654, Criterion 1-7 through I-II specify the need for radiological field monitoring to perform accident assessment. The FEMA REP Manual goes into great detail directing ORO's in team deployment, types of equipment and procedures needed. These details are inappropriate in an emergency plan.	Rejected	The comment is inconsistent with FEMA policy or best practices. The REP Program Manual guidance refers to "plans/procedures" specifically to allow for flexibility regarding whether procedures are incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO (See Part 1.B - Scope). Furthermore, the guidance in the REP Program Manual represents a Federally-approved method for meeting the intent of this criterion. The REP Program Manual does not prohibit advanced technology. Alternative approaches are permitted. Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.
II. REP Program Planning Guidance	FEMA-2008-0022-0095-005	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Section II of the REP Program manual is overly prescriptive. NUREG-0654 outlined 16 very broad planning criteria that needed to be addressed in order to develop and implement a comprehensive response plan that meets the regulatory requirements. The value in leaving the language of those criteria in more general terms allows state, local and tribal response agencies to develop a response plan based on the unique characteristics of the region and the laws and regulations governing the response. Section II of the REP manual attempts to provide too great a level of detail in discussing the intent of the criteria. In fact, some of the discussion is clearly beyond the intent of the regulatory requirements NRC promulgated. The explanations within this section go well beyond the intent of the NUREG-0654 criteria and eliminate much of the flexibility built into NUREG-0654. Further, the level of detail stifles innovation in the planning process. The level of detail does not allow for the incorporation of new technologies to meet the criteria and will become outdated sooner rather than later. The details provided may be valuable in assessing whether a plan meets the required criteria but limit flexibility and innovation at the planning level for all levels of government.	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.

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II. REP Program Planning Guidance	FEMA-2008-0022-0098-005	Kansas Department of Health and Environment, Thomas Conley	Section II of the REP Program manual is overly prescriptive. NUREG-0654 outlined 16 very broad planning criteria that needed to be addressed in order to develop and implement a comprehensive response plan that meets the regulatory requirements. The value in leaving the language of those criteria in more general terms allows state, local and tribal response agencies to develop a response plan based on the unique characteristics of the region and the laws and regulations governing the response. Section II of the REP manual attempts to provide too great a level of detail in discussing the intent of the criteria. In fact, some of the discussion is clearly beyond the intent of the regulatory requirements NRC promulgated. The explanations within this section go well beyond the intent of the NUREG-0654 criteria and eliminate much of the flexibility built into NUREG-0654. Further, the level of detail stifles innovation in the planning process. The level of detail does not allow for the incorporation of new technologies to meet the criteria and will become outdated sooner rather than later. The details provided may be valuable in assessing whether a plan meets the required criteria but limit flexibility and innovation at the planning level for all levels of government.	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.

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II. REP Program Planning Guidance	FEMA-2008-0022-0095-003	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	There is conflicting language between NRC and FEMA regarding the purpose and intent of NUREG- 0654, Rev 1. The NRC has always maintained that NUREGs are not a substitute for regulations. SECY-08-0182 states that NUREG-0654/FEMA-REP-1, Rev. 1 does not contain NRC regulations or requirements. NRC Regulatory Guide 1.101, Revision 4 states that NUREG-0654 is an acceptable means for showing compliance with NRC's regulations for emergency preparedness. However, the Federal Register notice (May 18, 2009) states, "...As such, the criteria established in NUREG-0654 are binding upon both NPP licensees and the OROs responsible for offsite emergency preparedness planning in the areas surrounding the NPP." The language as written in the federal register notice is in direct conflict with the NRC's interpretation as stated above. NUREG-0654/FEMA-REP-1, Rev. 1 should remain a guidance document appropriate to demonstrate compliance but should not be strictly interpreted to be binding as written. Each NPP offsite emergency response plan is unique in that the state and local jurisdictional laws and regulations may necessitate modifying the criteria outlined in thefederal guidance in order to meet the intent of the regulation and remain within the state and local regulatory framework. NUREG-0654 should continue to be flexible in its application to allow state and local agencies to continue this practice. The goal is to meet the intent of the regulations in order to provide reasonable assurance of adequate protection of public health and safety.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of the regulations as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0098-003	Kansas Department of Health and Environment, Thomas Conley	There is conflicting language between NRC and FEMA regarding the purpose and intent of NUREG- 0654, Rev 1. The NRC has always maintained that NUREGs are not a substitute for regulations. SECY-08-0182 states that NUREG-0654/FEMA-REP-1, Rev. 1 does not contain NRC regulations or requirements. NRC Regulatory Guide 1.101, Revision 4 states that NUREG-0654 is an acceptable means for showing compliance with NRC's regulations for emergency preparedness. However, the Federal Register notice (May 18, 2009) states, "...As such, the criteria established in NUREG-0654 are binding upon both NPP licensees and the OROs responsible for offsite emergency preparedness planning in the areas surrounding the NPP." The language as written in the federal register notice is in direct conflict with the NRC's interpretation as stated above. NUREG-0654/FEMA-REP-1, Rev. 1 should remain a guidance document appropriate to demonstrate compliance but should not be strictly interpreted to be binding as written. Each NPP offsite emergency response plan is unique in that the state and local jurisdictional laws and regulations may necessitate modifying the criteria outlined in thefederal guidance in order to meet the intent of the regulation and remain within the state and local regulatory framework. NUREG-0654 should continue to be flexible in its application to allow state and local agencies to continue this practice. The goal is to meet the intent of the regulations in order to provide reasonable assurance of adequate protection of public health and safety.	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.
II. REP Program Planning Guidance	FEMA-2008-0022-0101-002	Florida Division of Emergency Management, Michael Younger	FEMA should clearly state its intent for how the RPM's explanations of the criteria will be used to determine the adequacy of plans, procedures and exercises, and explicitly describe its relationship to NUREG-0654. There is a significant amount of ambiguity as to whether the RPM is a compilation of current best practices and recommendations, or whether its contents are legally binding regulatory requirements.	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0102-017	Entergy Nuclear Operations, Inc., Michael Slobodien	This document should state how the REP Manual will be used by FEMA to determine the adequacy of plans, procedures and exercises, and explicitly describe its relationship to NUREG-0654. There is confusion whether the REP Program manual is a compilation of current “best practices” and recommendations, or whether its contents are legally binding regulatory requirements. We recommend that FEMA add this clarification toPart I of the REP Program Manual.	Accepted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in REP Program Manual Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
II. REP Program Planning Guidance	FEMA-2008-0022-0129-001	Wisconsin Emergency Management, Teri Engelhart	How strongly will suggested Plans and Procedure content be viewed as necessary or required in our documents.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of the regulations as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0111-001a	Illinois Emergency Management Agency, Andrew Velasquez	IEMA's first comment is that the Nuclear Regulatory Committee (NRC) and the Federal Emergency Management Agency (FEMA) must agree on the purpose ofNUREG-0654, Rev. 1. In the past, the NRC has always clearly indicated that NUREGs are not a substitute for theregulations. The most recent example of this is the Commissioner voting record from SECY-080182 that states: "NUREG-0654/FEMA-REP-l, Rev. 1 does not contain NRC regulations or requirements. Regulatory Guide 1.101, Revision 4, "Emergency Planning and Preparedness for Nuclear Power Reactors," issued July 2003 (ML032020276) identifies it as an acceptable method for showing compliance with the Commission's emergency preparedness regulations. The NRC uses the methods described in this guide, includingNUREG-0654/FEMA-REP-1, Rev. 1, to evaluate emergency plans for nuclear power reactors. As with all NRC regulatory guidance, compliance is not required and applicants or licensees rnay propose alternative methods of complying with the requirements. Similarly, the NRC recognizes that FEMA may find alternatives used by State and local governments to be acceptable means for	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.
II. REP Program Planning Guidance	FEMA-2008-0022-0111-001b	Illinois Emergency Management Agency, Andrew Velasquez	(continued)meeting the planning standards and the evaluation criteria in NUREG-0654/FEMA-REP-l, Rev. I."Contrary to the above interpretation, FEMA states the following from Federal Register, May 18, 2009, Volume 74, Number 94: "The NRC and FEMA have also developed a number of evaluation criteria that the agencies used to determine compliance with each of the 16 planning standards. Those evaluation criteria are contained in NUREG-0654 which is incorporated by reference into FEMA's regulations at 44CFR, Part 350, as well as contained in NRC regulations at 10CFR, Part 50. As such, the criteria established in NUREG-0654 are binding upon both NPP licensees and the OROs responsible for offsite emergency preparedness planning in the areas surrounding the NPP."The obscure language in the FEMA Federal Register notice implies NUREG-0654 is regulation contrary to the NRC's interpretation, therefore, IEMA recommends that FEMA add a statement to the REP manual similar to the one the NRC used in SECY-08-0182		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0111-004a	Illinois Emergency Management Agency, Andrew Velasquez	IEMA's concern is that once adopted, the REP Manual will become defacto regulations. This approach extends FEMA's influence far beyond regulatory requirements of those necessary to make a "reasonable assurance" finding that adequate protective measures can and will be taken in the event of an emergency. The standards by which the plans are developed, evaluated and maintained are firmly established in Part 350, IOCFR50.47 and NUREG-0654/FEMA-REP-I, Rev. I as adopted through the Administrative Rules process. Historically, FEMA has always allowed some latitude in interpreting the language of NUREG-0654/FEMA-REP-I, Rev. I. State and local governments have the knowledge, experience and technical basis necessary to determine what level of detail constitutes an acceptable emergency plan for their jurisdiction.What FEMA proposes under its draft REP Planning Guidance is to implement the guidance as policy. As stated on page I-I of the REP Manual. "This manual is intended to be the principal source of policy and guidance for the Department of Homeland Security (DHS) and FEMA's Radiological Emergency Preparedness (REP) Program." FEMA states on Page II-I	Noted	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.
II. REP Program Planning Guidance	FEMA-2008-0022-0111-004b	Illinois Emergency Management Agency, Andrew Velasquez	(continued)that the revised guidance is "intended for use by FEMA staff members responsible for evaluating plans and procedures and by other Federal Staff who assist FEMA as members o the RACs." There should be a difference between policy guidance and evaluation guidance. It appears FEMA it trying to combine the two.It can be inferred from the proposed revisions that any plan that fails to address the NUREG0654/ FEMA-REP-I, Rev. I criteria in the manner strictly defined and established by FEMA in the draft REP Planning Guidance would be deemed "inadequate". Such was NOT the intent of the original NUREG0654/ FEMA-REP-I, Rev. I criterion. That document set forth 16 broad minimum planning standards aimed at allowing states and local government's flexibility in addressing the basic emergency preparedness requirements for their unique geographic and political jurisdiction. The proposed cumbersome prescriptive draft guidance would require more time, manpower and money from State and local agencies trying to comply with this "guidance."		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0093-004	Texas Department of State Health Services, Bob Free	The draft REP Guidance describes its contents as being "guidance". This should be included in FEMA policy as a requirement for FEMA regions. The use of the REP Guidance by FEMA Regions should be restricted to review of exercise performance and general planning requirements contained in NUREG 0654/FEMA REP 1 using the REP Guidance Manual as a guide rather than prescribing content of plans in detail.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of the regulations as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.
II. REP Program Planning Guidance	FEMA-2008-0022-0093-009	Texas Department of State Health Services, Bob Free	Part II.A.1: Page II-1, Lines 4-5 The following statement should be revised: This part of the Radiological Emergency Preparedness (REP) Program Manual NUREG-0654/FEMA-REP-1 is the primary source of guidance pertaining to radiological emergency response planning. The guidance in this part of the REP Manual provides greater detail to NUREG-0654 Planning Standards and is intended for use by offsite response organizations (OROs) for reviewing, revising, and, if necessary, developing radiological emergency plans/procedures in support of the licensing and maintenance of a license for commercial nuclear power plants (NPPs). While it is true that Guidance memoranda were generated to provide supplementary guidance to jurisdictions for implementation of the "requirements" of NUREG 0654/FEMA-REP-1, the memoranda are guidance written to assist in the writing, development and evaluation of REP plans and exercises. The REP manual was written to incorporate this guidance and provide additional guidance. It has been used by FEMA as a rule rather than a guide. Neither 44CFR 350, the FEMA MOU with the Nuclear Regulatory Commission (NRC) nor the REP guidance provide FEMA with regulatory authority to prescribe the contents of jurisdictions' Radiological Emergency Response plans. The document needs to be very clear in that respect. The use of this guidance by FEMA Regions should be restricted to review of performance and the elements of 0654 rather than prescribing content of plans.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. REP Program Planning Guidance	FEMA-2008-0022-0093-007	Texas Department of State Health Services, Bob Free	Part I.A: Page I-2, Lines 1-2 The following statement should be revised: In Part II the reader will find the Planning Standards, along with expansive explanations and guidance on materials to be included in ORO plans and procedures that OROs should include in their plans and procedures. Lines 3-4 state that Part II is solely meant to provide guidance. The above sentence, if left as originally written, indicates a mandatory requirement, not guidance.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of the regulations as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.
criterion applicability					
criterion applicability	FEMA-2008-0022-0097-006	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Rep Program Manual Language/ Reference: Part II.C (through out): Although this criterion is applicable to the following plans/ procedures, FEMA intends for this guidance to apply only to OROs. Licensee X State X Local XCOMMENT: Remove statement.BASIS: Statement of application contradicts the checking off of all three affected entities and causes confusion. In other instances, the "Licensee" is the only entity checked off (e.g. B.1 through B.9)	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0116-018	Nuclear Energy Institute, Alex Marion	Part II.C (through out): Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs. Licensee_X_ State _X_ Local _X_ Part II.C (through out): Remove statement. Basis: Statement of application contradicts the checking off of all three affected entities and causes confusion. In other instances, the "Licensee" is the only entity checked off (e.g. B.1 through B.9)	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0109-019	Ottawa County, Ohio, Koch Beth	Part II.C: Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs.Licensee_X_ State _X_ Local _X_COMMENT: This is confusing. Delete the comment and continue using "X" to denote who must comply.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0109-003	Ottawa County, Ohio, Koch Beth	PART II: "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs." This is confusing.COMMENTThis is confusing. Delete the comment and continue using "X" to denote who must comply.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
criterion applicability	FEMA-2008-0022-0020-001	Ashtabula County EMA, George Rolland	Blanket comment for entire Part II of the document. Each Criterion denotes beneath it with a X as to whom it applies: Licensee, State, Local. However, each Criterion also says "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs." This is confusing. Suggest delete the comment and let the X show to whom it applies.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0021-001	Geauga County DES, Dale Wedge	Blanket comment for entire Part II of the document. Each Criterion denotes beneath it with a X as to whom it applies: Licensee, State, Local. However, each Criterion also says "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs." This is confusing. Suggest delete the comment and let the X show to whom it applies.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0036-001a	Lake County EMA, Larry Greene	Blanket comment for entire Part II of the document. Each Criterion denotes beneath it with a X as to whom it applies: Licensee, State, Local. However, each Criterion also says "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs." This is confusing. Suggest delete the comment and let the X show to whom it applies.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0042-003	Ned Wright	The comment: “Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs.” Should be used only once in the introduction and not for every criterion—it gets too annoying.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0073-008	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: Blanket comment for entire Part II of the document. "Each Criterion denotes beneath it with a X as to whom it applies: Licensee, State, Local. However, each Criterion also says "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs.” This is confusing. Suggest delete the comment and let the X show to whom it applies. If FEMA is concerned that without the statement that there are some who may feel the need to oversee the NPP, perhaps a more effective method would be to include this type of statement at the beginning of the section. Besides, we all know that FEMA only oversees the State and Locals.Potential Impact: Causes confusion between what the statement says and what is indicated at the bottom of each criterion as to whom it applies to. Recommend using the statement once in the beginning of the document.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
criterion applicability	FEMA-2008-0022-0079-003	Delaware Emergency Management Agency, James Turner	Entire Part II Issue: States Although this criterion is applicable to the following plans/procedures. FEMA intends for this guidance to apply only to OROs Basis/Comment: This is confusing. Suggest delete the comment and let the X show to which it applies. Licensee, State and Local are all marked at times with an X at times.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0086-002	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Draft REPP Manual Referenced Section(s): Part II Comments: Each criterion each organization listed with an "X" if the criterion applies. However, there is also a general statement, "Although this criterion is applicable to the following plans/procedures, FEMA intends [or this guidance to apply only to OROs". This statement is contradictory and confusing, particularly under Planning Standard B - On-Site Emergency Organization, and other sections intended for licensees only. We recommend the general statement in quotations be deleted throughout the REP Manual.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0087-013	South Carolina Emergency Management Division, Danny Loomis	Throughout Part II: The phrase "FEMA intends for this guidance to apply only to ORO's". I would suggest clarifying what is meant in each of those locations, as it tends to confuse the issue being addressed each time.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0093-010	Texas Department of State Health Services, Bob Free	Part II.C: Remove Last statement of each NUREG Criteria in Part II.C “Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs”. The above statement is not necessary for each NUREG Criterion. It is clearly stated on page II-2 in lines 6-7 before each criterion is addressed.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0098-018	Kansas Department of Health and Environment, Thomas Conley	The redundant statement “FEMA intends for this guidance to apply only to ORO’s” and thedesignation organization block below every criterion is confusing and clearly wrong at numerouslocations in this draft. This needs to be re-evaluated for consistency.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0101-003	Florida Division of Emergency Management, Michael Younger	The use of the phrase “Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs” throughout the manual is redundant. This statement can be made once to clarify the intent of the RPM.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
criterion applicability	FEMA-2008-0022-0102-018	Entergy Nuclear Operations, Inc., Michael Slobodien	Each criterion has the organization(s) listed with an “X” if the criterion applies. However, there is also a general statement, “Although this criterionis applicable to the following plans/procedures,FEMA intends for this guidance to apply only toOROs”. This statement appears contradictory, particularly under Planning Standard B – On-Site Emergency Organization. We suggest deleting the general statement throughout the document.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0106-044	Nebraska Emergency Management Agency, Jonathan Schwarz	Under each Criterion in Part II there is the statement "Although this criterion is applicable to the following plans/procetures, FEMA intends for this guidance to apply only to OROs". FEMA can not intend one way or another as it is where the "X" is located in NUREG 0654/REP-1 which determines who the Criterion applies to. Delete this statement under each criterion.Potential Impact: Creates confusion as to which criterion is applicable to what agency.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0108-017	Louisiana Department of Environmental Quality, Cheryl Chubb	Here is the first incident of "FEMA intends for this guidance to apply only to OROs." Every single criterion after this states the same thing. Put this statement once, at the beginning of the manual. Worse case, add it to the summary at the beginning of each Planning Standard (A, B, C...). It can be a confusing statement.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0130-005	State of Vermont, Barbara Farr	Entire Part II states: “although this criterion is applicable only to the following plans / procedures, FEMA intends that this guidance apply only to ORO’s.”Basic CommentsDoes this apply to Onsite Response Organization or Offsite Response Organization? Suggest deleting the comment and let the “X” show to which it applies. Licensee, State, and Local are all marked with an “X” at times.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0117-017	California Emergency Management Agency, Elaine Jennings	Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs (and throughout the criterions)Comments: This phase or slightly similar is repeated throughout the NUREG Criterion explanations in the book. It should only be mentioned once.explanation/RecommendatioN: Mention this phrase once in section IIA, making it universal for all the criterion, and delete it from the rest of section IIC in the document.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0129-036	Wisconsin Emergency Management, Teri Engelhart	Section III. Following each Evaluation Area sub-element is a statement that activities should be based on the plans and procedures, "unless noted above," or "in the extent-of-play agreement." This could allow for the evaluation of criteria without regard for approved plans and procedures. Please consider removing the phrase, "unless noted above" from all criteria.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
criterion applicability	FEMA-2008-0022-0120-002	Alabama Emergency Management Agency, La'Tonya Stephens	After each NUREG Criterion in Part II the statement “Although this criterion is applicable to the following plans/procedures, FEMA intend for this guidance to apply only to OROs” the Xs by Licensee, State, and Local are not supporting that. Example II-17 is marked only Licensee and II-5 all entities are marked.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0128-001	San Luis Obispo County Office of Emergency Services , Ron Alsop	Statement of application contradicts the checking off of all three affected entities and causes confusion. In certain instances, the “Licensee” is the only entity checked off yet the above statement is still included.Explanation/RecomendationRemove statement or only include it in sections where only State and Local are checked.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0113-001	North Carolina Division of Emergency Management, Stephen Payne	1. REP PROGRAM MANUAL LANGUAGE/REFERENCEGENERAL ITEM: Use of the statement: “Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs.”RECOMMENDATION/COMMENT: DELETE THIS STATEMENTBASIS:This statement is applied using a “shotgun” approach to ALL NUREG Criterion listed in this document. Application of this statement needs to be more closely reviewed to so that it applies to only the applicable ORO criterion. As currently written, ALL NUREG Criterion ,to include all of section B for the Utilities, apply equally to Utility, State & Local response organizations, there is no delineation between Licensee or ORO criterion.	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0121-009	Utility Radiological Safety Board of Ohio, Nancy Dragani	For the entire Part II: criterion denotes beneath it with a "X" as to whom it applies: Licensee, State, Local. However, each criterion also states: "Although this criterion is applicable to the following plan s/procedures, FEMA intends for this guidance to apply only to ORO's." This is confusing especially when the "X" is denoted for the Licensee; to whom does the criterion apply?	Modified	The REP Program Manual has been amended. The statement is now part of the criterion citation and uses the exact language from NUREG-0654/FEMA-REP-1, "Applicability and Cross Reference to Plans: Licensee__ State__ Local__" See Part II.C: Planning Guidance for the updated and consistent format.
criterion applicability	FEMA-2008-0022-0108-179	Louisiana Department of Environmental Quality, Cheryl Chubb	Comment: Every criterion has something to the equivalent of "All activities should be based on the ORO's plans and/or procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent-of-play agreement." Can this be stated once in section C or does it need to be noted for every criterion?	Modified	The REP Program Manual has been amended to use the same closing statement throughout the evaluation area criteria. OROs may decide where the statement will appear in their after action report. See Part II.C: Planning Guidance for the updated and consistent format.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
references					
references	FEMA-2008-0022-0128-003	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-5, lines 9-14: References:1. National Incident Management System, December 2008.2. National Response Framework, January 2008.3. National Response Framework, Nuclear/Radiological Incident Annex, June 2008.4. Comprehensive Preparedness Guide 101: Developing and Maintaining State, Territorial, Tribal, and Local Government Emergency Plans, March 2009.COMMENTs: The NUREG criterions predate all of the listed references. The way they are presented indicates the criterion come from the referenced documents which they do not. Many of the criterions were used as basis for the drafting of the cited documents. As they are presented, they add no value to interpreting or understanding the criterion.Explanation/Recomendation: Remove the references cited throughout section IIC for NUREG Criterion. If you feel justified in including the post 9/11 documents do so in section IIA and delete all the references from section IIC. Later references to documents that are the source of the item referenced should remain. Emphasis should be to include REP specific guidance not found in other documents and guidance.	Rejected	The references cited support the specific topic discussed in the explanation. They refer the reader to sources of additional information that may provide more up-to-date guidance or information on non-REP specific, national-level emergency preparedness documents.
Planning Standard A					
Criterion A.1.a					
Criterion A.1.a	FEMA-2008-0022-0097-017	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-4, Line 28-34 Planning guidance that is provided in the National Response Framework and its components should not be included in the REP Program Manual. The REP Program Manual should only include planning guidelines and expectations that are unique to NPP radiological incidents and are otherwise not covered by the NRF and its components.	Rejected	The commenter's suggestion is against FEMA policy and best practices. The NRF is a guide to how the Nation conducts all-hazards response. As the nation's ultimate guiding document for all-hazard emergencies, REP must align with the NRF. The NRF has the Nuclear-Radiological Incident Annex and the REP Program Manual aligns with this policy. The intent of the REP Program Manual is to serve as a national comprehensive desk reference for all REP stakeholders. It must reference, integrate, and/or be consistent with the national preparedness systems and doctrines (i.e. NRF, NIMS, ICS, HSEEP).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.a	FEMA-2008-0022-0109-018	Ottawa County, Ohio, Koch Beth	page II-4, lines 28-34: Although HSPD-5 does not require the adoption of NIMS for those State, local, and tribal governments who do not seek Federal preparedness grants, the integration of NIMS/ICS into ORO emergency plans for NPPs will provide greater consistency across response jurisdictions and facilitate integration of response elements during a “non-traditional” event at a nuclear facility (e.g., HAB event, catastrophic natural event). During such events, the OROs would establish an Incident Command Post (ICP) to facilitate the coordination and subsequent response operations between multi-jurisdictional organizations, i.e., both onsite and offsite organizations.COMMENTNational Response Framework and the Target Capabilities comprise the universal emergency preparedness guidelines. Planning guidance that is provided in the National Response Framework and its components should not be included in the REP Program manual. The REP Program Manual should include only the planning guidelines and expectations that are unique to NPP radiological incidents and are otherwise not covered by the NRF and its components.	Rejected	The commenter's suggestion is against FEMA policy and best practices. The NRF is a guide to how the Nation conducts all-hazards response. As the nation's ultimate guiding document for all-hazard emergencies, REP must align with the NRF. The NRF has the Nuclear-Radiological Incident Annex and the REP Program Manual aligns with this policy. The intent of the REP Program Manual is to serve as a national comprehensive desk reference for all REP stakeholders. It must reference, integrate, and/or be consistent with the national preparedness systems and doctrines (i.e. NRF, NIMS, ICS, HSEEP).
Criterion A.1.a	FEMA-2008-0022-0097-015	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-4, Line 28-34:Although HSPD-5 does not require the adoption of NIMS for those State, local, and tribal governments who do not seek Federal preparedness grants, the To be NIMS compliant, impliescompliance with broader emergency preparedness provisions that are universal and applicable to a scalable response National Response Framework and the Target Capabilities comprise the universal emergency preparedness guidelines. Planning guidance that is provided in theNational Response Framework and its integration of NIMS/ICS into OROemergency plans for NPPs will provide greater consistency across response jurisdictions and facilitate integration of response elements during a “nontraditional” event at a nuclear facility(e.g., HAB event, catastrophic natural event). During such events, the OROs would establish an Incident Command Post (ICP) to facilitate the coordination and subsequent response operationsbetween multi-jurisdictional organizations, i.e., both onsite and offsite organizations.	Rejected	The commenter's suggestion is against FEMA policy and best practices. The NRF is a guide to how the Nation conducts all-hazards response. As the nation's ultimate guiding document for all-hazard emergencies, REP must align with the NRF. The NRF has the Nuclear-Radiological Incident Annex and the REP Program Manual aligns with this policy. The intent of the REP Program Manual is to serve as a national comprehensive desk reference for all REP stakeholders. It must reference, integrate, and/or be consistent with the national preparedness systems and doctrines (i.e. NRF, NIMS, ICS, HSEEP).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.a	FEMA-2008-0022-0106-012	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 4Comment: Ref I.C.II.a, line 11, words 5-7: A “catastrophic natural event” is changing the intent of the REP Program to an “All Hazard” evaluation by FEMA REP evaluators. Although FEMA Regions are capable of evaluating “All Hazards” it is doubtful that the FEMA REP Program and contractors would be effective evaluators unless augmented by FEMA Regional staff with a background in “All Hazards” planning and evaluation.Potential Impact: Un-trained evaluators, whether from FEMA REP Program staff or contract staff would not meet the intent of the National Evaluation Program (NEP) and fail to provide valid evaluation of OROs performing in accordance with State of Nebraska requirements provided through NEMA.	Noted	The cited REP Program Manual text is suggesting that natural disasters could be initiating events for radiological incidents. Evaluation of the all-hazard response to such incidents is not evaluated, only the response to the REP consequences. Evaluation of all-hazards exercises is outside the scope of the REP Program Manual. However, all FEMA evaluators are being trained to the NEP standards for exercise evaluation.
Criterion A.1.a	FEMA-2008-0022-0080-002	Douglas Fleck	Page II-4, Line 31 uses the term “non-traditional” event. This is a poor choice of words as it implies leaks from containment, failure of safety systems, seismic events, etc., are somehow “traditional” or “normal” by comparison. In the interest of public perception I recommend that the term “event” be used to describe all such instances.	Modified	The REP Program Manual has been amended throughout to replace the term "non-traditional event" with "incident."
Criterion A.1.a	FEMA-2008-0022-0100-003	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-4, Line 31 uses the term “non-traditional” event. In the interest of public perception, it is recommend that the term “event” be used to describe all such instances or the term “non-traditional” should be better defined.	Modified	The REP Program Manual has been amended throughout to replace the term "non-traditional event" with "incident."
Criterion A.1.a	FEMA-2008-0022-0080a-002	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-4, Line 31 uses the term “non-traditional” event. This is a poor choice of words as it implies leaks from containment, failure of safety systems, seismic events, etc., are somehow “traditional” or “normal” by comparison. In the interest of public perception I recommend that the term “event” be used to describe all such instances.	Modified	The REP Program Manual has been amended throughout to replace the term "non-traditional event" with "incident."
Criterion A.1.a	FEMA-2008-0022-0121-025	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-4 Line: 16 Comments: Remove the word "as".	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion A.1.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs					
NIMS requirement for OROs	FEMA-2008-0022-0101-013	Florida Division of Emergency Management, Michael Younger	Page II-4, lines 8-11 and 23-24 As noted in the planning standard interpretation, HSPD- 5 requires adoption of NIMS by state, local or tribal governments should they seek federal preparedness grants. However, inclusion of NIMS compliance into criterion A.1.a would mandate ORO plans to be NIMS compliant regardless of whether they seek federa lpreparedness grants. NIMS compliance should remain optional for any such agency, and any mandate for NIMS compliance under NUREG-0654 overrides the scope of HSPD-5 and is not appropriate. Revision of criterion A.1.a is not the appropriate place to mandate implementation of NIMS as it is already required, as appropriate, by HSPD 5.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
NIMS requirement for OROs	FEMA-2008-0022-0101-090	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5) As noted in the planning standard interpretation contained in the FEMA RPM, HSPD-5 requires adoption of NIMS by state, local or tribal governments should they seek federal preparedness grants. However, inclusion of NIMS compliance into criterion A.1.a would mandate ORO plans to be NIMS compliant regardless of whether they seek federal preparedness grants. NIMS compliance should remain optional for any such agency, and any mandate for NIMS compliance under NUREG-0654 overrides the scope of HSPD-5 and is not appropriate. Revision of criterion A.1.a is not the appropriate place to mandate implementation of NIMS as it is already required, as appropriate, by HSPD 5. The sentence “ORO plans shall be compliant with the National Incident Management System (NIMS)” should be deleted.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

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NIMS requirement for OROs	FEMA-2008-0022-0116-017	Nuclear Energy Institute, Alex Marion	Further, to be NIMS compliant, implies compliance with broader emergency preparedness provisions that are universal and applicable to a scalable response to all emergencies or all potential hazards. Many changes or additions to this program manual are imposing new requirements and expectations that reach far beyond planning and responding to the unique aspects of a radiological event at a NPP (i.e. a "REP event"). NEI believes that these new requirements were likely promulgated from Hurricane Katrina lessons learned and now reside in the REPP Manual, subjecting OROs to evaluation against these generic emergency response elements.	Noted	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance. OROs are not evaluated on NIMS compliance during REP exercises.
NIMS requirement for OROs	FEMA-2008-0022-0117-006	California Emergency Management Agency, Elaine Jennings	Page II-5 – The NIMS/ICS section on page 4 clarified that NIMS compliance is not required for government agencies that do not seek Federal preparedness grants. Why include this discussion if FEMA intends to mandate NIMS compliance in Criterion A.1.a? The addition is in conflict with earlier discussion on page 4. Recommend removing the NIMS compliance discussion on page 4.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

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NIMS requirement for OROs	FEMA-2008-0022-0078-005	Minnesota Homeland Security and Emergency Management, kevin Leuer	The existing guidance puts the entire response decision making for response for hostile action events at the command post and does not interface with NIMS and the role of the local and state EOC's. This emphasis is not consistent with current plans and procedures. Most of the current REP response plans do not involve a command post at the site and the plans need to be updated to incorporate the role of the command post, define roles and responsibilities during hostile action events ahead of conducting exercises. The requirement should be to develop and integrated hostile action response plan first and then exercise the plan.	Noted	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance. OROs are not evaluated on NIMS compliance during REP exercises.
NIMS requirement for OROs	FEMA-2008-0022-0098-010	Kansas Department of Health and Environment, Thomas Conley	The REP program manual makes numerous references to being NIMS compliant. It remains unclear whether FEMA will make the recommended changes and continue to apply NUREG-0654, FEMAREP- 1, Rev 1, Supplement 4 and the REP program manual as guidance or policy/regulation that is enforceable and binding. HSPD-5 requires state, tribal and local governments to be NIMS compliant as a condition of receiving grants from the DHS. However, there is no regulatory requirement for those agencies to become NIMS compliant if there are no grant applications. Therefore, the guidance cannot enforce NIMS compliance without a change to regulatory basis. It is our understanding that NIMS compliance is still an optional condition based upon receipt of grant funds from DHS. The wording throughout the document needs to be changed to recommend compliance for consistency and to facilitate implementation but cannot require compliance without regulatory authority.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0095-010	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	The REP program manual makes numerous references to being NIMS compliant. It remains unclear whether FEMA will make the recommended changes and continue to apply NUREG-0654, FEMAREP- 1, Rev 1, Supplement 4 and the REP program manual as guidance or policy/regulation that is enforceable and binding. HSPD-5 requires state, tribal and local governments to be NIMS compliant as a condition of receiving grants from the DHS. However, there is no regulatory requirement for those agencies to become NIMS compliant if there are no grant applications. Therefore, the guidance cannot enforce NIMS compliance without a change to regulatory basis. It is our understanding that NIMS compliance is still an optional condition based upon receipt of grant funds from DHS. The wording throughout the document needs to be changed to recommend compliance for consistency and to facilitate implementation but cannot require compliance without regulatory authority.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
NIMS requirement for OROs	FEMA-2008-0022-0089-002	State of Tennessee Department of Environment and Conservation/ Division of Radiological Health, Bruce House	The State of Tennessee/Department of Environment and Conservation/Division of Radiological Health is opposed to the way that NIMS is adding administrative layers between our state Radiation Control Officer and the State's Emergency Management Decision Makers during fixed nuclear facility exercises. It is crucial that our Radiation Control Officer is able to speak directly to the States Direction and Control Officer during a radiological incident.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. OROs develop their own operational relationships.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0097-016	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-4, Line 28-34:COMMENT: To be NIMS compliant, implies compliance with broader emergency preparednessprovisions that are universal and applicable to a scalable response to all emergencies or all potential hazards. Many changes or additions to this program manual, as part of the NIMS andICS integration are imposing new requirements and expectations that reach far beyond planningand responding to the unique aspects of an event at a NPP that has potential radiological consequences (i.e. a “REP event”). Examples include interoperability of communications, prolonged/protracted staffing and operations, accommodating non-English speaking populations. These should not be included in REP criteria.	Noted	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
NIMS requirement for OROs	FEMA-2008-0022-0117-004	California Emergency Management Agency, Elaine Jennings	This section references the need for ORO’s to establish and ICP to facilitate the coordination and subsequent response operations between multi-jurisdictional organizations. This statement is incomplete and not inclusive of all multi-agency coordination points established during significant events. Explanation There are many coordination points established by ORO’s during events. These include the Incident Command Post (ICP) and emergency operations centers (EOC) at local, regional, and state and federal levels of government. Recommend the expansion of the ICP concept to include the use of appropriate local, state, and federal emergency operations centers as multi-agency coordination points.	Modified	It is not FEMA's intention to duplicate information from NIMS in the REP Program Manual that is not specific to the entities that normally respond in a radiological event. The broader ICS will be tailored to the incident. The sentence "During such events, the OROs would establish an Incident Command Post (ICP) to facilitate the coordination and subsequent response operations between multi-jurisdictional organizations, i.e., both onsite and offsite organizations" has been amended to read, "...the OROs would establish Incident Command to facilitate..." to refer more generally to the incident command system rather than a physical command post. See Evaluation Criterion A.1.a in Part II.C - Planning Guidance.
NIMS requirement for OROs	FEMA-2008-0022-0101-015	Florida Division of Emergency Management, Michael Younger	Page II-4, lines 25-28 It is essential for state, local and licensee plans to be a coordinated planning effort to ensure consistency across all aspects of the response and recovery operations. Suggesting that this sentence be re-written to emphasize the coordination aspect and delete the compatibility reference.	Accepted	The REP Program Manual has been amended as suggested. The word "compatible" has been replaced with "coordinated." See the Explanation section of Evaluation Criterion A.1.a in Part II.C - Planning Guidance.
NIMS requirement for OROs	FEMA-2008-0022-0105-019	Tennessee Emergency Management Agency, Gary Lima	Incorporation of NIMS has been adopted by Tennessee. However, when a REP exercise is conducted the layering of decision making branches has increased the distance to the Direction and Control Officer and the State Radiation Control Officer.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. OROs develop their own operational relationships.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0087-002	South Carolina Emergency Management Division, Danny Loomis	Page 11-4 (A.1.a): REPP on-site and off needs to be NIMS compliant. We endorse this philosophy in South Carolina.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
NIMS requirement for OROs	FEMA-2008-0022-0108-193	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 4 - II - Is it expected that plans/procedures become integrated with and reference ESFs instead of individual agencies?	Noted	Not necessarily. OROs decide how to structure their plans.
NIMS requirement for OROs	FEMA-2008-0022-0098-015	Kansas Department of Health and Environment, Thomas Conley	Page II-4, sentences 10-11, change to read “It is desired that ORO plans be compliant with NIMS.” Rationale: It is not required that state, local, tribal governments be compliant unless they want Federal grants, and they may not. See also general comments on NIMS applicability.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0095-016	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-4, sentences 10-11, change to read "It is desired that ORO plans be compliant with NIMS." Rationale: It is not required that state, local, tribal governments be compliant unless they want Federal grants, and they may not. See also general comments on NIMS applicability.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
NIMS requirement for OROs	FEMA-2008-0022-0064-001	Georgia Environmental Protection Division, Jim Hardeman	Page II-4, lines 8-11: NUREG Criterion A.1.a is misrepresented here. The language here represents how this criterion in NUREG-0654/FEMA-REP-1 would read if NUREG-0654/FEMA-REP-1, Supplement 4 is issued in final without modification. NUREG-0654/FEMA-REP-1, Supplement 4 was issued in draft for review and comment concurrently with the draft Radiological Emergency Preparedness Program Manual – the draft Program Manual, however, makes no reference to Supplement 4, as it does for the "approved" supplements (i.e. 1, 2 and 3). The language in its current form misleads the reviewer, unless he/she is also concurrently reviewing NUREG-0654/FEMA-REP-1, Supplement 4.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0109-016	Ottawa County, Ohio, Koch Beth	Page II-4, lines 10-11: ORO plans shall be compliant with the National Incident Management System (NIMS).COMMENT: NIMS specific references should not be used.	Rejected	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
NIMS requirement for OROs	FEMA-2008-0022-0073-009	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-4Comment: Lines 10-11. Criterion A.1.a. Does the term NIMS Compliant mean the same thing as the definition contained in HSPD,5 and as modified by FEMA's Incident Management Systems Integration (IMSI) Division?Potential Impact: All program participants want to make sure that they only have to comply with one definition of NIMS compliant. Recommend using the same definition as used by the IMSI at FEMA.Comment By: State/Locals	Accepted	The definition of "NIMS compliant" has been added to the REP Program Manual glossary (See Appendix B - Glossary of REP Terms). The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for OROs	FEMA-2008-0022-0106-011	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 4Comment: Ref I.C.II.a, line 4, word 10: What does the word “should” mean with regard to evaluation by FEMA during biennial exercises? Regional FEMA regulators hesitated to define this word.Potential Impact: The interpretation can drastically affect relationships between local, state and Licensees if this word is interpreted as “must”.	Modified	The instance of "should" cited by the commenter is in reference to coordination of offsite response concepts with licensee. With regard to exercise evaluation, the REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
NIMS requirement for OROs	FEMA-2008-0022-0121-024	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-4 Line: 8 through 11 Comments: A.1.a is misleading and incorrect. A.1.a in NUREG-0654 does not contain the last sentence . (Le. NIMS)	Modified	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
NIMS requirement for licensees					
NIMS requirement for licensees	FEMA-2008-0022-0102-046	Entergy Nuclear Operations, Inc., Michael Slobodien	These criteria discuss the descriptions of organizational relationships, concepts of operation and terminology consistent with NIMS. This is shown as applicable to licensees, states and local entities. The licensee block should be N/A.Rationale: NIMS format is appropriate for state and local plans, but is not a requirement for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. Other portions of these criteria refer to NIMS applying to State and local ORO plans.	Modified	Criterion A.1.a is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.
NIMS requirement for licensees	FEMA-2008-0022-0102-047	Entergy Nuclear Operations, Inc., Michael Slobodien	These criteria discuss the descriptions of organizational relationships, concepts of operation and terminology consistent with NIMS. This is shown as applicable to licensees, states and local entities. The licensee block should be N/A.Rationale: NIMS format is appropriate for state and local plans, but is not a requirement for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. Other portions of these criteria refer to NIMS applying to State and local ORO plans.	Modified	Criterion A.1.a is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.

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NIMS requirement for licensees	FEMA-2008-0022-0102-048	Entergy Nuclear Operations, Inc., Michael Slobodien	These criteria discuss the descriptions of organizational relationships, concepts of operation and terminology consistent with NIMS. This is shown as applicable to licensees, states and local entities. The licensee block should be N/A.Rationale: NIMS format is appropriate for state and local plans, but is not a requirement for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. Other portions of these criteria refer to NIMS applying to State and local ORO plans.	Modified	Criterion A.1.a is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.
NIMS requirement for licensees	FEMA-2008-0022-0097-009	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C Criteria A.1.a COMMENT: The criteria refer to formatting descriptions of organizational responsibilities and concepts of operation in NIMS format. This is shown in the guidance as applicable to licensees, states and local entities. The licensee block should be N/A.BASIS: NIMS format is appropriate for state and local plans, but is not appropriate for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. State and local plans are more amenable to an all-hazards approach.	Rejected	Criterion A.1.a is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.
NIMS requirement for licensees	FEMA-2008-0022-0116-021	Nuclear Energy Institute, Alex Marion	Part II. C, Criteria A.1.a, A.1.b and A.1.c: The criteria refer to formatting descriptions of organizational responsibilities and concepts of operation in NIMS format. This is shown in the guidance as applicable to licensees, states and local entities. The licensee block should be N/A.Basis: NIMS format is appropriate for state and local plans, but is not appropriate for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. State and local plans are more amenable to an all-hazards approach.	Rejected	Criterion A.1.a is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.

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NIMS requirement for licensees	FEMA-2008-0022-0102-005	Entergy Nuclear Operations, Inc., Michael Slobodien	Section II a. NIMS/ICS Page 4, Paragraph 3 states: This language should be modified to make it clear that NPP licensees should address the NIMS/ICS compatibility with OROs in connection with Hostile Action Based (HAB) events, not to other radiological emergencies for which licensees use their own onsite response plans and procedures.Rationale: NIMS/ICS is appropriate for offsite State and local response for all-hazards applications; however, licensee radiological emergency response plans are focused on plant events.	Noted	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
NIMS requirement for licensees	FEMA-2008-0022-0108-194	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 4 - II.a - How can an agency be NIMS compliant and still maintain compatibility with licensee plans and procedures when they are not NIMS compliant?	Noted	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
NIMS requirement for licensees	FEMA-2008-0022-0101-084	Florida Division of Emergency Management, Michael Younger	II.a – NIMS/ICS (page 4) It is essential for state, local and licensee plans to be a coordinated planning effort to ensure consistency across all aspects of the response and recovery operations. Suggesting that this sentence be re-written to emphasize the licensee and ORO coordination and communication aspect and delete the compatibility reference.	Accepted	The REP Program Manual has been amended as suggested. The word "compatible" has been replaced with "coordinated." See the Explanation section of Evaluation Criterion A.1.a in Part II.C.

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NIMS requirement for licensees	FEMA-2008-0022-0097-008	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.II-4, (lines 23-34):The referenced section implies that the decision by the licensee not to adopt NIMS would be viewed as an impediment to integration of resources.COMMENT: Although the verbiage acknowledges that HSPD5 does not require the licensee to adopt NIMS, the language should be revised tor deleted to remove any suggestion that NIMS is the preferred approach for the licensee. Integration of NIMS/ICS Concepts into ORO plans andprocedures are only applicable to hostile action based events at a nuclear power plant (NPP)BASIS: Improves the clarity of the expectation. The NIMS/ICS concepts are applicable toHAB events at a NPP; it's not applicable to the radiological emergencies (equipment or event based) for which we typically plan. In these events the on-scene response is the licensee's response.	Noted	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
NIMS requirement for licensees	FEMA-2008-0022-0116-020	Nuclear Energy Institute, Alex Marion	Part II.C, A1.a, p.II-4, (lines 23-34): The referenced section implies that the decision by the licensee not to adopt NIMS would be viewed as an impediment to integration of resources. Part II.C, A1.a, p.II-4, (lines 23-34): Although the verbiage acknowledges that HSPD 5 does not require the licensee to adopt NIMS, the language should be revised tor deleted to remove any suggestion that NIMS is the preferred approach for the licensee. Integration of NIMS/ICS Concepts into ORO plans and procedures are only applicable to hostile action based events at a nuclear power plant (NPP)Basis: Improves the clarity of the expectation.	Modified	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
NIMS requirement for licensees	FEMA-2008-0022-0109-005	Ottawa County, Ohio, Koch Beth	page II-4, lines 23-34:COMMENT: Since HSPD5 does not require licenses to adopt NIMS, language should not imply that NIMS is the methodology of choice.	Modified	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

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Criterion A.1.b					
Criterion A.1.b	FEMA-2008-0022-0097-010	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C Criteria A.1.b COMMENT: The criteria refer to formatting descriptions of organizational responsibilities and concepts of operation in NIMS format. This is shown in the guidance as applicable to licensees, states and local entities. The licensee block should be N/A.BASIS: NIMS format is appropriate for state and local plans, but is not appropriate for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. State and local plans are more amenable to an all-hazards approach.	Rejected	Criterion A.1.b is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.
Criterion A.1.b	FEMA-2008-0022-0098-016	Kansas Department of Health and Environment, Thomas Conley	Page II-5, sentence 20, delete the sentence that begins with “The concept…” and ends with“processes of NIMS.” Since an agency does not have to be NIMS compliant this sentence doesn’tfit.	Modified	The cited sentence has been modified to read, "For those OROs that have adopted NIMS, Under NIMS..." The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

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Criterion A.1.b	FEMA-2008-0022-0095-017	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-5, sentence 20, delete the sentence that begins with "The concept…" and ends with "processes of NIMS." Since an agency does not have to be NIMS compliant this sentence doesn't fit.	Rejected	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.1.b	FEMA-2008-0022-0095-018	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-5, sentence 25, delete the words "consistent with NIMS."	Modified	The cited sentence has been modified to read, "For those OROs that have adopted NIMS, Under NIMS..." The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

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Criterion A.1.b	FEMA-2008-0022-0098-017	Kansas Department of Health and Environment, Thomas Conley	Page II-5, sentence 25, delete the words “consistent with NIMS.”	Modified	The cited sentence has been modified to read, "For those OROs that have adopted NIMS, Under NIMS..." The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.1.c					
Criterion A.1.c	FEMA-2008-0022-0097-011	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C Criteria A.1.c COMMENT: The criteria refer to formatting descriptions of organizational responsibilities and concepts of operation in NIMS format. This is shown in the guidance as applicable to licensees, states and local entities. The licensee block should be N/A.BASIS: NIMS format is appropriate for state and local plans, but is not appropriate for licensee plans. Licensee radiological emergency plans are specifically focused on plant events. State and local plans are more amenable to an all-hazards approach.	Noted	Criterion A.1.c is applicable to the licensee. Regarding the NIMS language, the original draft clearly stated "ORO plans shall be compliant with the National Incident Management System (NIMS)". The NIMS requirement does not apply to licensees. Guidance in the REP Program Manual is directed to OROs, not licensees. The sentence cited above has been deleted in the revised draft (See modificiations to Evaluation Criterion A.1.c in Part II.C - Planning Guidance). However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, the corresponding licensee should understand NIMS/ICS terminology in order to communicate with responders appropriately.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.c	FEMA-2008-0022-0098-019	Kansas Department of Health and Environment, Thomas Conley	Page II-6, sentence 10, change to read "whatever ICS system is used, make a block diagram to indicate the functional area that each response organization will be assigned."	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.1.c	FEMA-2008-0022-0095-020	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-6, sentence 10, change to read "whatever ICS system is used, make a block diagram to indicate the functional area that each response organization will be assigned."	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.c	FEMA-2008-0022-0105-002	Tennessee Emergency Management Agency, Gary Lima	Tennessee's REP Program is designed in this order, firstly, established performance standards (NUREG 0654); secondly NUREG 0654 embedded in the Extent of Play (EOP) for exercise participants and finally, exercise of the REP plans for Sequoyah and Watts Bar; to ensure continued viability of the off-site multi-jurisdictional response as written. HSEEP is all hazards oriented and needs to establish REP specific orientation via EEG's and target capabilities list before states can effectively respond to the Federal Register. Albeit we are being required to respond in advance of established EEG's.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
Criterion A.1.c	FEMA-2008-0022-0110-006	Alabama Emergency Management Agency, J Frank Price	page II-6, lines 10-12: Not having ICS structure from the plant leaves a OROs with incomplete blocks for ICS.	Noted	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.c	FEMA-2008-0022-0101-016	Florida Division of Emergency Management, Michael Younger	Page II-6, lines 10-15 An organizational diagram is a simple snapshot of a response organization's structure; however, as noted previously an ORO is not required under HSPD-5 to adopt NIMS unless they are seeking federal preparedness grants. Suggesting that this language berevised in such a way to be reflective of the concept of operations in place for a given ORO. For OROs that are NIMS compliant, the sample diagram may be confusing and should be replaced with one that resembles the standard ICS structure for command and general staff as found in the ICS training materials.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.1.c	FEMA-2008-0022-0121-026	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-7 Line: Exhibit II-1 Comments: While the State of Ohio understands that Field Teams are trying to directly and actively stop a release or fire are part of operations . the State of Ohio disagrees the Field Monitoring Teams and Sampling Teams that gather data are part of the Operations Section . They should be part of dose assessment and the Planning Section. It depends on the task of the particular field team. Traffic and access control normally goes under operations and not logistics . This chart should be reviewed for accuracy and completeness. Why is the Dose Assmt Center under Planning--would it be more logical under Operations.	Modified	The cited diagram has been deleted to avoid being too prescriptive. See Evaluation Criterion A.1.c in Part II.C - Planning Guidance.
Criterion A.1.c	FEMA-2008-0022-0113-003	North Carolina Division of Emergency Management, Stephen Payne	3. REP PROGRAM MANUAL LANGUAGE/REFERENCEPage II-8, Line 33 & 34ITEM: ". . . specify the individual, by title and/or position, responsible for maintaining 24 hour communications."Page II-9, Line 9ITEM:Specify who is responsible for managing the communications center.RECOMMENDATION/COMMENT: DELETE THSES STATEMENTSThis requirement goes beyond the information needed to insure an organization can accomplish an emergency recall of personnel.	Rejected	This comment is inconsistent with FEMA regulations and best practices. Removing these statements would be detrimental to the intent of the Evaluation Criterion. The requirement is to identify individuals by title. Personal information does not need to be included in the plan.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.1.c	FEMA-2008-0022-0073-010	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-9Comment: Lines 6. Criterion A.1.e. Specifying what the primary means of notification is understood. However, more definition is needed on what, exactly, is expected of a backup notification system.Potential Impact: Not knowing what the expectations of a backup system will lead to a myriad of different interpretations and might not meet the intent of the guidance. Needs a better definition. Recommend being more specific in the language to give the reader a better idea of what would be acceptable.Comment By: State/Locals	Modified	Backup means of notification refers to whatever secondary communication system is in place to execute notification if the primary communication link should fail. These could include, but are not limited to, commercial telephones, fax, and emergency radio frequencies. See Explanation section of Evaluation Criterion A.1.e in Part II.C - Planning Guidance.
Criterion A.1.c	FEMA-2008-0022-0121-027	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-9 Line: 7 Comments: Clarify "refer to personnel roster"	Modified	The requirement is to identify individuals by title. Personal information does not need to be included in the plan. See the buller list under Evaluation Criterion A.1.e in Part II.C - Planning Guidance.
Criterion A.2.a					
Criterion A.2.a	FEMA-2008-0022-0097-014	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	PageII-9, Line 26: References section B for licensee requirements.COMMENT: Delete this referenceBASIS: Licensee requirements are delineated in applicable regulation and are inappropriate for this document which is intended for use by the OROs.	Rejected	The cited text is quoted directly from NUREG-0654/FEMA-REP-1 and is part of the criterion language; therefore, it will not be deleted from the REP Program Manual. The reference is intended to clarify that criterion A.2.a applies only to offsite, whereas the criterion on the same subject for licensees is found in Section B.
Criterion A.2.a	FEMA-2008-0022-0116-026	Nuclear Energy Institute, Alex Marion	Part II.C, A.2.a, p.II-9, (line 26): References section B for licensee requirements. Part II.C, A.2.a, p.II-9, (line 26): Delete this referenceBasis: Licensee requirements are delineated in applicable regulation and are inappropriate for this document which is intended for use by the OROs.	Rejected	The cited text is quoted directly from NUREG-0654/FEMA-REP-1 and is part of the criterion language; therefore, it will not be deleted from the REP Program Manual. The reference is intended to clarify that criterion A.2.a applies only to offsite, whereas the criterion on the same subject for licensees is found in Section B.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.2.a	FEMA-2008-0022-0109-017	Ottawa County, Ohio, Koch Beth	Page II-9, lines 29-30: Both primary and support organizations should clearly describe their responsibilities and functions for major elements. These descriptions should also identify which of the five ICS functions the organizations will carry out.COMMENT: NIMS specific references should not be used.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.2.a	FEMA-2008-0022-0121-028	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-9 Line: 29-30 Comments: Identify. which of 5 ICS functions each will carry out? This manual relates too much to other documents - revisions to any will be far reaching!	Noted	The REP Program Manual is a compendium of guidance from many sources. The explanation provided under Criteria J.11 and J.12 includes details from EPA and FDA REP specific guidance for ease of reference.
Criterion A.2.a	FEMA-2008-0022-0109-006	Ottawa County, Ohio, Koch Beth	page II-9, lines 29-30 & line 33: These descriptions should also identify which of the five ICS functions the organization will carry out.COMMENT: NIMS specific references should not be used.	Modified	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

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Criterion A.2.a	FEMA-2008-0022-0101-017	Florida Division of Emergency Management, Michael Younger	Page II-9, lines 29-30 and 33 As noted previously, an ORO is not required under HSPD-5 to adopt NIMS unless they are seeking federal preparedness grants. Further, for any agency that has adopted NIMS and ICS the question is not which of the five ICS functions will be carried out but rather by whom.	Accepted	The cited REP Program Manual text has been amended to read, "these descriptions should also identify who will carry out the five ICS functions." See the Explanation section of Evaluation Criterion A.2.a in Part II.C. The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a).
Criterion A.2.a	FEMA-2008-0022-0101-018	Florida Division of Emergency Management, Michael Younger	Page II-10, line 3 The included matrix does not reflect the standard ICS structure for command and general staff as found in the ICS training materials.	Noted	The matrix provided is a sample. Actual matrices in ORO plans should reflect the actual functional responsibility areas of the ORO.
Criterion A.2.a	FEMA-2008-0022-0109-007	Ottawa County, Ohio, Koch Beth	page II-11, (matrix):COMMENT: NIMS specific references should not be used.	Rejected	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.

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Criterion A.2.a	FEMA-2008-0022-0109-008	Ottawa County, Ohio, Koch Beth	page II-11 (Matrix): Matrix asks for ICS Functional AreasCOMMENT: NIMS specific references should not be used.	Rejected	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). In accordance with HSPD-5 and to ensure interoperability and consistent terminologies and emergency management structure nationwide, NIMS is required not only as a condition for Federal Preparedness Grants, but also for technical assistance and services (i.e. REP Plan Review, Exercise Evaluation, etc.) It is highly recommended that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. However, note that NIMS compliance is not being evaluated at REP exercises. ORO performance is evaluated by the standard of their own plans/procedures, regardless of whether the ORO has adopted NIMS. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov.
Criterion A.2.a	FEMA-2008-0022-0116-027	Nuclear Energy Institute, Alex Marion	Part II.C, Exhibit II-2, p.II-11, (matrix): When responsibility is shared or lies with the licensee, how is this to be addressed in the matrix? Part II.C, Exhibit II-2, p.II-11, (matrix):Revise the matrix to provide an example of a shared responsibility and a responsibility fully implemented by the licensee on behalf of the state. Basis: This approach ensures consistency in application/implementation and provides a framework for documentation of those OROs where some functions are provided by the licensee (e.g., a non participating county or municipality – realism rule)	Rejected	Sharing of responsibilities between the licensee and the OROs varies from site to site. OROs can decide how to represent shared responsibilities in their matrix.
Criterion A.3					
Criterion A.3	FEMA-2008-0022-0114-003	Count of Lancaster, Pennsylvania, Randall Gockley	Additional requirements for route alert Memos of Understanding is additional bureaucracy and is not necessary with the existing high level of mutual aid we have in our region.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0116-022	Nuclear Energy Institute, Alex Marion	Part II.C, A.3, p. II-12 (line 40), p. II-13 (lines 1-12): The detail cited here should be deleted: The detail in the explanation does not conform to contemporary mutual aid agreement protocols or recognize capabilities that would become available under declared “state of emergencies” that are standard declarations at a Site Area Emergency.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.3	FEMA-2008-0022-0128-004	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-12, line 40, p. II-13 (lines 1-12):….The LOAs should contain explanations of the competency, capabilities, and available resources of the participating organizations. The LOAs should also include procedures for authorizing ORO responders to access the NPP site and other areas affected by events, as appropriated.COMMENTs: Within certain ORO jurisdictions LOAs are unnecessary due to mutual aid systems being employed. As an example the State of California and local Operational Areas (ie Counties) utilize the Standardized Emergency Management System (SEMS). This system allows for the request, mobilization and management of resources within the state at all levels of government without the need for LOAs. In addition, areas such as CA utilize Master Mutual Aid agreements for Fire, Law Enforcement, Emergency Managers and other resources.Explanation/Recomendation :Delete this criterion or allow flexibility for jurisdictions to acquire and manage resources without requiring the use of LOAs.	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0097-012	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	(Page II-12, Line 40 and Page II-13, Line 1-12) COMMENT: The detail in the explanation does not conform to contemporary mutual aid agreement protocols or recognize capabilities that would become available under declared “state of emergencies” that are standard declarations at a Site Area Emergency. The detail cited here should be deleted.BASIS: How is FEMA to determine what is a sufficient capability and competency? OROs have agreements with participating organizations based on available resources. Can FEMA find these resources insufficient under REP when they are a realistic inventory of supplemental resources for surrounding jurisdictions that support day to day emergency operations for ANY event?	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. In addition, the term "competency" has been deleted. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0095-021	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-12, sentence 40, refers to “competency”. Unless there is a specific methodology to assess competency or a definition that can be universally applied the reference should be deleted.	Accepted	The REP Program Manual has been modified to delete the term "competency" in the cited text. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0098-020	Kansas Department of Health and Environment, Thomas Conley	Page II-12, sentence 40, refers to “competency”. Unless there is a specific methodology to assess competency or a definition that can be universally applied the reference should be deleted.	Accepted	The REP Program Manual has been modified to delete the term "competency" in the cited text. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

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Criterion A.3	FEMA-2008-0022-0101-019	Florida Division of Emergency Management, Michael Younger	Page II-12, line 40 and Page II- 13, line 1 The issue of competency is a very broad scope to define, and it is not clear where the responsibility is assigned (to licensee, ORO or service provider) for validating competency.	Accepted	The REP Program Manual has been modified to delete the term "competency" in the cited text. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0110-007	Alabama Emergency Management Agency, J Frank Price	page II-12, line 40: “Competency” is subjective, capabilities and resources should be in LOAs.	Accepted	The REP Program Manual has been modified to delete the term "competency" in the cited text. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0113-004	North Carolina Division of Emergency Management, Stephen Payne	4. REP PROGRAM MANUAL LANGUAGE/REFERENCEPage, II-13, Lines 1-4ITEM: “The plans/procedures should include descriptions of current LOAs with each of the participating organizations. The LOAs should contain explanations of the competency, capabilities, and available resources of the participating organizations. The LOAs should also include procedures for authorizing ORO responders to access the NPP site and other areas affected by events, as appropriate.”RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:The plans/procedures should include descriptions of current LOAs with each of the participating organizations. The LOAs should contain required training levels, capabilities, and available resources of the participating organizations. BASIS:1. If the organization is not competent to accomplish the task, there is no need to task or have LOA.2. information/ procedures for authorizing ORO responders to access the NPP site should be in plans or procedures that can be more readily safeguarded than an LOA. Reference to the need for these procedures can be made in the LOA.	Accepted	The REP Program Manual has been modified to delete the term "competency" in the cited text. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0121-029	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-12 Line: 40 Comments: Letters of Agreement should not contain such specifics nor should they contain procedures.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0116-024	Nuclear Energy Institute, Alex Marion	specific information detailing LLEA resources and capabilities is proprietary to that agency and would not be released/provided to external organizations.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.3	FEMA-2008-0022-0109-020	Ottawa County, Ohio, Koch Beth	page II-12, line 40, p. II-13 (lines 1-12) ….The LOAs should contain explanations of the competency, capabilities, and available resources of the participating organizations. The LOAs should also include procedures for authorizing ORO responders to access the NPP site and other areas affected by events, as appropriated.COMMENTSpecific information is included in Plans and Procedures. LOAs are not intended for detailed information. OROs should not be authorizing site access. Access protocols should not be identified in public documents.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0097-013	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II. C, Criteria A.1.3COMMENT: Criteria A.1.3 includes an explanatory statement that LOAs should include procedures for authorizing ORO responders to access the NPP site and other areas affected by events as appropriate. The REP LOAs are not an appropriate location for these procedures to reside. Suggest deleting the explanatory statement.BASIS: This statement would be applicable to response by LLEA, offsite fire, and EMS services for HAB response, fire suppression assistance or emergency medical response. The procedures for these services gaining access to the site would be established with the cognizant site organization (e.g., station security, fire protection). These procedures are governed by other NRC regulations that pertain to the licensee. Further, in the case off law enforcement LOAs with station security, the information is classified as “safeguards” and needs to be handled as such.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0116-025	Nuclear Energy Institute, Alex Marion	Part II. C, Criteria A.1.3: Criteria A.1.3 includes an explanatory statement that LOAs should include procedures for authorizing ORO responders to access the NPP site and other areas affected by events as appropriate. The REP LOAs are not an appropriate location for these procedures to reside. Suggest deleting the explanatory statement. Basis: This statement would be applicable to response by LLEA, offsite fire, and EMS services for HAB response, fire suppression assistance or emergency medical response. The procedures for these services gaining access to the site would be established with the cognizant site organization (e.g., station security, fire protection). These procedures are governed by other NRC regulations that pertain to the licensee.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.3	FEMA-2008-0022-0121-011	Utility Radiological Safety Board of Ohio, Nancy Dragani	Letters of Agreementi MOU's are unique and information contained therein should not be dictated nor should resemble actual procedures. Letters of Agreement/MOU's are not needed in every case--mutual aid, EMAC, etc are in place for sharing of resources . Why include a statutory limit on an individual ' s signature authority?	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0101-020	Florida Division of Emergency Management, Michael Younger	Page II-13, lines 1-2 The LOAs detail the level of support or services that will be provided from one organization to another. Provisions for responders to access the plant should be included in procedure as described under criterion C.6 since LOAs are not the appropriate place for such details. Further, such information may also be considered safeguards or sensitive information with distribution limited as required.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0109-009	Ottawa County, Ohio, Koch Beth	page II-13, lines 1-2: The LOAs should also include procedures for authorizing ORO responders to access the NPP site and other areas affected by events, as appropriate.COMMENT: OROs initiate LOAs. OROs should not be authorizing site access. Access protocols should not be identified in public documents.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0121-030	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-13 Line: 4-12 Comments: The State of Ohio disagrees with requiring so much detail be included and that the Letters of Agreement must be included in the plans.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0102-019	Entergy Nuclear Operations, Inc., Michael Slobodien	A.3, Page II-12, Line 6: It may not be appropriate to include procedures for authorizing ORO responders to access the NPP site and other areas affected by events in LOAs. This explanatory statement should be deleted.Rationale: This statement would be applicable to response by LLEA, offsite fire, and EMS services for HAB response, fire suppression assistance or emergency medical response. The procedures for offsite response organizations accessing NPP sites (e.g., law enforcement, fire services, hazmat, and EMS) are established with the corresponding NPP site organizations and are governed by other NRC regulations that pertain to the licensee. For security reasons, such protocols for HAB events need to established and maintained in a confidential manner. LLEA response plans and agreements with NPPs may contain security sensitive, which would preclude public dissemination.	Modified	FEMA agrees that safeguarded information should not be included in LOAs. The cited REP Program Manual and corresponding Supplement 4 language have been amended to read that agreements should "refer to procedures for authorizing ORO responders to access to the NPP site." See the bullet list under NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.3	FEMA-2008-0022-0113-005	North Carolina Division of Emergency Management, Stephen Payne	[Page II-13, lines 4-12] RECOMMENDATION/COMMENT: DELETE THIS SECTIONBASIS:These paragraphs are in direct conflict with guidance on page I-22, lines 28 & 29. Too much detail is being required by State & local OROs to maintain.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0121-031	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-13 Line: 14-18 Comments: Why include a statutory limit on an individual's signature authority? This will cause an undo burden on the state and count ies to revise and update on a constant basis when there is an administrative change in between plan updates . The number of mutual agreements with other agencies and departments will need to be constantly monitored to ensure the signature authority is correct or needs to be updated .	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0042-004	Ned Wright	Guidance needs to be added on how often the LOAs need to be recertified or updated. Need to establish a standard for review; i.e. 1 year, 5 years, change of signatory etc.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion A.3	FEMA-2008-0022-0108-018	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-13 Line: 15-18 Comment: It should not be FEMA's responsibility to maintain the validity of LOAs. Describe the procedures in which FEMA Regions will monitor this information? How would FEMA be aware if a reorganization foreclosing the authority of the signatory has occurred.	Noted	Part of the ORO's responsibility during the Annual Letter of Certification proces is to review LOAs to ensure that agreements are still valid. The ORO certifies to the State that the agreements have been reviewed, and the State verifies this information in its ALC. The guidance for Evaluation Criteria A.3 and C.4 has been combined under A.3 for consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled.
Criterion A.3	FEMA-2008-0022-0087-003	South Carolina Emergency Management Division, Danny Loomis	Page 11·12 (A.3): A precautionary note-Letters of Agreement (LOAs) are In the main not legally binding documents. They cannot be considered reliable commitments of resources in the event of an emergency. A local government ordinance may be a more appropriate method for assuring committed support to an event.	Noted	The nature of support agreements is a function of local jurisdictions.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.4					
Criterion A.4	FEMA-2008-0022-0109-021	Ottawa County, Ohio, Koch Beth	page II-13, lines 35-42), p. II-14 (lines 1-2): Emergency response activities for a commercial NPP incident may last longer than 1 day. The plans/procedures should describe the provisions for maintaining the following essential emergency functions around the clock: communications, command and control…..The plans/procedures should identify the individual, b title and/or position, responsible for assuring continuity of operations. The plans/procedures should include a reference to a roster, as well as provisions for its maintenance, that identifies at least two shifts of key staff. The plans should identify who is responsible, by title and/or position, for maintaining the roster and where the roster is located.COMMENT: OROs routinely contend with events, i.e. weather and hazmat, that require around the clock, 24/7 operations.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion A.4	FEMA-2008-0022-0093-011	Texas Department of State Health Services, Bob Free	Page II-13, Line 39: NUREG Criterion A.4 FEMA should define, clarify or remove “protective response” in this statement: The plans/procedures should describe the provisions for maintaining the following essential emergency functions around the clock: communications, command and control operations, alert and notification of the public, accident/incident assessment, information dissemination for the public and media, radiological monitoring, protective response, security, provision of transportation services, etc... All of the functions listed in the statement are part of the protective response.	Noted	See the definition of "protective response" in glossary.
Criterion A.4	FEMA-2008-0022-0121-032	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-13 – II-14 Line: 41-42; 1-2 Comments: Plans/procedures should not contain a roster or provisions for its maintenance. These are administrative activities that can change and should not require FEMA approval. "the location where the roster is located" is an unnecessary requirement.	Modified	The intention is to provide general information in the plans, for example, reference to a roster that is kept at the EOC and maintained by the Emergency Management Coordinator. The guidance covers these areas to help OROs ensure that they are covering appropriate planning considerations. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Criterion A.4	FEMA-2008-0022-0113-006	North Carolina Division of Emergency Management, Stephen Payne	Page II-13, Line 43 & II-14, Lines 1-4RECOMMENDATION/COMMENT: DELETE THIS SECTIONBASIS:This requirement goes beyond the information needed to insure an organization can accomplish the required 24-hour operations for an event.	Rejected	The requirement is to identify individuals by title. Personal information does not need to be included in the plan.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.4	FEMA-2008-0022-0111-012	Illinois Emergency Management Agency, Andrew Velasquez	Page II-13 and the top ofII-14 covers administrative details such as specifying the length of a shift, that go beyond that level of detail usually found in plans.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.
Criterion A.4	FEMA-2008-0022-0121-033	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-14 Line: 5-7 Comments: It is far too specific to indicate shift periods and staff briefings because they cannot be determined in advance. This needs to be revised.	Noted	The REP Program Manual text says "Indicate the shift period (e.g., 8 or 12 hours), and specify that the outgoing staff will brief the incoming staff on the status of the emergency and the response activities occurring." The content of briefings is not specified, only that they will occur. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Criterion A.4	FEMA-2008-0022-0093-012	Texas Department of State Health Services, Bob Free	Page II-14, Line 11: NUREG Criterion A.4 General comment/concern regarding the following statement: “The plan should...Describe the responsibilities by the functional areas listed above, as well as the five ICS functions” NIMS/ICS requires that the functional areas listed on page II-13 lines 37-40 be discussed in state and local emergency response plans, however, the detailed responsibilities of non-radiological specific functional areas (e.g., transportation, communication, alert and notification of the public) are not directly located in the radiological annex of the OROs emergency response plans. They are functional requirements for all hazards, not just radiological ones. FEMA should acknowledge that these responsibilities may not include or discuss terminology used specifically for radiological hazards and can still meet the intent of NUREG Criterion A.4.	Noted	The REP Program Manual has been amended to clarify that NIMS/ICS elements only apply to OROs that have adopted NIMS. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC or specific functional areas), then FEMA will review those portions as needed. However, plans should indicate any procedure that would be different during a radiological incident.
Criterion A.4	FEMA-2008-0022-0109-010	Ottawa County, Ohio, Koch Beth	page II-14, line 11 Describe the responsibilities by the functional areas listed above, as well as the five ICS functions.COMMENT: NIMS specific references should not be used.	Modified	The explanation for Criterion A.4 has been amended to remove the matrix requirement. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Criterion A.4	FEMA-2008-0022-0109-022	Ottawa County, Ohio, Koch Beth	page II-14, line 11: Describe the responsibilities by the functional areas listed above, as well as the five ICS functions.COMMENT: NIMS specific references should not be used.	Modified	The explanation for Criterion A.4 has been amended to remove the matrix requirement. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Criterion A.4	FEMA-2008-0022-0098-021	Kansas Department of Health and Environment, Thomas Conley	Page II-14, sentence 12. This appears to be the same matrix as A.2.a. It is redundant and should be deleted.	Accepted	The explanation for Criterion A.4 has been amended to remove the matrix requirement. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion A.4	FEMA-2008-0022-0108-019	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-14 Line: 12-13 Comment: There are multiple places where criterion requirements overlap. This example is the matrix required by A.2.a and A.4. Duplicates need to be minimized and the specific requirement should be solely placed with the most appropriate criterion. A.4 could reference the requirements of A.2.a, but the duplicity allows for multiple planning issues, deficiencies, etc. LOAs are another good example. Multiple criterion require LOAs, A.3, C.4, L.1 and others.	Modified	The explanation for Criterion A.4 has been amended to remove the matrix requirement. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Criterion A.4	FEMA-2008-0022-0101-021	Florida Division of Emergency Management, Michael Younger	Page II-14, line 12-13 This is redundant under A.2.a.	Accepted	The explanation for Criterion A.4 has been amended to remove the matrix requirement. See the bullet list under Evaluation Criterion A.4 in Part II.C - Planning Guidance.
Planning Standard B					
Planning Standard B	FEMA-2008-0022-0097-007	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.II-4, [II-43] (lines 17-18): The term “near-site” EOF has been removed from the regulation yet retained here.COMMENT: Revise to reflect the current regulations (i.e., delete “near site”)	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Planning Standard B	FEMA-2008-0022-0116-019	Nuclear Energy Institute, Alex Marion	Part II.C, A.1.a, p.II-4, (lines 17-18): The term “near-site” EOF has been removed from the regulation yet retained here. Part II.C, A.1.a, p.II-4, (lines 17-18): Revise to reflect the current regulations (i.e., delete “near site”) Basis: Consistency with proposed rulemaking	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Planning Standard B	FEMA-2008-0022-0121-034	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-15 Line: 14-17 Comments: Confusing-is the criterion for ORO's only or for the Licensee. Recommend deleting the sentence line 14-15	Modified	FEMA recognizes that NUREG-0654/FEMA-REP-1 Planning Standard B is applicable only to the licensee. However, it is included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. Because Planning Standard B is applicable only to licensees, the Manual does not include any explanatory material.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard B	FEMA-2008-0022-0097-018	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-15-17, Line all: Discussions of the onsite ERO are inappropriate in this document.COMMENT: Delete Section B in its entirety.BASIS: Although it is acknowledged that the ORO should be aware of the onsite ERO and interface, a description here does not accomplish the desired knowledge/awareness as identified in the document. It adds meaningless, extraneous information that is duplicate of information maintained in the licensee's emergency plan.	Rejected	FEMA recognizes that NUREG-0654/FEMA-REP-1 Planning Standard B is applicable only to the licensee. However, it is included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. Because Planning Standard B is applicable only to licensees, the Manual does not include any explanatory material.
Planning Standard B	FEMA-2008-0022-0102-020	Entergy Nuclear Operations, Inc., Michael Slobodien	B.1 – B.9Pages II-15-17: Provides descriptions of the onsite ERO.Comments: The stated intent throughout the REP Manual says: "Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs". The detailed discussion of the licensee ERO is not useful for ORO planning purposes, other than for general awareness. It is suggested that Section B be deleted or briefly summarized.Rationale: The added detail provided in the draft REP Program Manual duplicates information maintained in the licensee's emergency plan.	Rejected	FEMA recognizes that NUREG-0654/FEMA-REP-1 Planning Standard B is applicable only to the licensee. However, it is included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. Because Planning Standard B is applicable only to licensees, the Manual does not include any explanatory material.
Planning Standard B	FEMA-2008-0022-0109-011	Ottawa County, Ohio, Koch Beth	page II-15-17, (all lines):COMMENTL Discussions of the onsite ERO are inappropriate in this document.	Rejected	FEMA recognizes that NUREG-0654/FEMA-REP-1 Planning Standard B is applicable only to the licensee. However, it is included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. Because Planning Standard B is applicable only to licensees, the Manual does not include any explanatory material.
Planning Standard B	FEMA-2008-0022-0087-004	South Carolina Emergency Management Division, Danny Loomis	Page 11-17 (B8): The clarifying statement provided tends to confuse the Issue. Contracts or commitments with private entities or other organizations need to be coordinated through the local Jurisdiction.	Noted	The REP Program Manual contains guidance for OROs. It does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Planning Standard B	FEMA-2008-0022-0087-005	South Carolina Emergency Management Division, Danny Loomis	Page 11-17 (B9): Same as a8-except the base statement Is a little clearer.	Noted	The REP Program Manual contains guidance for OROs. It does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard C					
Criterion C.1.a					
Criterion C.1.a	FEMA-2008-0022-0108-020	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-18 Line: 13 Comment: See comments for A.4. C.2.a references two other criterion, both of which can address this criterion.	Noted	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.1.a	FEMA-2008-0022-0113-007	North Carolina Division of Emergency Management, Stephen Payne	Page II-18, Line 15 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Give an estimate of time for requested resources to arrive at the desired location.BASIS:Local ORO's will not be able to give an accurate time for arrival of resources outside their control.	Noted	The intent is to establish a general timeframe for planning purposes. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.
Criterion C.1.a	FEMA-2008-0022-0121-035	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-18 Line: 18-19 Comments: It would be helpful to clarify when DHS is the lead Primary agency and when the NRC is the lead because the Nuclear/Radiological Annex of the NRF is not very clear on this point.	Noted	FEMA is the lead for offsite prepareness matters. The NRC is the lead for onsite preparedness matters.
Criterion C.1.a	FEMA-2008-0022-0080-003	Douglas Fleck	Page II-18 thru II-20 describes the planning requirements for receiving federal assistance. This entire section is overly prescriptive. Federal assistance is requested by the states. The states already are familiar with these procedures from past experience. The entire process is part of what is done under an all-hazards approach and it does not need rewritten for the purposes of REP. Requesting federal assistance for a REP incident is no different than for a plane crash, hurricane, terrorist attack, etc. There is no advantage to specifying a person by title (C.1.a). It is ludicrous to guess at federal asset arrival times and include them in a plan (C.1.b). Nothing at all is gained by designating anything beyond servicing airfields and potential facility locations (C.1.c). None of these prescribed criteria can realistically be met until the time of the incident after incident managers are identified, aircraft availability is confirmed, and the extent of danger or contamination is determined. This criterion should be simplified to merely require a plan to list what federal assets may be able to help and potential airfields and facilities that may be available.	Rejected	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.a	FEMA-2008-0022-0100-004	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-18 thru Page II-20 describes the planning requirements for receiving federal assistance. Although the inclusion of planning factors is a typical item to include within a plan such as the anticipated time frame for the arrival of federal assets after a request is made, insufficient real-time information is available.This criterion should be simplified to state that a REP plan should list the federal assets which may be needed along with the potential locations, airfields and facilities that may be available for receipt and setup of the federal assets. In jurisdictions with multiple Commercial Nuclear Power Plants, a table or matrix should be incorporated within the plan.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.1.a	FEMA-2008-0022-0080a-003	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-18 thru II-20 describes the planning requirements for receiving federal assistance. This entire section is overly prescriptive. Federal assistance is requested by the states. The states already are familiar with these procedures from past experience. The entire process is part of what is done under an all-hazards approach and it does not need rewritten for the purposes of REP. Requesting federal assistance for a REP incident is no different than for a plane crash, hurricane, terrorist attack, etc. There is no advantage to specifying a person by title (C.1.a). It is ludicrous to guess at federal asset arrival times and include them in a plan (C.1.b). Nothing at all is gained by designating anything beyond servicing airfields and potential facility locations (C.1.c). None of these prescribed criteria can realistically be met until the time of the incident after incident managers are identified, aircraft availability is confirmed, and the extent of danger or contamination is determined. This criterion should be simplified to merely require a plan to list what federal assets may be able to help and potential airfields and facilities that may be available.	Rejected	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.1.b					
Criterion C.1.b	FEMA-2008-0022-0087-006	South Carolina Emergency Management Division, Danny Loomis	Page 11-19 (C.l.c): Getting or maintaining resources to support federal assistance during an event should include the licensee, not just the ORO. Utility funding to sustain such resources should be allocated through current funds provided to FEMAon an annual basisfor exercise support. In conjunction with the provided funding FEMA needs to respond, as they would In an actual event, to exercises. Participating in their role would test the readlness-and justify adequacy of the needed federal support.	Noted	The responsible ORO declares a State of Emergency and requests Federal resources when local resources are, or soon will be, overwhelmed. Funding under these conditions is governed by the Stafford Act. Demonstration of Federal support is beyond the scope of REP biennial exercises that are intended to test the planning and preparedness of local OROs.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.b	FEMA-2008-0022-0101-022	Florida Division of Emergency Management, Michael Younger	Page II-19, lines 2-15 Due to the ever changing capabilities of the federal government, it is important that state emergency response agencies be kept informed of any changes to or new capabilities of the federal response. The responsibility for providing updated capabilities and response times should rest with FEMA as the federal agency responsible for coordinating the federal response in support of the states	Noted	FEMA can support OROs through outreach training, SAVs, and FRPCC in providing this information.
Criterion C.1.b	FEMA-2008-0022-0093-015	Texas Department of State Health Services, Bob Free	Lines 5-15 of page II-19 should be revised as follows: Explanation The planning process should include an assessment of potential shortfalls in resources (e.g., equipment, personnel, facilities), indicate how those requirements can be met using outside resources, and give the expected time required for arrival at each NPP. Planning is one of the five ICS Functions and its role includes the process of assessing potential shortfalls in resources (e.g., equipment, personnel, facilities), and identifying outside resources that can be provided by Federal agencies. The NRF Nuclear/Radiological Incident Annex provides information and lists key Federal radiological resources and assets. The plans/procedures should include: § Process for identifying potential shortfalls in resources. § Information on A list of resources that a State, local, or tribal government can expect to receive from the Federal government. § How long it will take those resources to arrive at the desired location.	Modified	The cited section has been amended to include the following part of the commenter's suggested language: "Planning is one of the five ICS Functions and its role includes the process of assessing potential shortfalls in resources (e.g., equipment, personnel, facilities), and identifying outside resources that can be provided by Federal agencies." See the Explanation section of Evaluation Criterion C.1.b in Part II.C - Planning Guidance.
Criterion C.1.b	FEMA-2008-0022-0093-013	Texas Department of State Health Services, Bob Free	Page II-19, Lines 7-9 & 12: NUREG Criterion C.1.b The explanation FEMA gives for this criterion does not relate to the intent of NUREG-0654 Criterion C.1.b. Planning is one of the five ICS functions and its role includes the process of assessing and identifying potential shortfalls in resources. This task should not be specifically required in REP plans based on NUREG-0654 Criterion C.1.b. and cannot be pre-determined in detail before an incident has occurred. It is also already a NIMS/ICS requirement for the ICS Planning Function.	Noted	NUREG-0654/FEMA-REP-1 pre-dates NIMS/ICS and therefore includes this planning requirement. The cited section has been amended to include the following language: "Planning is one of the five ICS Functions and its role includes the process of assessing potential shortfalls in resources (e.g., equipment, personnel, facilities), and identifying outside resources that can be provided by Federal agencies."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.b	FEMA-2008-0022-0121-036	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-19 Line: 7-8 Comments: Does should have the same meaning as shall? This would be difficult to estimate and would depend on a number of variables such as time of the incident. season , etc. Does this require assessment of potential shortfalls?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Techincal Basis of the REP Program, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion C.1.b	FEMA-2008-0022-0078-020	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page 11-19 line 7-15 “Should” or “shall”? Is this a recommendation or a regulatory requirement?	Modified	The commenter is referring to the explanation for Criterion C.1.b. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Techincal Basis of the REP Program, Section 3 - Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.b	FEMA-2008-0022-0093-014	Texas Department of State Health Services, Bob Free	Page II-19, Line 7-9 and 12: The NRF Nuclear/Radiological Incident Annex contains a section called “Key Federal Radiological Resources/Assets”. This section provides information on resources that a State, local, or tribal government can expect to receive from the Federal government. State and local plans should be deemed adequate if they reference the NRF Nuclear/Radiological Incident Annex as an alternative to listing the detailed information of Federal resources.	Rejected	The list of Federal resources in the NRF NRIA is a generic list of Federal capabilities. In contrast, Criterion C.1.b requires a specific list of resources, and estimate time of arrival, that have been negotiated between the ORO and the appropriate Federal agencies.
Criterion C.1.b	FEMA-2008-0022-0078-021	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page 11-19 line 7-15 This makes the state responsible for maintaining current and in-depth information on assets they neither own or control. How then will federal agencies, ones that would offer assets in a REP event, be required to participate with states in the planning process? Outside of an IPX, minimal federal assistance is presently available to plan and more clearly define the state-federal REP interface.	Noted	The intent is to establish a general timeframe for planning purposes (see footnote to C.1.b)
Criterion C.1.b	FEMA-2008-0022-0121-037	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-19 Line: 15 Comments: Why would the federal government require the state and counties to dictate to them the resources required and the delivery of them? The federal government should already have resources designated and available to assist the state and counties and the approximate time it takes to become available .	Noted	The intent is to establish a general timeframe for planning purposes (see footnote to C.1.b)
Criterion C.1.c					
Criterion C.1.c	FEMA-2008-0022-0110-008	Alabama Emergency Management Agency, J Frank Price	page II-19, lines 28-29: The amount of detail in the plan would be problematic. An ICS comm. Plan is developed for an incident having them before may cause confusion. Without Federal agencies participating in REP exercise understanding the needs and shortfalls is not practical for planners.	Noted	The intent is to establish a general timeframe for planning purposes (see footnote to C.1.b) The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.c	FEMA-2008-0022-0106-045	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-19 thru II-20 Lines 28-37 & Lines 1-6Comment: Its time to delete or totally revise Criterion C.1.c which requires the Licensee, State and Locals to provide what local resources are available to support the Federal response, e.g., airfields, command posts, telephone lines, radio frequencies and telecommunications centers. The Federal Responders should come prepared with these needs pre-identified and where such support can be obtained or bring it with them. When diasters occur, it means the State has expended all its resources and needs additional support from its neighbors and the FEDs. Please explain why REP plans should continue to specify resources available to support a Federal Response when there is no such requirement for any other Federal Disaster. Why is there not a requirement for these assets to be listed in Federal plans? Finally in Presidentially declared emergencies, FEMA doesn't come in and ask the State where to set up its JFO, FEMA along with the GAO does this.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.1.c	FEMA-2008-0022-0078-022	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page 11-19, 20 beginning line 35: What level of local personnel is required for the local tour? This could become an issue during a real event when resources are limited. What is expected in describing the “unique aspects of the area”?	Modified	The explanation for Criterion C.1.c has been amended for clarity to read, "Identify the general geographical areas for the locations of these facilities and the unique features of the area." See the bullet list under Evaluation Criterion C.1.c in Part II.C - Planning Guidance.
Criterion C.1.c	FEMA-2008-0022-0078-023	Minnesota Homeland Security and Emergency Management, kevin Leuer	Pages: Throughout Section II Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROs. Licensee _X_ State ___ Local ___ Comments: • This statement appears after every criterion in Section II, but should be removed from the criteria that pertain only to the licensee • Page numbers and criteria where this statement appears but does not pertain: Page II-15 - B.1, B.2, B.3 Page II-16 - B.4, B.5, B.6 Page II-17 - B.7, B.8, B.9 Page II-21 - C.2.b Page II-25 - D.1, D.2 Page II-31 - E.3, E.4 Page II-43 - F.1.f Page II-53 - G.3.b Page II-59 - H.1, H.2 Page II-61 - H.5 Page II-63 - H.8, H.9 Page II-68 - I.1, I.2 Page II-69 - I.3, I.4, I.5, I.6 Page II-78 - J.1 Page II-79 - J.2, J.3, J.4, J.5 Page II-80 - J.6, J.7 Page II-81 - J.8 Page II-105 - K.1 Page II-106 - K.2 Page II-119 - K.6, K.7 Page II-122 - L.2 Page II-129 - M.2 Page II-138 - N.2.b Page II-139 - N.2.c Page II-141 - N.2.e Page II-144 - O.1.a Page II-146 - O.2, O.3 Page II-148 - O.4.e Page II-149 - O.4.g Page II-150 - O.4.i Page II-156 - P.9	Modified	FEMA recognizes that NUREG-0654/FEMA-REP-1 Planning Standard B is applicable only to the licensee. However, it is included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. Because Planning Standard B is applicable only to licensees, the Manual does not include any explanatory material.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.1.c	FEMA-2008-0022-0093-016	Texas Department of State Health Services, Bob Free	Page II-19, Line 35: NUREG Criterion C.1.c The following sentence should be changed to read: “In addition, arriving outside federal personnel need local personnel to provide information on and assistance with the unique features of the area.” This specific criterion focuses on federal response, not other entities arriving from outside of the local area. Mutual Aid agreements of additional support (regional and State) are addressed in other NUREG Criteria.	Accepted	The REP Program Manual has been amended as suggested. Additional clarifications have also been made to the explanation. See bullet list and Explanation section of Evaluation Criterion C.1.c in Part II.C - Planning Guidance.
Criterion C.1.c	FEMA-2008-0022-0113-008	North Carolina Division of Emergency Management, Stephen Payne	Page, II-20, Line 2-3RECOMMENDATION/COMMENT: REPLACE WITH ORIGINAL WORDING:“Describe facilities that may be made available to Federal response personnel.”	Accepted	The REP Program Manual has been amended as suggested. See bullet list under Evaluation Criterion C.1.c in Part II.C - Planning Guidance.
Criterion C.1.c	FEMA-2008-0022-0101-023	Florida Division of Emergency Management, Michael Younger	Page II-20, line 4 While it is agreed that ORO plans should specify any special communications requirements that may be required, it is anticipated that any federal response personnel will be otherwise self sufficient with their own interoperable communications system. As such, “communications equipment” should be deleted and an emphasis made on site specific communications requirements.	Accepted	The REP Program Manual language has been amended to emphasize site-specific communications requirements. See bullet list under Evaluation Criterion C.1.c in Part II.C.
Criterion C.1.c	FEMA-2008-0022-0110-009	Alabama Emergency Management Agency, J Frank Price	page II-20, lines 4-6: Planners at State and Local levels do not have the detailed information needed from the numerous Federal agencies. Planners can use the NRF, but detail planning will require region planning and exercises with Federal agencies.	Modified	The cited text has been amended to read, "Describe the interoperable communications plans, equipment, and protocols that may be made available to Federal response personnel." See the bullet list under Evaluation Criterion C.1.c in Part II.C - Planning Guidance.
Criterion C.1.c	FEMA-2008-0022-0101-024	Florida Division of Emergency Management, Michael Younger	Page II-20, lines 5-6 This is a very broad planning requirement unless the federal response agencies regularly provide their current logistical support requirements to state and local response organizations	Modified	The cited text has been amended to read, "Describe the interoperable communications plans, equipment, and protocols that may be made available to Federal response personnel." See the Explanation section in Evaluation Criterion C.1.c in Part II.C - Planning Guidance
Criterion C.1.c	FEMA-2008-0022-0093-017	Texas Department of State Health Services, Bob Free	Criterion C.1.c The following statement should be removed: “Describe the procedures to be used to obtain facilities that may be made available to Federal response personnel” This planning process needs to be initiated by the federal agency requesting the facility or any other local or State resources. This process can be accomplished through a cooperative effort between state, local and appropriate FEMA Region and participating federal agencies.	Modified	This statement is provided as guidance to ensure that OROs consider all potential support arrangements in advance. The explanation for C.1.c has been modified for clarity. See the Explanation section in Evaluation Criterion C.1.c in Part II.C - Planning Guidance

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Criterion C.2.a					
Criterion C.2.a	FEMA-2008-0022-0077-005	PA DEP Bureau of Radiation Protection, David Allard	Page II-20, Lines 17-19Reference is made here to the 'licensee's near-site Emergency Operations Facility'. In 74 FR 23254, Nuclear Regulatory Commission Enhancements to Emergency Preparedness Regulations, Proposed Rule, May 18, 2009, Page 23270, Section V. Section-by-Section Analysis, Section 50.47, NRC proposes to remove the reference to the EOF as a 'near-site facility'.	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.2.a	FEMA-2008-0022-0101-025	Florida Division of Emergency Management, Michael Younger	Page II-20, lines 27-28 This statement should be expanded to include under what conditions or at what emergency classification level this would occur. Additionally, for some OROs, there needs to be flexibility for the deployment of staff based on their immediate availability at the time.	Rejected	The ORO determines deployment procedures. For instance, information about liaisons to the EOF should be included in the plans/procedures. Criterion E.1 addresses the plans/procedures that are specific to emergency classification levels.
Criterion C.2.b					
Criterion C.2.b	FEMA-2008-0022-0080-004	Douglas Fleck	Page II-21, Line 1 states that licensee shall prepare for the dispatch of a representative to principal off-site governmental EOCs. This should be changed to read “if requested” at the end of the criterion.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion C.2.b	FEMA-2008-0022-0100-005	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-21, Line 1 states that the licensee shall prepare for the dispatch of a representative to principal off-site governmental EOCs. We believe that this criterion should be changed to include the statement “if requested”.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion C.2.b	FEMA-2008-0022-0080a-004	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-21, Line 1 states that licensee shall prepare for the dispatch of a representative to principal off-site governmental EOCs. This should be changed to read “if requested” at the end of the criterion.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.3					
Criterion C.3	FEMA-2008-0022-0095-023	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-21, Criterion C.3. This is a daunting task and is not a reasonable requirement for state agencies to demonstrate or include in the planning process. The Department of Energy's FRMAC has been unable to succeed at keeping track of laboratories' capabilities, throughput, and availability. The best anyone can hope to maintain consistently is where the laboratories are, and their contact phone numbers. The resources and time required to meet this criterion is unreasonable. This criterion should be changed to state "Each organization shall have the ability to identify radiological laboratories and their contact information, for use in an emergency. Utilization of federal agency lists are acceptable to meet this criterion."	Rejected	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.3	FEMA-2008-0022-0098-022	Kansas Department of Health and Environment, Thomas Conley	Page II-21, Criterion C.3. This is a daunting task and is not a reasonable requirement for state agencies to demonstrate or include in the planning process. The Department of Energy's FRMAC has been unable to succeed at keeping track of laboratories' capabilities, throughput, and availability. The best anyone can hope to maintain consistently is where the laboratories are, and their contact phone numbers. The resources and time required to meet this criterion is unreasonable. This criterion should be changed to state "Each organization shall have the ability to identify radiological laboratories and their contact information, for use in an emergency. Utilization of federal agency lists are acceptable to meet this criterion."	Rejected	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.3	FEMA-2008-0022-0121-038	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-21 Line: 20 Comments: This would also depend on a number of variables at the time of the incident such as the number of samples provided and the number of samples awaiting analysis from other incidents, etc.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.3	FEMA-2008-0022-0073-057	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-21 – III-28Comment: Evaluating REP Exercises. Effective evaluation of REP program exercises relies upon the ability of each specific DHS/FEMA region to ensure that the exercise evaluators are provided with ORO plans and procedures in a timely manner. It is also incumbent upon the RAC Chair to ensure that the evaluators have read and understand how the region ORO's execute their specific REP Plans and Procedures.Potential Impact: Evaluators should also have the opportunity to contact ORO's in order to ask questions regarding the ORO plans and procedures. REP Program evaluator training needs to emphasize that the evaluator is evaluating how the ORO performs THEIR response and how THEIR procedures are implemented. While the experience of many REP evaluators is wide and varied, that must be set aside during an official evaluation. Constructive comments are welcomed by all OROs however, those comments should not take the form of Plan Issues or ARCA's if the ORO successfully met their exercise objectives. Many OROs have experience in responding to real life emergencies on a frequent basis. This LOCAL EXPERIENCE is incorporated into the ORO Plans and Procedures. RECOMMENDATION: DHS/FEMA RAC Chairs should ensure that evaluators are briefed prior to the exercise.	Noted	Plans/procedures need to be submitted to the Region in a timely manner to ensure that evaluators can be informed prior to the exercise. Please see the milestones in Exhibit III-1. Evaluator briefing on plans/procedures is part of existing FEMA regional standard practices.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4					
Criterion C.4	FEMA-2008-0022-0080-005a	Douglas Fleck	Page II-22, Lines 1-35 directs OROs to prepare and implement LOAs with potential assisting organizations. This requirement is an anachronism and should be replaced with the requirement that OROs merely maintain lists of organizations that may be called on for assistance if needed. LOAs and MOUs are nothing more than bureaucratic paper drills that give the appearance of having accomplished something positive. They are in no way legally binding and cannot be used to order that assistance be provided. If a media outlet says they are willing to broadcast EAS messages this in no way legally obligates them to do it or do it in a timely manner. Likewise transportation providers cannot be forced to provide transportation because of a “signed” LOA. LOAs and MOUs between the states have been replaced by the Emergency Management Assistance Compact. Most states have already developed similar concepts for use between their counties and municipalities. The licensee is already obligated by your own regulations. Nothing further is gained by going through the tedium required to create and update LOAs and MOUs. On Line 21 of this page you direct that the state emergency	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.4	FEMA-2008-0022-0080-005b	Douglas Fleck	(continued) management agency will provide response training to these providers and notify them. It would perhaps have been a good idea to confirm this with the respective state EMAs and individual state laws before making such a rule. Recommend the entire paragraph be deleted. On Line 24-25 you state that the LOAs contain an agreement that the provider will supply assets or services for training, drills, exercises, and emergencies. It is unrealistic to think that companies will pull assets and personnel from their profit making missions in order to play in a drill or exercise. Who is going to reimburse them for the revenue lost through such a requirement? If LOAs are to remain part of this program, regardless of their utility, this should be changed to read that opportunities to participate in training, drills, and exercises may be offered.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0020-005	Ashtabula County EMA, George Rolland	Page Ref. II-22 Comment: C.4 indicates that there needs to be included other nuclear plants in the LOA. Fleets do not have LOAs between facilities nor are there agreements between utilities but that resource is understood to be available. The same applies to fire departments & LLEAs, mutual aid is understood and supplied when needed. No LOAs exist or are needed. Comment by: Locals	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. The Explanation section for Evaluation Criterion C.4 has been deleted. Please refer to the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0021-005	Geauga County DES, Dale Wedge	Page Ref. II-22 Comment: C.4 indicates that there needs to be included other nuclear plants in the LOA. Fleets do not have LOAs between facilities nor are there agreements between utilities but that resource is understood to be available. The same applies to fire departments & LLEAs, mutual aid is understood and supplied when needed. No LOAs exist or are needed. Comment by: Locals	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. The Explanation section for Evaluation Criterion C.4 has been deleted. Please refer to the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0036-005	Lake County EMA, Larry Greene	Page Ref. II-22 Comment: C.4 indicates that there needs to be included other nuclear plants in the LOA. Fleets do not have LOAs between facilities nor are there agreements between utilities but that resource is understood to be available. The same applies to fire departments & LLEAs, mutual aid is understood and supplied when needed. No LOAs exist or are needed. Comment by: Locals	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. The Explanation section for Evaluation Criterion C.4 has been deleted. Please refer to the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0080a-005a	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-22, Lines 1-35 directs OROs to prepare and implement LOAs with potential assisting organizations. This requirement is an anachronism and should be replaced with the requirement that OROs merely maintain lists of organizations that may be called on for assistance if needed. LOAs and MOUs are nothing more than bureaucratic paper drills that give the appearance of having accomplished something positive. They are in no way legally binding and cannot be used to order that assistance be provided. If a media outlet says they are willing to broadcast EAS messages this in no way legally obligates them to do it or do it in a timely manner. Likewise transportation providers cannot be forced to provide transportation because of a “signed” LOA. LOAs and MOUs between the states have been replaced by the Emergency Management Assistance Compact. Most states have already developed similar concepts for use between their counties and municipalities. The licensee is already obligated by your own regulations.	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. The Explanation section for Evaluation Criterion C.4 has been deleted. Please refer to the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0080a-005b	Pennsylvania Emergency Management Agency, Douglas Fleck	(continued)Nothing further is gained by going through the tedium required to create and update LOAs and MOUs. On Line 21 of this page you direct that the state emergency management agency will provide response training to these providers and notify them. It would perhaps have been a good idea to confirm this with the respective state EMAs and individual state laws before making such a rule. Recommend the entire paragraph be deleted. On Line 24-25 you state that the LOAs contain an agreement that the provider will supply assets or services for training, drills, exercises, and emergencies. It is unrealistic to think that companies will pull assets and personnel from their profit making missions in order to play in a drill or exercise. Who is going to reimburse them for the revenue lost through such a requirement? If LOAs are to remain part of this program, regardless of their utility, this should be changed to read that opportunities to participate in training, drills, and exercises may be offered.	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. The Explanation section for Evaluation Criterion C.4 has been deleted. Please refer to the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0106-046	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact:Page Ref. RED-LINE VERSION: Page II-22, Lines 2-4Comment: The C-4 Criterion needs to be revised. While facilities, organizations and individuals by title that can be relied upon in an emergency may be identified in the plans, there is no reason that there should be a LOA/MOU with each one. In this day and age, such documents are no longer always needed. Take the Emergency Management Assistance Compact (EMAC), for example, which eliminates the need for LOAs/MOUs between States and support provided by them.Potential Impact: Unneccesary time expended that could be used in more important things like planning and training. May also scare away volunteer agencies who are already being inundated with other training and exercise requirements and will no longer support REP	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion C.4	FEMA-2008-0022-0079-005	Delaware Emergency Management Agency, James Turner	Part II Page 22 Issue: Each Organization shall identify nuclear and other facilities that can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement. Basis/Comment: Mutual aid is understood and supplied when needed and identified within State Emergency Management legislation. The entire Section on MOUs and LOAs needs careful review. The potential impact here is setting public safety agencies up for evaluation of the adequacy of mutual aid resources and potential conflicts with the Annual Letter of Certification submittals. Most jurisdictions already have all hazards mutual aid agreements are already implemented.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0100-006	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-22, Lines 1-35 directs Offsite Response Organizations (OROs) to prepare and implement Letters of Agreement (LOAs) with potential assisting organizations. We believe that this requirement should be changed to require that OROs maintain a current Notification and Resource Manual (NARM) as a component of their “All-Hazards” Emergency Operations Plan. Letters of Agreement and Memorandums of Understanding (LOAs/MOUs) may not carry the same provisions as a contract for services and may lack enforceability. In many instances, LOAs and MOUs between the states have been replaced by the Emergency Management Assistance Compact. Similarly, many local jurisdictions have implemented mutual aid agreements. Within Pennsylvania, the Pennsylvania Emergency Management Services Code defines the interactions between the various levels of government in terms of “unmet needs”.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0130-006	State of Vermont, Barbara Farr	Page II-22, line 2-4 Mutual Aid is understood and supplied by current Emergency Management Legislation. The potential impact here is setting public safety agencies up for evaluation of the adequacy of mutual aid resources and potential conflicts with Annual Letter of Certification submittals. Most jurisdictions have all-hazards agreements implemented.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0111-013	Illinois Emergency Management Agency, Andrew Velasquez	Page II-22. The specific contents of the Letters of Agreement are not necessarily needed if agreement to the plan, by Resolution, is accomplished. For example, Illinois approved plan does not require Letters of Agreement for county, city, school, equipment or personnel to be utilized in the plan to support a radiological accident C.4 needs to be modified to allow flexibility of each State and their method of complying with this criterion	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0128-005	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-22, line 6-11: Plans/procedures should identify government and nongovernmental organizations that can be relied upon to provide assistance in an emergency, including a description of the expected level of assistance. The assistance should be documented in LOAs. Examples of assisting organizations include: OROs….Vendors providing resources or other commercial services (e.g., tow trucks), Medical facilities…various broadcast and other media contacts….. COMMENTs :In all hazards and the day-to-day public safety arena, OROs are not required to document every aspect of assistance they would have with government and non-government organizations.Explanation/Recomendation: Delete reference, “the assistance should be documented in LOAs”.	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. In addition, the term "competency" has been deleted. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0109-023	Ottawa County, Ohio, Koch Beth	page II-22 (line 6-11): Plans/procedures should identify government and nongovernmental organizations that can be relied upon to provide assistance in an emergency, including a description of the expected level of assistance. The assistance should be documented in LOAs. Examples of assisting organizations include: OROs….Vendors providing resources or other commercial services (e.g., tow trucks), Medical facilities…various broadcast and other media contacts…..COMMENT: LOAs should not be so specific as to be restrictive. OROs have emergency arrangement/understandings with too many vendors to include all in LOAs.	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. In addition, the term "competency" has been deleted. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0116-029	Nuclear Energy Institute, Alex Marion	Part II.C, C.4, p. II-22 (line 6-11): This appears to be a new requirement for LOAs between OROs and may not be appropriate. In all hazards and the day-to-day public safety arena, OROs are not required to document every aspect of assistance they would have with government and non-government organizations. Delete reference, “the assistance should be documented in LOAs”. No reason to list specifics in LOAs other than to say “assistance as needed and requested” – no way to know ahead of emergency exactly what may be needed and if something is not included in the LOA then provider may not be ‘allowed’ to provide it.	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. In addition, the term "competency" has been deleted. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0097-019	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-22, Line 6-11 COMMENT: This appears to be a new requirement for LOAs between OROs and may not beappropriate. In all hazards and the day-to-day public safety arena, OROs are not required to document every aspect of assistance they would have with government and nongovernment organizations. Delete reference, “the assistance should be documented in LOAs”. No reason to list specifics in LOAs other than to say “assistance as needed and requested” – no way to know ahead of emergency exactly what may be needed and if something is not included in the LOA then provider may not be ‘allowed’ to provide it.BASIS: Another example of infringing upon daydo-day public safety protocols and creating a new requirement subject to evaluation under REP. Many EOC Staff (LLE, FD, Sheriff) have ‘LOAs’ with many of the providers (i.e., tow trucks) for all emergencies. Also, mutual aid is ‘understood’ between many agencies such as FDs and LLEs. (Mutual Aid Box Alarm Stations)	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. In addition, the term "competency" has been deleted. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0100-008	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-22, Lines 24-25 states that the Letters of Agreement are to contain an agreement that the provider will supply assets or services for training, drills, exercises, and emergencies. We believe that allowances should be made for OROs backed by laws which address the same items. Pennsylvania law requires school bus and transportation vehicles owned or leased by universities, colleges, and school districts to be made available to local county and state officials for emergency planning and exercise purposes and actual service in the event of an emergency evacuation.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0087-007	South Carolina Emergency Management Division, Danny Loomis	Page 11-22 (C.4): Contracts or commitments with private entities or organizations other than local jurisdictions that will operate in a local Jurisdiction during an event needs to be coordinated through the local Jurisdiction.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The nature of support agreements is a function of local jurisdictions.
Criterion C.4	FEMA-2008-0022-0101-026	Florida Division of Emergency Management, Michael Younger	Page II-22, lines 6-8 Consideration should be given to inclusion of services provided through contracts, purchase orders or other means as these procurement methods may also be used in support of response once local resources have been exhausted.	Accepted	REP Program Manual has been amended as suggested. The Explanation section of Evaluation Criterion C.4 in Part II.C - Planning Guidance has been deleted. Please see the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance for further guidance on Evaluation Criterion C.4. Written agreement do not exclusively mean LOAs and may include contracts purchases orders or other means of procurement. The explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance has been amended to reflect the suggestion.
Criterion C.4	FEMA-2008-0022-0113-009	North Carolina Division of Emergency Management, Stephen Payne	Page II-22, Line 17 RECOMMENDATION/COMMENT: REMOVE or REWORDBASIS:There is too much reliance on EAS as the primary means for official emergency information distribution. Need to look at current information distribution methods/systems.	Noted	The cited REP Program Manual text mentions EAS stations in the context of letters of agreement. It is mentioned only as an example. Other portions of the REP Program Manual and Supplement 4 address broadening backup alert and notification capabilities.
Criterion C.4	FEMA-2008-0022-0100-007	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-22, Line 21 states that the state emergency management agency will provide response training to the providers of services as well as notify them. We recommend that the entire paragraph be modified to account for the variances between Commonwealth and State governments. Additionally, we suggest that the statement be modified to make allowances for the provisions of applicable state laws, codes, and regulations.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate.
Criterion C.4	FEMA-2008-0022-0086-005	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-22, line, 21: Comments: Agreements with the State emergency management agency to provide training for vehicle operators or other emergency response personnel are not uniquely the role of the State, and commonly is the responsibility of local OROs. Delete or modify the statement.	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0108-021	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-22 Line: 21-23 Comment: The State emergency management agency is not always responsible for emergency response training. Recommend rephrasing as it looks like there is no alternative.	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0095-024	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-22, sentence 21, delete “that state emergency management agency will provide emergency response training” and insert “emergency response training will be provided as specified in the LOA/PO and at the level needed for the activity. The organization entering into the agreement will notify the provider of the need for its services.”	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0098-023	Kansas Department of Health and Environment, Thomas Conley	Page II-22, sentence 21, delete “that state emergency management agency will provide emergency response training” and insert “emergency response training will be provided as specified in the LOA/PO and at the level needed for the activity. The organization entering into the agreement will notify the provider of the need for its services.”	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0101-027	Florida Division of Emergency Management, Michael Younger	Page II-22, lines 21-23 State emergency management personnel may not be in a position to provide training to such personnel as a contracted resource may report directly to a county. Further, it is more reasonable that training, either annual or just in time, be provided by local emergency management agencies that are significantly more familiar with the unique aspects of the community and the local concept of operations for the response effort. Additional clarification needs to be made concerning what constitutes emergency response training or change to basic radiological emergency response training, which may be more appropriate.	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0121-040	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-22 Line: 21-23 Comments: Training is not always provided by the state, some organizations have their own training .	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0121-039	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-22 Line: 24-25 Comments: This should NOT be in a letter of Agreement as some agencies will not commit to providing resources to all drills and exercises.	Modified	The REP Program Manual has been modified to specify radiological emergency response training. In addition, "will provide training" is changed to "will assure training is provided." See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0121-041	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-22 Line: 26-27 Comments: The location cannot always be specified.	Noted	The location could be general. The intent is to have a planning basis for how long it would take to access the resources.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0079-004	Delaware Emergency Management Agency, James Turner	Part II Page 22 Issue: Letters of Agreement (LOA) should not specify an expiration date or contain a statement that it remains in effect until canceled by one of the parties. Basis/Comment: LOA should be written with the statement stating it remains in effect until canceled by one of the parties with a Ninety (90) day notice.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0130-007	State of Vermont, Barbara Farr	Part II Page 22: Letters of agreement (LOA) should not specify an expiration date or contain a statement that it remains in effect until canceled by one of the parties.Basic CommentsLOA should be written with the statement that it remains in effect until canceled by one of the parties with a 90 (ninety) day notice.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0020-004	Ashtabula County EMA, George Rolland	Page Ref. II-22 Comment: Disagree with lines 28 & 29 that say LOA should not contain a statement that it remains in effect until canceled by one of the parties. We feel that is a good statement for the LOA to contain but do acknowledge that the LOAs should be reviewed annually when writing the ALC. Comment by: Locals	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0021-004	Geauga County DES, Dale Wedge	Page Ref. II-22 Comment: Disagree with lines 28 & 29 that say LOA should not contain a statement that it remains in effect until canceled by one of the parties. We feel that is a good statement for the LOA to contain but do acknowledge that the LOAs should be reviewed annually when writing the ALC. Comment by: Locals	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0036-004	Lake County EMA, Larry Greene	Page Ref. II-22 Comment: Disagree with lines 28 & 29 that say LOA should not contain a statement that it remains in effect until canceled by one of the parties. We feel that is a good statement for the LOA to contain but do acknowledge that the LOAs should be reviewed annually when writing the ALC. Comment by: Locals	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0086-006	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-22, line 28: Comments: The language indicating that "the LOA should not specify an expiration date or contain a statement that it remains in effect until canceled by one of the parties" is confusing and is contrary to current accepted practices. Expiration dates or notices of cancellations serve as useful mechanisms to assist in the administration of LOAs. Such prohibited language as related to LOAs should instead be allowed to continue if it is useful to parties of LOAs. The language should be deleted or clarified.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0118-005	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Criterion C4 should be modified to include arequirement to review the LOA's periodically. We recommend they be reviewed, at aminimum, every 5 years, to ensure the agreement is still practical, enforceable, and thatall signatories are willing to abide by the terms set forth.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0073-011	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-22Comment: Lines 28-29. Criterion CA. Disagree that LOA's should not contain a statement that it remains in effect until canceled by one of the parties. We feel that a LOA should have a deadline date, typically 5-6 years, which would require a complete top-to-bottom review and update. An annual requirement for review and documentation of that review should also be included in all LOA's. LOA's can be a laborious process especially if the entity has many LOA's. Experience has shown us that LOA's need to be multi-year (5-6 year) agreements to help reduce the amount of work required to maintain them. Additionally, including a specific requirement to conduct an annual review and to document that review is recommended as well. Recommend modify requirement to incorporate a "documented" annual review and drop the "no end date" option.Potential Impact: Would require more work by EM organizations especially the smaller, rural offices. Without a more structured process, the LOA's have tendency to get stuck on a shelf and forgotten.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0088-001	Anonymous	Page II-22, lines 28-29, Criterion C.4: “The contents of the LOAs should indicate…Signatures of the parties authorized to execute the LOA and the date. The LOA should not specify an expiration date or contain a statement that it remains in effect until canceled by one of the parties.” The second sentence is confusing, possibly due to unclear grammar. Is this saying that LOAs should have a specific end/renewal date, or not? Logically, they should have some limiting factor to compel periodic review; otherwise it is not assured that the current organization representatives are on board with the agreement.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0104-003	Oregon Department of Energy, Shelley Carson	pg II-22, lines 28- 29 Oregon disagrees with the statement, "LOA should not specify an expiration date or contain a statement that it remains in effect until canceled by one of the parties." The state of Oregon will not sign an LOA if it does not contain a statement that allows the State to cancel if the need arises. Also, the other parties we may enter into an LOA with may require an expiration date. That would be beyond our control. An expiration date forces a periodic review to re-evaluate the validity of an LOA. If it is still warranted then a new LOA can be drafted and signed intoplace. Recommendation: Delete the whole last sentence.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0108-022	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-22 Line: 28-29 Comment: "The LOA should NOT specify an expiration date or contain a statement that it remains in effect until canceled by on of the parties." Is NOT supposed to be there?	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0120-003	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-22; lines 28-29I feel that it may be important to specify an expiration date if there is an upcoming authority change or merger taking place that may cancel the original agreement. If the signature authority of the LOA is in an elected or appointed position, the LOA might need to expire when they leave their position so that the new authority can be brought up to speed to ensure that they can continue to support the LOA. This should be left to the discretion of the organization it applies to. I feel that if there is an annual review in the ALC of existing LOAs there should be no reason why a LOA can’t contain a statement that it remains in effect until canceled by the participating parties instead of creating new agreements each year.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.4	FEMA-2008-0022-0113-010	North Carolina Division of Emergency Management, Stephen Payne	Page II-22, Line 28-29 RECOMMENDATION/COMMENT: REWRITE AS FOLLOWS:The contents of the LOAs should indicate:§ Signatures of the parties authorized to execute the LOA and the date signed. The LOA should not specify an expiration date but contain a statement that it remains in effect until canceled by one of the parties.BASIS:As written this item conflicts with other guidance in this document in addition to good administrative practices for MOU/MOA/LOA documents.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0121-042	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-22 Line: 29 Comments: It is inappropriate to dictate this. It is a state decision.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0113-011	North Carolina Division of Emergency Management, Stephen Payne	Page II-22, Line 34-36 RECOMMENDATION/COMMENT: DELETE THIS SECTIONBASIS:This is an unnecessary bureaucratic administrative requirement. These documents are reviewed biannually during FEMA Staff Assistance visits.	Modified	The guidance for Criteria A.3 and C.4 has been combined under A.4 for clarity and consistency. LOAs should contain some way of determining whether they are still in force, whether that is an expiration date or a statement that the LOA remains effective until canceled. LOAs are reviewed each year for the Annual Letter of Certification or other approved review. See the Explanation section of Evaluation Criterion A.3 in Part II.C - Planning Guidance.
Criterion C.4	FEMA-2008-0022-0106-047	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-22, Lines 28-29Comment: It is not up to NRC/FEMA as to how States/locals write LOAs/MOUs or determine when or if there is an expiration date. NRC/FEMA are assuming authority neither offered or given in determining the format, etc. of such documents	Modified	The guidance in the REP Program Manual represents a Federally-approved method for meeting the intent of this criterion. Alternative approaches are permitted. See Part I.D - Evaluation of Radiological Emergency Preparedness, Section 3 - Alternative Approaches and Methods.
Criterion C.4	FEMA-2008-0022-0121-043	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-22 Line: 33 Comments: What would be reported about the existing letter of Agreements?	Noted	The State would report that existing LOAs have been reviewed for validity. See "Annual Letter of Certification" in Part IV of the REP Program Manual.
Criterion C.5					
Criterion C.5	FEMA-2008-0022-0121-044	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-23 Line: 9-11 Comments: The wording should be changed to, "When state and local governments decline to participate in emergency planning, the licensee shall identify liaison personnel to assist state and local ..." or Ohio recommends using the same language as in Supp 1, page 2.	Modified	The explanation for this criterion has been modified to contain only a brief explanation to avoid confusion. Criterion C.5 and the associated items in Supplement 1 are only applicable to the licensee, and only in a very specific situation. See Evaluation Criterion C.5 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.5	FEMA-2008-0022-0101-028	Florida Division of Emergency Management, Michael Younger	Issue/Recommendation Basis: Page II-23, lines 9-16 With as much detail as has been put into the other criteria, a more detailed summary should be included in the explanation for this criterion instead of just a reference to Supplement 1.	Noted	The explanation for this criterion has been modified to contain only a brief explanation to avoid confusion. Criterion C.5 and the associated items in Supplement 1 are only applicable to the licensee, and only in a very specific situation.
Criterion C.5	FEMA-2008-0022-0108-023	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-23 Line: 16-17 Comment: Missing Licensee___ State___ Local ___	Modified	The explanation for this criterion has been modified to contain only a brief explanation to avoid confusion. Criterion C.5 and the associated items in Supplement 1 are only applicable to the licensee, and only in a very specific situation. See Evaluation Criterion C.5 in Part II.C - Planning Guidance.
Criterion C.6					
Criterion C.6	FEMA-2008-0022-0117-018	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, Criterion C.5, Page II-23Comments: There is no is no designation as to whom this criterion applies.explanation/RecommendatioN: Please add a line to identify whom this criterion applies to.	Modified	The explanation for this criterion has been modified to contain only a brief explanation to avoid confusion. Criterion C.5 and the associated items in Supplement 1 are only applicable to the licensee, and only in a very specific situation. See Evaluation Criterion C.5 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0112-001	Harford County Division of Emergency Operations, Linda Ploener	Why are you creating criteria for “hostile action based scenarios?	Noted	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The new guidance for HAB incidents is found primarily in two areas. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed plant design specifications or that LLEA resources could be overwhelmed. Criterion N.1.b has been enhanced to broaden the spectrum of initiating events in REP exercises to provide licensees and OROs the opportunity to practice responding to scenarios that place entirely different demands on resources from traditional exercise scenarios.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0128-002	San Luis Obispo County Office of Emergency Services , Ron Alsop	The inordinate amount of HAB-specific activities is not consistent with the rest of the document. The guidance is intrusive and lacks the brevity that more likely events are dealt with.Explanation/RecomendationThe document appears to be HAB based with some attention to radiological issues. HAB incident additions are far too prescriptive and voluminous. While the intent is to fill a perceived gap in preparedness, the risk is not the HAB incident but the release of radioactive fission products from the reactor. The brevity and concise nature of the guidance has been changed to long and sometimes misplaced narratives regarding the benefits of preparing for and conforming to federal guidance. The risks of a HAB incident are the same for any industrial complex not just NPPs. We recommend re-examining the additional incident guidance and looking to see if a more apt document for infrastructure protection can be created to benefit more than this already prepared and secure industry. HAB incidents should be treated similarly to other more likely events where the goal is to protect the public should a radiological release occur.	Noted	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The new guidance for HAB incidents is found primarily in two areas. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed plant design specifications or that LLEA resources could be overwhelmed. Criterion N.1.b has been enhanced to broaden the spectrum of initiating events in REP exercises to provide licensees and OROs the opportunity to practice responding to scenarios that place entirely different demands on resources from traditional exercise scenarios.
Criterion C.6	FEMA-2008-0022-0101-012	Florida Division of Emergency Management, Michael Younger	The inclusion of hostile action based events into the RPM undermines the all hazards planning approach and comprehensive nature of emergency management. There is any number of hazards that could impact aNPP that requires comprehensive emergency planning. OROs already have to plan for hostile action based events (ie terrorism) for all critical facilities and other potential targets in their jurisdiction.	Noted	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The new guidance for HAB incidents is found primarily in two areas. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed plant design specifications or that LLEA resources could be overwhelmed. Criterion N.1.b has been enhanced to broaden the spectrum of initiating events in REP exercises to provide licensees and OROs the opportunity to practice responding to scenarios that place entirely different demands on resources from traditional exercise scenarios.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0101-093	Florida Division of Emergency Management, Michael Younger	III – Planning and Preparedness for HAB Events (pages 6-8) The inclusion of hostile action based events into NUREG-0654 undermines the all hazards planning approach and comprehensive nature of emergency management. There is any number of hazards that could impact a NPP that requires comprehensive emergency planning. OROs already have to plan for hostile action based events (i.e. terrorism) for all critical facilities and other potential targets in their jurisdiction.	Noted	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The new guidance for HAB incidents is found primarily in two areas. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed plant design specifications or that LLEA resources could be overwhelmed. Criterion N.1.b has been enhanced to broaden the spectrum of initiating events in REP exercises to provide licensees and OROs the opportunity to practice responding to scenarios that place entirely different demands on resources from traditional exercise scenarios.
Criterion C.6	FEMA-2008-0022-0106-048	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-23, Lines 33 - 36Comment: Please explain how a natural disasters such as tornados, flooding, earthquakes or hurricanes are any different than HAB event in placing increased demands on State and local resources. Why now, all of a sudden does the NRC and FEMA feel we must do more planning for additional resouces for a HAB event when such natural disasters that were occurring before 9/11? In addition, why now when Nuclear Power Stations are no longer on Tier I or Tier II Federal critcal infrastructure lists?	Noted	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The new guidance for HAB incidents is found primarily in two areas. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed plant design specifications or that LLEA resources could be overwhelmed. Criterion N.1.b has been enhanced to broaden the spectrum of initiating events in REP exercises to provide licensees and OROs the opportunity to practice responding to scenarios that place entirely different demands on resources from traditional exercise scenarios.
Criterion C.6	FEMA-2008-0022-0067-001	Georgia Environmental Protection Division, Jim Hardeman	Page II-23, lines 18-19: NUREG Criterion C.6 is misrepresented here. The language here represents a new criterion which would exist only if NUREG-0654/FEMA-REP-1, Supplement 4 is issued in final without modification.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0113-012	North Carolina Division of Emergency Management, Stephen Payne	Page I-23, Lines 20-37; Page II-24, Lines 1-33 RECOMMENDATION/COMMENT: DELETE THIS ENTIRE SECTION BASIS:This is DRAFT proposed criteria in NUREG 0654/FEMA Sup 4. This is criteria and explanations that have not been approved and should not be identified as such.	Rejected	The commenter is referring to Criterion C.6. In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.
Criterion C.6	FEMA-2008-0022-0080-006	Douglas Fleck	Recommend this entire criterion be deleted. Immediate response to local emergencies is best handled by local emergency management agencies with the all-hazards procedures they already have in place and experience and practice regularly. They are the experts in this field – not bureaucrats at the national level.	Rejected	FEMA disagrees with the deletion of the guidance on HAB incidents. As a new criterion, it is necessary to explain C.6 in some detail. State and local jurisdictions are in varying stages of HAB planning. The additional guidance is helpful for those who have not yet developed plans addressing these circumstances. FEMA recognizes that local emergency management agencies are the first line of defense in any incident. However, criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.
Criterion C.6	FEMA-2008-0022-0117-008	California Emergency Management Agency, Elaine Jennings	Most OROs are currently performing adequate all-hazards planning which negates the need for specialized HAB planning. In states with master mutual aid agreements involving all counties, such as California, already established the availability of every fire, law, national guard, and emergency management asset in the state as a candidate to be alternate personnel for the event. Proscribing training and mutual aid in this section is simply unnecessary. Recommend removing the cited paragraphs [page II-23, lines 33-36 and page II-24, lines 1-25] as they provide no benefit or useful planning conventions for all-hazard emergency planners. The remaining paragraph (not cited) will be adequate for the new criterion.	Rejected	FEMA disagrees with the deletion of the guidance on HAB incidents. As a new criterion, it is necessary to explain C.6 in some detail. State and local jurisdictions are in varying stages of HAB planning. The additional guidance is helpful for those who have not yet developed plans addressing these circumstances. FEMA recognizes that local emergency management agencies are the first line of defense in any incident. However, criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0116-030	Nuclear Energy Institute, Alex Marion	Part II, C, Criterion C.6 – Only lines 27-28 on page II-23 are relevant to this criterion. Page II-23: Lines 21-25 should be deleted. Lines 27-31 should be deleted. Page II-24: Lines 1-25 should be deleted. Basis: The explanation contains too much hypothetical, scenario dependent situations and exceeds the intent of the criterion as written. The explanation as written would make the criterion impractical to implement and cause FEMA evaluation of day-to-day public safety resource arrangements. The explanation contradicts the first citation above referencing HSPD 5 where the implementation of NIMS provides for greater response consistency for ALL events. Implementation of NIMS and ICS should override the philosophy of singling out events at NPPs as unique response events and further separating REP response from that which is most effectively conducted under NIMS/ICS (most effectively because it is demonstrated daily for a range of events; not just for a biennial simulated demonstration).	Modified	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. In addition, note that the NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0101-029	Florida Division of Emergency Management, Michael Younger	Page II-23, lines 18-36 and Page II-24, lines 1-25 The explanation for this criterion offers little in the way of planning guidance and instead contains more hypothetical situations in an attempt to justify creation of the criterion. There is no mention of special planning considerations that may be unique to security based events. As a result, lines 21-25 and 33-36 on Page II-23 and lines 1-4, 7-14 and 16-25 on Page II-24 should be deleted. The resulting explanation (to be used as a starting point for further planning guidance development) would read: ORO plans and procedures should be coordinated with the licensee to provide for prompt access to the NPP site for initial first responders (e.g., law enforcement, fire rescue and medical personnel). Plans and procedures should also include provisions to ensure that response resources do not become an impediment to evacuation and vice versa, as well as planning to remove impediments to in-bound responders, including altering evacuation efforts. OROs should work with the licensees to identify solutions that will ensure timely implementation of emergency response plans. ORO plans and procedures should also include provisions for just in time training updates as the event progresses.	Modified	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. In addition, note that the NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0097-020	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Only lines 27-28 on page II-23 are relevant to this criterion. Page II-23: Lines 21-25 should be deleted. Lines 27-31should be deleted.Page II-24: Lines 1-25should be deleted. The explanation contains too much hypothetical, scenario dependent situations and does not address the criterion as written. The explanation as written would make the criterion impractical to implement and cause FEMA evaluation of day-today public safety resource arrangements. Licensees and OROs should be allowed to verify the availability of alternate ORO resources in a manner consistent with ORO inter-jurisdictional mutual aid/support protocols that are already implemented for all hazards and law enforcement events. The cognizant NPP organizations (operations, security, fire protection) have already made these arrangements per security procedures and B.5.b procedures. Aside from the fact that there are safeguard implications, there is no justification for duplicating these arrangements in the ORO REP.	Modified	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. In addition, note that the NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0020-058	Ashtabula County EMA, George Rolland	58 [4.4.10] Licensees should be allowed to verify the availability of ORO resources in a manner consistent with ORO inter-jurisdictional mutual aid/support protocols that are already implemented for all hazards and law enforcement events.	Modified	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. In addition, note that the NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0117-014	California Emergency Management Agency, Elaine Jennings	As it pertains to the addition of HAB incident planning and prescribed actions, the REP Program Manual, as proposed, is too prescriptive on hostile action contingencies which infringe on the daily public safety capabilities. The inordinate amount of HAB activities is not consistent with the balance of the document. The guidance lacks brevity of the existing response criterions. Explanation/RecommendatioN: Throughout the document the addition of the HAB incident activities are unevenly represented. The document now appears to be HAB based with some attention to radiological issues. HAB incident additions are far too prescriptive and voluminous. The HAB incident additions do not address existing state and federal critical infrastructure protection programs. We recommend re-examining the additional incident guidance to determine if a more apt document for infrastructure protection can be considered for integration.	Noted	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. Additional guidance is under development. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0122-006	Emergency Management and Homeland Security Division , James Porcello	The REP Manual appears to be putting the cart in front of the horse by specifying drill/exercise criteria prior to the availability of planning guidance. Hostile Action's (security threats) have always been included in plant plans and procedures and the criteria for declaration of events. Additionally, the process and procedures for moving resources on-site have always been requirements, but have not been tested in the 'normal' exercise cycle.	Noted	As a new criterion, it is necessary to explain C.6 in some detail. The cited lines are examples of planning considerations that may be unique to security-based events; however, the explanation for Criterion C.6 has been modified for clarity. Additional guidance is under development. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0116-003	Nuclear Energy Institute, Alex Marion	This statement assumes that EPZ police, fire and emergency medical resources would be consumed by such a hostile action and would be unavailable to support offsite protective actions. This is not necessarily the case. In some situations local public safety resources would not be consumed in a response to a hostile action at the plant. For example LLEA resources could include the local incident commander and specialized SWAT units made up of tactically trained personnel from many area law enforcement agencies (both EPZ and non-EPZ). For the most part, local public emergency response personnel would remain in place in their local communities. In addition, this passage seems to assume that evacuation would be necessary in the event of a hostile action event.	Noted	Agreed that this would be true in some locations, but not all. Particularly for sites located in rural areas, local first responders may not have separate tactical forces. OROs decide whether evacuation is an appropriate protective action for a particular set of circumstances.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0073-012	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-23Comment: Criterion C.6. Department of Health (DOH) will support a HAS type event by sending the appropriate staff to an offsite ICP as established by the nuclear power plant or the Incident Commander. DOH Field Teams will conduct pre-deployment activities and conduct background air sample and other radiation measurements. Unless otherwise directed by the IC, DOH field teams will standby at the Richland Field Office until coordination with law enforcement regarding communications, escort, and personnel identification has been conducted. DOH personnel are not trained to operate in an environment where violence on the part of a hostile group is expected.Potential Impact: Responder safety is key. Each jurisdiction must clearly state and understand their capabilities to operate in a hostile action event. WDOH field teams do not receive training nor are they equipped to operate in an area where violent action is expected.	Noted	Procedures and training to ensure the safety of responders are established through local plans/procedures.
Criterion C.6	FEMA-2008-0022-0095-025	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-23, the explanation for this criterion offers little in the way of planning guidance and instead contains more hypothetical situations in an attempt to justify creation of the criterion. There is no mention of special planning considerations that may be unique to security based events. Clearly more specific planning standards and basis need to be developed from the lessons learned during the HABD pilot program.	Modified	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0098-024	Kansas Department of Health and Environment, Thomas Conley	Page II-23, the explanation for this criterion offers little in the way of planning guidance and instead contains more hypothetical situations in an attempt to justify creation of the criterion. There is no mention of special planning considerations that may be unique to security based events. Clearly more specific planning standards and basis need to be developed from the lessons learned during the HABD pilot program.	Modified	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0072-002	Anonymous	The hostile action scenarios are just smoke and mirrors. There is no evaluation of an interface between on-site security and off-site law enforcement. There is no on-site integration of off-site with on-site. It appears phone too because you were unable to develop any significant criteria to evaluate a hostile action exercise because there are only slight modifications to the criteria and no new criteria have been added. I suspect that a forward command post will be required to be established but because there is no real substance here, the people at the forward command post will never set foot on-site and they will just stand around and communicate exercise injects between the forward command post and the EOC. How weak! Why wasn't a drill developed that required full integration of off-site law enforcement and on-site security? I suspect that it is because the NRC and NEI didn't want to actually improve their security posture, they just wanted to pretend they were. How is it that FEMA bought into this?	Noted	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0050-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The off-site emergency plans need to be integrated with the on-site security response plans. Currently the on-site security and off site emergency response plans are not integrated and are double counting resources and duplicating efforts.	Noted	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0078-026	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-23, lines 18-19 The first steps needed are for integrated security event response planning standards, leading to development of an integrated response plan. The utility security planning personnel should demonstrate better internal coordination and include utility EP in plan development, to ensure that plans developed within the context of the off-site activities taking place based are based on the ECL and not independent of the ECL. Utility EP should then coordinate both plans with off-site agencies	Noted	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0078-025	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-23, lines 18-19 The off-site emergency plans need to be integrated with the on-site security response plans. Currently they are not integrated and are resources are being double counted because there are separate security and general emergency response plans resulting in a duplication of efforts. The utilities need to be required to share information with ORO and integrate their security response plans with general ORO plans.	Noted	The explanation for Criterion C.6 has been modified for clarity. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management and is asking licensees to consider NIMS. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0125-008	Cumberland County Department of Public Safety, Eric Hoerner	Criterion C.6 should stand alone and delete the associated discussion.NRC stated in 9/17/09 meeting that this is not a new requirement and that if licensees are dependent of OROs to come on site…….[check 9/17 Public Meeting transcript]The implied implementation of this new requirement is impractical.The proposed implementation of criterion C.6 would introduce new and significant regulatory burden and associated costs, without any commensurate increase in the ability to protect public health and safety. This criterion, and the associated proposed change to 10 CFR 50, Appendix E, Section IV.A.7, essentially deal with the question of “backfilling” public safety personnel who may be assigned dual response roles – one at the NPP and one supporting the offsite response plan for the NPP.	Rejected	FEMA disagrees with the deletion of the guidance on HAB incidents. As a new criterion, it is necessary to explain C.6 in some detail. State and local jurisdictions are in varying stages of HAB planning. The additional guidance is helpful for those who have not yet developed plans addressing these circumstances. FEMA recognizes that local emergency management agencies are the first line of defense in any incident. However, criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.
Criterion C.6	FEMA-2008-0022-0020-060	Ashtabula County EMA, George Rolland	Criterion C.6 should stand alone and delete the associated discussion. NRC stated in 9/17/09 meeting that this is not a new requirement and that if licensees are dependent of OROs to come on site ..... [check 9/17 Public Meeting transcript] The implied implementation of this new requirement is impractical. The proposed implementation of criterion C.6 would introduce new and significant regulatory burden and associated costs, without any commensurate increase in the ability to protect public health and safety. This criterion, and the associated proposed change to 10 CFR 50, Appendix E, Section IV.A.7, essentially deal with the question of "backfilling" public safety personnel who may be assigned dual response roles - one at the NPP and one supporting the offsite response plan for the NPP.	Rejected	FEMA disagrees with the deletion of the guidance on HAB incidents. As a new criterion, it is necessary to explain C.6 in some detail. State and local jurisdictions are in varying stages of HAB planning. The additional guidance is helpful for those who have not yet developed plans addressing these circumstances. FEMA recognizes that local emergency management agencies are the first line of defense in any incident. However, criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0116-002	Nuclear Energy Institute, Alex Marion	NEI recommends that this criterion should stand alone and the associated discussion should be deleted. The implied implementation contained in the discussion of this criterion is impractical. The proposed implementation of criterion C.6 would introduce new and significant regulatory burden and associated costs, without any commensurate increase in the ability to protect public health and safety. This criterion, and the associated proposed change to 10 CFR 50, Appendix E, Section IV.A.7, essentially eal with the question of “backfilling” public safety personnel who may be assigned dual response roles – one at the NPP and one supporting the offsite response plan for the NPP.	Rejected	FEMA disagrees with the deletion of the guidance on HAB incidents. As a new criterion, it is necessary to explain C.6 in some detail. State and local jurisdictions are in varying stages of HAB planning. The additional guidance is helpful for those who have not yet developed plans addressing these circumstances. FEMA recognizes that local emergency management agencies are the first line of defense in any incident. However, criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.
Criterion C.6	FEMA-2008-0022-0093-018	Texas Department of State Health Services, Bob Free	Page II-24: Line 1-3 NUREG Criterion C.6 The statements “OROs should be able to support implementation of emergency plans during a Broad range of contingencies, including HAB events” and “Emergency response plans and procedures should be revised to incorporate the elements” are not clear. Are there examples of elements and contingencies FEMA wishes to incorporate?	Modified	The cited paragraph has been deleted. The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0106-006	Nebraska Emergency Management Agency, Jonathan Schwarz	Revision of local jurisdiction plans to meet specific HAB requirements is not beyond the current requirements of the State of Nebraska and locally established MOUs. However, "back fill" requirements for forces deployed to the nuclear power station in the event of a HAB do not specify how far into surrounding counties this requirement may be evaluated. Is the intent to include all counties in the 50-mile EPZ or only counties and non-governmental organizations immediately outside of the 10-mile EPZ? This open-ended requirement may place an excessive manpower and financial burden on Licensees and local jurisdictions at a time of severe economic impact. Additional training support to and participation in drills and exercises involving the Nuclear Power Station could greatly impact governmental resources (Sheriff's Department, police, fire, and EMS) in local jurisdictions that are currently being forced to down-size due to losses in tax base and other fiscal considerations. During the hours of darkness only one deputy may be available in some counties; therefore leaving that jurisdiction would require notification of additional manpower. Other specialized resources, i.e., bomb squads are in limited supply and may or may not be withheld if a HAB event could lead to action within the jurisdictions owning the bomb squad or other specialized response units.	Modified	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0116-023	Nuclear Energy Institute, Alex Marion	The proposed implementation of the new criterion does not add value in that if a licensee and respective OROs had specific MOUs and other associated attributes specifically designated for a HAB event at a NPP, in the event of attack or other public safety event that occurred prior to, or concurrent with the HAB event at the NPP, the MOUs, etc. are of no value. OROs plan for contingencies all of the time regardless of whether there is an event at a NPP, a shopping mall, or a school. This new criterion encroaches on arrangements/ resources that are planned for as part of routine public safety planning	Modified	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0020-006	Ashtabula County EMA, George Rolland	Page Ref. II-24 Comment: Lines 3 and 4 indicates that LOAs or MOUs exist with the local organizations. Licensee does have LOAs with some agencies (FDs nearest the site, Hospitals) - but they are not specific now so why do they need to address HAB specifically? Why is that response any different than for a contaminated/injured person or a radiological emergency? Comment by: Locals	Noted	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0106-013	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Pages 6 &7Comment: Ref III. Line 35 and Line 1: “Emergency response plans and procedures should be revised to incorporate these elements.” Again what does the word “should” entail? This seems to refer to Jurisdiction “All Hazard” plans and supporting procedures. Or is this only referring to the addition of specific language referring to HAB events at the Nuclear Power Station?Potential Impact: The specific language addressing HAB events is only a creation of the NRC/FEMA REP Program and is not reflected in DHS guidance to Federal, State and local jurisdiction concerning NRP, NIMS/ICS, or State and local planning requirements. The addition of this terminology would not be compatible with NIMS/ICS and could lead to confusion in dealing with potential responders from the State or local jurisdictions beyond the 10-mile EPZ.	Modified	The cited text has been deleted. The REP Program Manual language has been clarified regarding HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0093-019	Texas Department of State Health Services, Bob Free	Page II 24: Line 7-10 NUREG Criterion C.6 The example given, “ … an ORO may enter into mutual aid agreements with neighboring jurisdictions and private sector entities ….” appears to have been addressed under NUREG Criteria A.3 and E.2. FEMA should describe specific expectations for criterion C.6.	Noted	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0128-007	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-24 (line 16- 17): Plans and Procedures should also address maintaining additional duty rosters of qualified alternate personnel.COMMENTs: Licensees and OROs should be allowed to verify the availability of alternate ORO resources in a manner consistent with ORO inter-jurisdictional mutual aid/support protocols that are already implemented for all hazards and law enforcement events. Maintenance of ever-changing duty rosters contained in plans and procedures are an unrealistic expectation. In addition in the case of LLEA, rosters of personnel are considered proprietary.Explanation/Recomendation: Delete entire sentence.	Modified	The REP Program Manual language has been clarified regarding HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. OROs must have process for maintaining contact information, but lists containig personal information are not required to be included in the plan. The cited text has been amended to read "Plans/procedures should also address maintaining rosters and procedures for activating alternate personnel." See the Training subsection within Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0020-056	Ashtabula County EMA, George Rolland	Verification of mutual aid agreements, including rosters, training records, Position/Comment on the Proposed Rulemaking: The extent of "ORO coordination". The potential impact here is setting public safety agencies up for evaluation of the adequacy of mutual aid resources and the redundancy and potential for conflicts with Annual Letters of Certification submittals.	Noted	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0050-003	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The on-site and off-site response plans for hostile action plans must be required to be integrated, then developed and then exercised.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion C.6	FEMA-2008-0022-0050-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The planning standards and objectives for hostile action based drills to be exercised needs to be clearly defined well before we are required to be evaluated in a drill. We are currently using NEI drill guidance for the basis for planning which is not efficient or effective. The hostile action planning requirements need to be established first, then the plans need to be updated and then we can develop exercise guidance based on the planning requirements.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion C.6	FEMA-2008-0022-0078-024	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-23, lines 18-19 Each organization shall make provisions to enable onsite response support from OROs in a hostile action-based incident as needed. Comments: The planning standards and objectives for hostile action based drills need to be clearly defined well before we are required to be evaluated in a drill. We are currently using NEI drill guidance for a planning basis for planning, which is not efficient or effective. The hostile action planning requirements need to be established first, then the plans updated. Once planning guidance is developed we can develop exercise guidance based on the planning requirements.	Modified	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0078-029	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-23, lines 18-19 The on-site and off-site response plans for hostile action events must be required to be developed, integrated and then exercised. Without integrated planning, and clear planning guidance, we cannot successfully conduct hostile action drills with on-site and off-site response agencies	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion C.6	FEMA-2008-0022-0073-025	Washington Military Department Emergency Management Division, Jim Mullen	Comment 3: During a Hostile Action response, the Incident Commander would be making protective action decisions. This ICS concept is not congruent with current REP guidance, Potential Impact #3: The incident command system for a HAB is a law enforcement directed incident response. Time is needed to incorporate training for Law Enforcement command staff regarding for their decisions are communicated and executed.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion C.6	FEMA-2008-0022-0108-199	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 7 - III - In what time frame, does FEMA expect LOAs to be updated to reflect HAB responsibilities?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion C.6	FEMA-2008-0022-0020-007	Ashtabula County EMA, George Rolland	Page Ref. II-24 Comment: Fire departments, LLEAs and other agencies have mutual aid that is understood (Mutual Aid Box Alarm Stations) and do not have LOAs. Mutual aid is understood across county lines, state lines, etc. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0021-007	Geauga County DES, Dale Wedge	Page Ref. II-24 Comment: Fire departments, LLEAs and other agencies have mutual aid that is understood (Mutual Aid Box Alarm Stations) and do not have LOAs. Mutual aid is understood across county lines, state lines, etc. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0036-007	Lake County EMA, Larry Greene	Page Ref. II-24 Comment: Fire departments, LLEAs and other agencies have mutual aid that is understood (Mutual Aid Box Alarm Stations) and do not have LOAs. Mutual aid is understood across county lines, state lines, etc. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0079-006	Delaware Emergency Management Agency, James Turner	Part II Page 24 Issue: The wording of automatic. Basis/Comment: Automatic actions are not in line with Command Control schemes. The issue should be addressed in the approved State Plan and Standard Operating Procedures (SOP's).	Modified	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0106-014	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 7Comment: Ref III, multiple references: "Alternate Personnel" Who are the defined "alternate personnel?" Who maintains the identified roster"? What training is required for "Alternate Personnel"?Potential Impact: Maintaining rosters of "alternate personnel" would be a staffing and time drain for OROs and those potentially responding personnel from beyond the 10-mile EPZ. Notification of staff that is not on duty places a great burden on dispatch facilities on a 24-hour basis. Many dispatch facilities are manned by only one dispatcher for police, fire, and EMS during the hours of darkness. Calling in extra dispatch staff to make these notifications would be very time consuming and potentially violating strict overtime policies being enforced due to the current economic situation in most departments and jurisdictions. Therefore, all personnel should be trained as potential responders, again causing potential overtime overruns.Training of "Alternate Personnel" will place an additional burden on surrounding counties due to both personnel issues and fiscal constraints.MOUs between governmental bodies are put in place by elected officials. The Licensee may or may not be able to influence local officials to establish specific MOUs between jurisdiction and local government and non-governmental organizations.	Modified	Use of "alternate personnel to supplement local resources" is determined in the OROs plans/procedures. The roster would include points of contact at support agencies, not necessarily an extensive list of individuals. Alternate personnel are trained by OROs and the roster of identified individuals is maintained at the location deemed appropriate by the ORO. The language in the REP Program Manual has been amended to clarify the guidance on training. See the Alternate resources subsection within the Explanation section of NUREG Crtierion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0111-014	Illinois Emergency Management Agency, Andrew Velasquez	This criterion is poorly worded and could easily be misinterpreted. The statement; "plans and procedures should also address monitoring additional duty rosters of qualified alternate personnel" is vague and does not specify by whom this review should take place.	Noted	Use of "alternate personnel to supplement local resources" is determined in the OROs plans/procedures. The roster would include points of contact at support agencies, not necessarily an extensive list of individuals. Alternate personnel are trained by OROs and the roster of identified individuals is maintained at the location deemed appropriate by the ORO. The language in the REP Program Manual has been amended to clarify the guidance on training. See the Alternate resources subsection within the Explanation section of NUREG Crtierion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0121-045	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page:II-24 Line: 17-18 Comments: "maintaining additional staffing rosters" far too much detail - would be an unnecessary burden to the state and counties.	Modified	Use of "alternate personnel to supplement local resources" is determined in the OROs plans/procedures. The roster would include points of contact at support agencies, not necessarily an extensive list of individuals. Alternate personnel are trained by OROs and the roster of identified individuals is maintained at the location deemed appropriate by the ORO. The language in the REP Program Manual has been amended to clarify the guidance on training. See the Alternate resources subsection within the Explanation section of NUREG Crtierion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0108-198	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 7 - III - Does FEMA have any recommendations for appropriate online courses for OROs?	Noted	Training requirements are based on ORO functions and needs. The FEMA EMI web site offers many emergency management courses, including many on-line courses (see http://training.fema.gov) Also, States offer many courses.
Criterion C.6	FEMA-2008-0022-0020-057	Ashtabula County EMA, George Rolland	57 [4.4.10] would additional REP training be required of mutual aid out side of the EPZ?	Noted	Training requirements are based on ORO functions and needs. The FEMA EMI web site offers many emergency management courses, including many on-line courses (see http://training.fema.gov) Also, States offer many courses.
Criterion C.6	FEMA-2008-0022-0116-034	Nuclear Energy Institute, Alex Marion	Training for supplemental resources should be left up to the OROs	Modified	Training requirements are based on ORO functions and needs. The FEMA EMI web site offers many emergency management courses, including many on-line courses (see http://training.fema.gov) Also, States offer many courses. See the Training subsection within the Explanation section of NUREG Crtierion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0117-019	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, Criterion C.6, Pages II-23/23 et alComments: This section applies a new standard and additional evaluation area for the criterion. The additions are confusing in that there is no distinction as to the licensee and ORO responsibilities. Further this section is extremely intrusive into the ORO and adjacent possible ORO procedures. explanation/RecommendatioN: Delete all from Page II-23 line 33 to page II-24 line 25.	Rejected	It is against FEMA policy and best practices to delete the guidance on planning for HAB incidents at a NPP.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0125-009	Cumberland County Department of Public Safety, Eric Hoerner	The criterion [C.6], as implemented by the NRC through NSIR/DPR-ISG-01, INTERIM STAFF GUIDANCE, EMERGENCY PLANNING FOR NUCLEAR POWER PLANTS, will require NRC inspectors to verify ORO and AORO resources, verify mutual aid agreements (including notification, activation, training, and maintenance of duty rosters), and verify arrangements in ORO plans and/or procedures. This places NRC inspectors in a role of evaluating ORO planning and response capabilities.The existence of "State of Emergency" laws obviates the need for this new criterion. After a governor declares a State of Emergency, virtually all State resources are available for response, on a prioritized basis, to a NPP event. Further, many States have entered into regional public safety agency compacts; these agreements facilitate rapid inter-State sharing of public safety resources. There is no need for the NRC, through the licensee, to drive the generation and maintenance of additional MOUs for AORO resources.	Noted	This comment refers to the role of NRC inspectors and is beyond the scope of the current revisions to the REP Program Manual. FEMA has provided this comment to the NRC for situational awareness.
Criterion C.6	FEMA-2008-0022-0097-002	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The REP Program Manual as proposed, is too prescriptive on hostile action contingencies which infringes on day-to-day public safety capabilities that now will be evaluated under the REP.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA does not evaluate tactical response to HAB incidents or other activities during an exercise that are not directly related to one of the NUREG-0654/FEMA-REP-1 criteria.
Criterion C.6	FEMA-2008-0022-0105-016	Tennessee Emergency Management Agency, Gary Lima	Hostile Action scenario planning should be an annex to existing REP planning and where integration of planning both events is practical, should be synchronized in their operating concepts.	Noted	State and local plans may incorporate HAB planning either into the body of the plans or in an annex.
Criterion C.6	FEMA-2008-0022-0116-102	Nuclear Energy Institute, Alex Marion	In addition, due to the new exercise scenario approval requirements, NRC staff would be required to approve scenarios with implausible accident sequences and consequences. Moreover, this specific event that the NRC suggests here would require licensees to prepare for an event that far exceeds the DBT. It assumes the DBT is not mitigated and a hostile action event ensues with protracted adversarial control of the plant, resulting in a radiological release that would consume LLEA resources over an extended period of time.	Noted	OROs must plan for a wide spectrum of events that could initiate an incident at an NPP, including the possibility that an incident could exceed design specifications or that LLEA resources could be overwhelmed.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0116-011	Nuclear Energy Institute, Alex Marion	NEI believes the definition of "hostile action" inappropriately requires consideration of beyond design basis threat (DBT) scenarios without providing useful guidance defining the threat levels beyond the DBT that must be considered and planned for by licensees. Hostile action based exercises should be limited to no or minimal radioactive releases that was demonstrated during the Phase 3 Pilot in accordance with NEI 06-04, Revision 1 endorsed by the NRC (RIS 2008-08). A hostile action based event which leads to a large radioactive release is overly complicated and is a scenario that is beyond DBT and beyond responsible demonstration of adequate protection. To that end, NEI recommends that the two statements in the draft NRC ISG and NUREG-0654, Rev. 1, Supplement 4 regarding radiological releases and hostile action-based exercises be deleted.	Rejected	OROs must plan for the possibility that an incident could exceed design specifications or that LLEA resources could be overwhelmed. Hostile action based scenarios that do not require ORO response do not provide an opportunity for OROs to exercise REP capabilities, and therefore should not be used in consecutive exercises.
Criterion C.6	FEMA-2008-0022-0117-007	California Emergency Management Agency, Elaine Jennings	Each organization shall make provisions to enable onsite response support from OROs in a Hostile Action Based (HAB) incident as needed. However the discussion is much more pervasive regarding ORO and augmented OROs than is should be. The hazards and conditions cited in a HAB incident are no more challenging than a catastrophic earthquake or flood would be to the OROs. The presumption is that an HAB incident requires special preparations over an All-hazards approach to dealing with incidents.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion C.6	FEMA-2008-0022-0119-010	Progress Energy, Kenneth Heffner	What is the standard protocol (e.g. scenario freeze) to demonstrate non-REP objectives during the REP exercise?	Noted	This would be negotiated in the extent of play and the planning meetings based on OROs plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0097-021a	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-23 Lines 21-25, 27-31 and Page II-24 Lines 1-25 This point of explanation contradicts the first citation above referencing HSPD 5 where the implementation of NIMS provides for greater response consistency for ALL events. Implementation of NIMS and ICS should override the philosophy of singling out events at NPPs as unique response events and further separating REP response from that which is most effectively conducted under NIMS/ICS (most effectively because it is demonstrated daily for a range of events; not just for a biennial simulated demonstration). Any change in demands on OROs is scenario and circumstance driven. The target capabilities for incident command account for scalable response based on the scalable demands of any given scenario. The explanation assumes that OROs would only address these contingencies under the REP program and in the context of an event at a NPP. A HAB event could range from one insider to a more complicated or multi-attack scenario. How can an ORO to identify specific, sufficient resources for a wide range of attacks?	Noted	The REP program is mandated by regulations to assess the adequacy of radiological emergency plans and preparedness using specific criteria. An hostile action attack could be directed against a nuclear power plant. The guidance in Criterion C.6 is intended to address planning considerations specific to an HAB incident involving a nuclear power plant, not all possible HAB incidents.
Criterion C.6	FEMA-2008-0022-0097-021b	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	(continued) Moreover, maintenance of duty rosters is an unrealistic expectation where, in the case of LLEA, rosters of personnel are considered proprietary. Planning for and acquisition of supplemental capabilities should be no different than OROs currently implement under “Multi-agency Coordination (EOC Management)” response capability. How law enforcement and fire agencies acquire their supplemental capabilities on a day to day all-event response basis should not become the basis of a FEMA Finding. Training for supplemental resources should be left up to the OROs Further, arrangements for comp resources in a HAB event based on the premise that a general pop evacuation will be taking place at the same time resources are responding to the event at the site. Where shelter in place (“informed shelter”) would be a more appropriate response.		
Criterion C.6	FEMA-2008-0022-0101-097	Florida Division of Emergency Management, Michael Younger	III – Planning and Preparedness for HAB Events (pages 6-8) Plans and procedures should include provisions to ensure that response resources do not become an impediment to evacuation. Provisions should also be made to remove impediments for in-bound responders, including adjustments to evacuation efforts.	Noted	This language already exists in Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0116-032	Nuclear Energy Institute, Alex Marion	The explanation incorrectly assumes that the first responders to the station in response to a hostile attack are the same used for traffic control. Traffic control is not assigned to tactical forces (e.g. SWAT teams).	Noted	Particularly for sites located in rural areas, local first responders may not have separate tactical forces.
Criterion C.6	FEMA-2008-0022-0080a-006a	Pennsylvania Emergency Management Agency, Douglas Fleck	Pages II-23 and II-24 contain the details of a new criterion directing that provisions be made for OROs to provide on-site support in the event of a hostile action-based incident. These provisions to support already exist under an “unmet needs” concept at the local and state level. Regardless of procedures that are already in effect at the local level the newly invented HAB scenario has created an uncontrollable mania at the federal level that cannot be resolved until detailed, but unverifiable procedures are put in place. The HAB concept fails on two levels. First, for nearly 30-years we have been assuring the general public that security at a nuclear power plant is robust enough to defeat a design basis threat. Now, with the creation of HAB, we are telling them, “Oops, we could be wrong about that, but we will continue to evaluate security under the old criteria and put the burden of picking up the pieces if and when it fails on the OROs.” This is not very reassuring to the public and will give the anti-nuclear activists an unlimited supply of future talking points.	Rejected	As discussed in Part I.B.3 of the REP Program Manual, the NRC determined that the emergency preparedness basis for nuclear power plants remains valid even for hostile action incidents. However, FEMA recognizes that such events present unique challenges to EP programs. Criterion C.6 has been added to ensure that OROs plan for the possibility that an HAB incident could exceed design specifications or that LLEA resources could be overwhelmed.
Criterion C.6	FEMA-2008-0022-0080a-006b	Pennsylvania Emergency Management Agency, Douglas Fleck	(continued)Second, you can write all of the plans and non-binding agreements you want between OROs and on-site entities, but the harsh, immutable fact is that until the event occurs there is no way to predict what will be available. If the past is indeed prologue it is easy to see that modern terrorists have shown the desire and capability to strike multiple targets simultaneously. Our national agencies have stated that they are most likely to continue to attempt such operations in the future. It is ridiculous to commit assets via planning, LOAs, and MOUs without first knowing the extent of need. In a situation where terrorists strike a nuclear power plant while simultaneously striking other facilities and venues with high civilian populations (schools, sporting events, concerts, etc,) would there be any doubt as to what target would get the highest priority on ORO assets? A hardened, SCRAMed nuclear plant with its own guard force or a school full of kids? Recommend this entire criterion be deleted. Immediate response to local emergencies is best handled by local emergency management agencies with the all-hazards procedures they already have in place and experience and practice regularly.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0080a-006c	Pennsylvania Emergency Management Agency, Douglas Fleck	(continued)They are the experts in this field – not bureaucrats at the national level.you want between OROs and on-site entities, but the harsh, immutable fact is that until the event occurs there is no way to predict what will be available. If the past is indeed prologue it is easy to see that modern terrorists have shown the desire and capability to strike multiple targets simultaneously. Our national agencies have stated that they are most likely to continue to attempt such operations in the future. It is ridiculous to commit assets via planning, LOAs, and MOUs without first knowing the extent of need. In a situation where terrorists strike a nuclear power plant while simultaneously striking other facilities and venues with high civilian populations (schools, sporting events, concerts, etc,) would there be any doubt as to what target would get the highest priority on ORO assets? A hardened, SCRAMed nuclear plant with its own guard force or a school full of kids? Recommend this entire criterion be deleted. Immediate response to local emergencies is best handled by local emergency management agencies with the all-hazards procedures they already have in place and experience and practice regularly. They are the experts in this field – not bureaucrats at the national level.		
Criterion C.6	FEMA-2008-0022-0100-009	Pennsylvania Emergency Management Agency, Henry Tamanini	Pages II-23 and II-24 contain the details of a new criterion directing thatprovisions be made for Off-site Response Organizations (OROs) to provide onsite support in the event of a hostile action-based incident. We believe that these provisions currently exist in terms of “mutual-aid” agreements and applicable laws/regulations governing law enforcement, fire, rescue, and emergency medical services and response. We recommend that this section be rewritten to accommodate for jurisdictions which have the provisions already identified.	Modified	The REP Program Manual is designed to offer guidance to all affected stakeholders within the REP program on how to meet the Planning Standard. Existing provisions could satisfy the intent of this criterion. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0108-026	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-24 Line: 15 Comment: "Just in time training." There are so many different actions that could use "just in time training." How does one include provisions for every one in plans and procedures? It is items such as this that bog down the plans and procedures.	Noted	The REP Program Manual does not require planning for every possibility. The cited text refers specifically to HAB events when alternate personnel are expected. ORO plans should be scalable to identify where just-in-time training is appropriate.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0079-020	Delaware Emergency Management Agency, James Turner	NUREG-0654/FEMA REP-1 Supplemental 4 Page 7 Issue: HAB scenarios are likely to affect the notification and activation of the normally available primary response staff, OROs should also address the timeliness of activating the alternate personnel. While notification times for alternatives may not need to be the same as for the primary, a reasonable effort should be made to develop timely activation through callout rosters or other methods normally used by the ORO. This effort should be automatically implemented when the emergency action level and event classification indicate that there is an HAB event that would take the ORO resources away from normally assigned roles and responsibilities in the emergency response plan. Basis/Comment: This statement doesn't really say anything much different than what would take place during notification and activation for a techno-accident cased scenario.	Noted	This comment speaks to the NRC's definition of hostile action and is beyond the scope of the current revisions to the REP Program Manual. FEMA has provided this comment to the NRC for situational awareness.
Criterion C.6	FEMA-2008-0022-0130-024	State of Vermont, Barbara Farr	NUREG-0654 FEMA REP-1 SUPPLEMENT 4 PAGE 7: HAB scenarios are likely to affect the notification and activation of the normally available primary response staff, ORO's should also address the timeliness of activating the alternate personnel. While notification times for alternates may not need to be to the same as for the primary, a reasonable effort should be automatically implemented when the EAL and Event Classification indicate that there is an HAB event that would take ORO's resources away from normally assigned roles and responsibilities in the emergency response plan.BASIS / COMMENTSThis statement doesn't say anything that would normally take place for activation for a techno-accident based scenario.	Noted	This comment speaks to the NRC's definition of hostile action and is beyond the scope of the current revisions to the REP Program Manual. FEMA has provided this comment to the NRC for situational awareness.
Criterion C.6	FEMA-2008-0022-0108-025	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II.24 Line: 19-25 Comment: Should this occur even if the event is a NOUE?	Noted	Jurisdictions set their own procedures at NOUE. HAB scenarios will generally start at Alert, SAE or GE.
Criterion C.6	FEMA-2008-0022-0108-197	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 7 - III - "A reasonable effort should be made to develop timely activation." How will this be evaluated?	Noted	See "timely" in the REP Program Manual glossary.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0108-024	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II.24 Line: 17 Comment: Why is necessary to maintain "additional duty rosters of qualified alternate personnel?" Can there not be one roster with qualified primary AND alternate personnel for an HAB?	Modified	These lists may be combined as long as primary and alternate personnel are identified. REP Program Manual language clarified. See the Rosters subsection within the Explanation section of NUREG Crtierion C.6 in Part II.C - Planning Guidance.
Criterion C.6	FEMA-2008-0022-0106-049	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-24, Lines 21 - 25Comment: Lines 21 and 22 state, "While notification times for alternates [response personnel] may not need to be the same as for the primary [response personnel], a reasonable effort should be made to develop timely activation through call-out rosters or other methods..." Then lines 23-24, state, "This effort should be automatically implemented when the emergency action level and event classification level indicate there is a HAB event that would take the ORO resources away form normally assigned roles and responsibilities..." Confusing... "Timely Activation" or "Automatically" States and Locals may not know the emergency action level and event classification level or that it's a HAB event. Further, this goes against NIMS principles of Command and Control.	Modified	The REP Program Manual text has been modified to remove the language regarding timeliness of activating alternate personnel. The The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0101-096	Florida Division of Emergency Management, Michael Younger	III – Planning and Preparedness for HAB Events (pages 6-8) Automatic implementation of personnel callouts leaves little room for assessment and decision-making to determine the need for additional resources. Automatic actions could increase confusion and become counterproductive if normal direction and control channels are bypassed. This ndermines normal response protocols for an all hazards (including hostile action events) planning approach. Further, it may dictate one course of action when another may be more practical based on the ongoing assessment of the event.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0102-007	Entergy Nuclear Operations, Inc., Michael Slobodien	Section III Page 7, Paragraph 4 We suggest deletion of the “automatically implemented” wording in reference to notification and activation of emergency response personnel.Rationale: “Automatic” implementation of personnel callouts leaves little room for assessment and decision-making to determine the need for additional resources. Automatic actions could add increased confusion and become counter-productive if normal direction and control channels are bypassed.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion C.6	FEMA-2008-0022-0121-046	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-24 Line: 22-25 Comments: It states that this is automatic when an EAl and event classification indicates that ORO resources would be taken away. When is it determined that ORO resources will be depleted, in the pre-planning stage or during the incident? It appears that this will be in pre-planning with a direct connection to an EAl. If this is so, who makes this decision and how does this authority measure the amount of resources available and which resources to assess? Nothing should be dictated to be "automatic" at an Eel not even a specific protective action.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0086-007	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-24, line 23: Comments: Instead of the actions being "automatic" as described, the recommendation should state that the means for notifying supplemental response personnel should be readily available if required by the emergency direction and control function.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0102-021	Entergy Nuclear Operations, Inc., Michael Slobodien	C.6 Page II-24, line 23, refers to automatic implementation of notification methods when the ECL or EAL indicates that there is a HAB event that would take ORO resources from normallyassigned responsibilities. Comments: Instead of the actions being “automatic”, it should state that the means for notifying supplemental response personnel should be readily available if required by the emergency direction and control function.Rationale: Comment provided for clarification purposes.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0130-008	State of Vermont, Barbara Farr	II-24: the wording of “automatically”Basic CommentsThe word automatic is not in line with the Incident Command System. This should be addressed in the approved State Plan and Standard Operating Procedures (SOP’s). Remove “automatically” from line 23.	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0020-008	Ashtabula County EMA, George Rolland	Page Ref. II-24 Comment: Line 23 thru 25 indicates that "automatic" actions would need to be taken. Automatic actions are not in line with Command and Control schemes. Comment by: Locals	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0021-008	Geauga County DES, Dale Wedge	Page Ref. II-24 Comment: Line 23 thru 25 indicates that "automatic" actions would need to be taken. Automatic actions are not in line with Command and Control schemes. Comment by: Locals	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.
Criterion C.6	FEMA-2008-0022-0036-008	Lake County EMA, Larry Greene	Page Ref. II-24 Comment: Line 23 thru 25 indicates that "automatic" actions would need to be taken. Automatic actions are not in line with Command and Control schemes. Comment by: Locals	Modified	The REP Program Manual has been modified to remove the term "automatically." See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance. See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard D					
Criterion D.1 (licensee only)					
Criterion D.1 (licensee only)	FEMA-2008-0022-0128-008	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-25, lines 01-10: This section requires the establishment of an emergency classification system by the licensee.COMMENTs: This section provides requirements for licensees only and is inappropriately placed in this document. Responsibility for the evaluation and enforcement of this requirement lies with the NRC.Explanation/Recomendation: Delete criteria D.1 and D.2 as these do not apply to OROs.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.1 (licensee only)	FEMA-2008-0022-0109-012	Ottawa County, Ohio, Koch Beth	page II-25, lines 01-10:COMMENT: This section provides requirements for licensees only and is inappropriately placed in this document.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.1 (licensee only)	FEMA-2008-0022-0102-022	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-25, Lines 1-10: Criteria D.1 and D.2 apply to licensees only and not to OROs. These should be deleted.Rationale: The stated intent for this guidance is to apply only to OROs. Criteria D.1 and D.2 are governed under NRC regulations.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.1 (licensee only)	FEMA-2008-0022-0116-035	Nuclear Energy Institute, Alex Marion	Part II.C, D.1., p.II-25, (lines 01-10): Delete criteria D.1 and D.2 as these do not apply to OROs.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.1 (licensee only)	FEMA-2008-0022-0097-022	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	PageII-25, Lines 01-10): This section requires the establishment of an emergency classification system by the licensee. This action is delineated in regulations and is inappropriately placed hereCOMMENT: Delete criteria D.1 and D.2 as these do not apply to OROs.BASIS: This section provides requirements for licensees only and is inappropriately placed in this document. Responsibility for the evaluation and enforcement of this requirement lies with the NRC.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.1 (licensee only)	FEMA-2008-0022-0109-013	Ottawa County, Ohio, Koch Beth	page II-25, lines 7:COMMENT: All endorsed methodologies and EAL schemes which may have been approved by the NRC should be included.	Noted	Information on alternative Emergency Action Level methodologies is referenced in a footnote to Criterion D.4. However, please note that development of Emergency Action Levels is a licensee responsibility. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee.
Criterion D.1 (licensee only)	FEMA-2008-0022-0086-009	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-25, line 11: Comments: It is not clear whether available automatic dial-up ("reverse 911 ") systems are included as an acceptable technical option. These systems are widely available and robust, and should be listed as acceptable options.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.1 (licensee only)	FEMA-2008-0022-0102-023	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-25, Lines 21-22: Criteria D.1 and D.2 apply to licensees only and not to OROs. These should be deleted.Rationale: The stated intent for this guidance is to apply only to OROs. Criteria D.1 and D.2 are governed under NRC regulations.	Rejected	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.3					
Criterion D.3	FEMA-2008-0022-0109-014	Ottawa County, Ohio, Koch Beth	page 25, lines 29-30):COMMENT: Licensee classification schemes are reviewed with state and local agencies. Responsibility should remain with the licensee.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Licensees are responsible for developing an emergency classification scheme. Criterion D.3 addresses ORO responsibility for developing a scheme consistent with that of the licensee.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.3	FEMA-2008-0022-0080-007	Douglas Fleck	Page II-26, Lines 3-6 correctly lists the four emergency classes as Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency. I realize that this has been in effect since the inception of the REP program, but since this appears to be a time of change perhaps it is time to give the emergency classes less cumbersome and confusing names. Defensive Conditions 1-5 seem to work for the military and a color coding system has served the Department of Homeland Security since the aftermath of the 9/11 attacks. The four emergency classes in use now are too long and unclear to the ORO emergency workers and the general public. Words like event, site, and emergency are used daily in the vernacular of any emergency management agency. In nearly every biennial REP exercise this commonwealth participates in there is inevitable confusion between Site Area Emergency, General Emergency, and Declaration or Proclamation of Disaster Emergency (presidential or gubernatorial) to give just one example. Surely it should not be difficult to convert the emergency classes from the technician/engineer type wording it is presently in to a more user friendly system for laymen who do not operate in this environment on a regular basis, but are nevertheless tasked to respond and mitigate when something goes wrong.	Rejected	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.The revision of the emergency classification levels is not part of the current rulemaking; however, the commenter's suggestion has been noted for future consideration. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.3	FEMA-2008-0022-0100-010	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-26, Lines 3-6 lists the current emergency classification as Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency. We believe that consideration should be given to the modification of the emergency classification “terms” to further avoid instances of confusion resulting from the use of similar terms. Terms such as Site Area Emergency, General Emergency, and Disaster Emergency have the potential for misinterpretation during emergency situations.	Rejected	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.The revision of the emergency classification levels is not part of the current rulemaking; however, the commenter's suggestion has been noted for future consideration. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.3	FEMA-2008-0022-0080a-007	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-26, Lines 3-6 correctly lists the four emergency classes as Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency. I realize that this has been in effect since the inception of the REP program, but since this appears to be a time of change perhaps it is time to give the emergency classes less cumbersome and confusing names. Defensive Conditions 1-5 seem to work for the military and a color coding system has served the Department of Homeland Security since the aftermath of the 9/11 attacks. The four emergency classes in use now are too long and unclear to the ORO emergency workers and the general public. Words like event, site, and emergency are used daily in the vernacular of any emergency management agency. In nearly every biennial REP exercise this commonwealth participates in there is inevitable confusion between Site Area Emergency, General Emergency, and Declaration or Proclamation of Disaster Emergency (presidential or gubernatorial) to give just one example. Surely it should not be difficult to convert the emergency classes from the technician/engineer type wording it is presently in to a more user friendly system for laymen who do not operate in this environment on a regular basis, but are nevertheless tasked to respond and mitigate when something goes wrong	Rejected	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote.The revision of the emergency classification levels is not part of the current rulemaking; however, the commenter's suggestion has been noted for future consideration. FEMA has provided this comment to the NRC for situational awareness.
Criterion D.4					
Criterion D.4	FEMA-2008-0022-0106-050	Nebraska Emergency Management Agency, Jonathan Schwarz	It's time D.4 be deleted or revised. As required by the NRC, nuclear power stations normally give the standard evacuate 360 degrees out to 2 miles and 5 miles down wind in sectors such and such or something equivalent. Most OROs now use subareas which use landmarks that would be recognized by the general public. As such, what the nuclear power station recommends may not matter, for the sub-areas could include additional area beyond the sectors recommended by the nuclear power station. In addition, nuclear power stations must still use the standard evacuation model recommendation, dispite the fact it may be a HAB event and require States and Locals to keep the public sheltered where they are, in order to allow responders to quickly gain access to the the bad guys. Finally, it is the sole responsibilty of the States and locals to determine protective actions for its public, not NRC, not FEMA and not the nuclear power stations.Potential Impact: Continuing confusion especially for exercising a HAB event.	Modified	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.4	FEMA-2008-0022-0073-013	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-26Comment: D.4: Criterion needs to account for differences in where the decision-making authority lies. This differs from state to state. In Washington, the county makes the protective action decisions during the Plume phase. This authority derives from the state constitution. During the Ingestion phase the State assumes control and makes the decisions, again this is based on the state constitution. Oregon is different in that the state makes the protection action decisions during all phases of an emergency.Potential Impact: Requires Federal Emergency Management Agency (FEMA) Radiological Assistance Committee (RAC) Chairpersons to ensure that evaluators are briefed on regional (or even state to state) differences in decision-making and why procedures may differ between response organizations in the same region. RECOMMENDATION: It is crucial for the RAC Chair (or designee) to ensure evaluators a provided ORO plans and procedures with enough time for the evaluator to understand exactly how each specific ORO executes their response.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate.
Criterion D.4	FEMA-2008-0022-0105-004	Tennessee Emergency Management Agency, Gary Lima	Hostile Action Drills (HAD) – Tennessee has exercised the terrorist threat (see attached.) The major concern is using the same ECLs for “HAD” as are used for REP. Evacuation during a General Emergency due to hostile action is not necessary and may even impede Fire, Law Enforcement and EMS from responding to the target area via evacuation routes. A release of radio nuclides is a separate event from hostile action. An ECL that addresses Security Based/Hostile Actions must be separate and distinct language. Our citizens do not need to pile onto roads right in the middle of the enormous law enforcement, EMS and fire fighter first responders. This occurring response is heavily integrated under mutual aid agreements mandated by Tennessee law. Announcing a General Emergency announces a plume to our citizens and they expect to evacuate; many of whom may self evacuate during a Site Area Emergency, all of which complicates the non REP event response.The ECL needs to change for hostile actions or threat based scenarios to a term distinctly security based.	Noted	See the REP Program Manual explanation under Criterion D.4, "…unless other conditions make evacuation dangerous." A release of radionuclides could result from a hostile action. PARs should not be based on ECL alone and should always take all relevant conditions into consideration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.4	FEMA-2008-0022-0097-023	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 26, Lines 28-29): This section only acknowledges NUREG- 0654 for EAL classification schemes.COMMENT: The section under D.3 only references NUREG 0654 EAL schemes. This section should be revised to include all endorsed methodologies as well as EAL schemes which may have been approved by the NRC. One approach would be to acknowledge those EAL schemes that have been endorsed under Reg Guide 1.101 and any other site specific NRC Approved EAL schemes.BASIS: The recommended approach encompasses NuREG-0654 Appendix I and all othercurrently approved EAL schemes while providing continued guidance for evaluation by referencing the dynamic approval document/authority for EALs.	Noted	Information on alternative Emergency Action Level methodologies is referenced in a footnote to Criterion D.4. However, please note that development of Emergency Action Levels is a licensee responsibility. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee.
Criterion D.4	FEMA-2008-0022-0116-036	Nuclear Energy Institute, Alex Marion	Part II.C, D.3, p.26, (lines 28-29): The section under D.3 only references NUREG 0654 EAL schemes. This section should be revised to include all endorsed methodologies as well as EAL schemes which may have been approved by the NRC. One approach would be to acknowledge those EAL schemes that have been endorsed under Reg. Guide 1.101 and any other site specific NRC Approved EAL schemes.	Noted	Information on alternative Emergency Action Level methodologies is referenced in a footnote to Criterion D.4. However, please note that development of Emergency Action Levels is a licensee responsibility. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee.
Criterion D.4	FEMA-2008-0022-0109-015	Ottawa County, Ohio, Koch Beth	page 26, lines 28-29:COMMENT: NUREG-0654 Appendix I and all other currently approved EAL schemes should be cited.	Noted	Information on alternative Emergency Action Level methodologies is referenced in a footnote to Criterion D.4. However, please note that development of Emergency Action Levels is a licensee responsibility. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee.
Criterion D.4	FEMA-2008-0022-0116-004	Nuclear Energy Institute, Alex Marion	NEI also recommends that FEMA develop planning guidance for offsite authorities to direct the public to take shelter in the event of a hostile action event and to remain cognizant of conditions (i.e., listen to EAS broadcast) and additional public protective action instructions as the event develops.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. It is important to recognize that it is the OROs, not FEMA or NRC, who decide what protective actions are appropriate to protect the health and safety of the public. Even though OROs prepare emergency plans with pre-authorized PADs tied to plant ECLs, OROs always have the right and responsibility to make different PADs if appropriate for the specifics of the incident. See REP Program Manual explanation under Evaluation Criterion D.4, which discusses evacuation "…unless other conditions make evacuation dangerous."
Criterion D.4	FEMA-2008-0022-0108-027	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-26 Line: 31-33 Comment: If FEMA is no longer maintains the "philosophy" of Appendix 1 of NUREG-0654/FEMA-REP-1's sheltering in place, then FEMA should append the document.	Modified	The entire sentence has been deleted. Supplement 3 is currently under revision and will include updated recommendations on preferred actions. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.4	FEMA-2008-0022-0087-008	South Carolina Emergency Management Division, Danny Loomis	Page 11-26: "Current FEMAand NRC Philosophy" term is used on line 33. Shouldn't this be "Guidance"? (Just to be consistent...)	Modified	The entire sentence has been deleted. Supplement 3 is currently under revision and will include updated recommendations on preferred actions. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0130-009	State of Vermont, Barbara Farr	II-27: the wording schools “will be” and that Response Centers and EAS Stations “will be” at an ALERT Status brought to standby status.Basic CommentsWording should be that schools “may be” relocated and Response Centers and EAS “may be” at the discretion of the Jurisdictional Agency and based on their approved plan.	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0127-004	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page II-27 lines 4-7: Comment: This statement is very likely to be misconstrued by some as a hard and fast requirement that dictates exclusively what actions are appropriate to protect the public at a given emergency classification level. Taken to such a minute level of detail the need for decision making or decision making evaluation for that matter is minimized if not removed from the process. To presume that plans and procedures should attempt to enumerate all possible “appropriate emergency actions to be considered or taken to protect the public at each ECL” is beyond the intent of this document or the RERP Program. Such detail obviates the need for evaluation of the protective action decision making capability or the need for the program.	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0106-051	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-27, Lines 4 - 7Comment: "The plans/procedures should indicate the appropriate emeregency action…" The word "appropriate" is subjective. The example given is poor.Potential Impact: Provides leeway for disagreement as to what is appropriate action between NRC/FEMA and States/Locals.	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0108-028	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-27 Line: 4-7 Comment: The plans/procedures are to include appropriate emergency actions at each ECL, given the local conditions. For example, in the case of a hostile event at SAE, one might not be evacuated. There are too many "local conditions" to plan for each and each ECL. During a hostile action, one might shelter the 2-mile and evacuate the 5-mile. How is it expected for plans/procedures to maintain a flexibility for direction/control? Other than the FEMA recommendation emergency actions, what is expected to be contained in the plan/procedure?	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.4	FEMA-2008-0022-0079-007	Delaware Emergency Management Agency, James Turner	Part II Page 27 Issue: Wording states schools will be. Also states at Alert, primary response centers and EAS stations will be brought to standby status. Basis/Comment: Wording should state schools may be relocated. Also states at Alert, primary response centers and EAS stations may be brought to standby status at the discretion of the Authority Having Jurisdiction (AHJ) and based on their approved plan.	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0097-024	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Offsiteprocedures for taking emergency actions which are consistent with emergency actions recommended by the licenseeCOMMENT: The explanation section contains the statement that the plans/procedures should indicate the appropriate emergency actions to be taken to protect the public at each ECL, given the local conditions at the time of the emergency. For example, at a SAE, schools will be evacuated and, at Alert, primary emergency response centers and EAS stations will be brought to standby status. This guidance should be rephrased or deleted. Suggest deletion of last sentence of second paragraph of explanation: “for an example, at an SAE schools should be evacuated…..” This can be construed as guidance.BASIS: The explanatory statement can be read as guidance to evacuate schools at an SAE. If this is the intent, it is not appropriate. OROs would not necessarily implement school evacuations at an SAE.	Accepted	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the bullet list under Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0116-037	Nuclear Energy Institute, Alex Marion	Part II, Criterion D.4 - The explanation section contains the statement that the plans/procedures should indicate the appropriate emergency actions to be taken to protect the public at each ECL, given the local conditions at the time of the emergency. For example, at a SAE, schools will be evacuated and, at Alert, primary emergency response centers and EAS stations will be brought to standby status. This guidance should be re-phrased or deleted. Suggest deletion of last sentence of second paragraph of explanation: “for an example, at an SAE schools should be evacuated…..” This can be construed as guidance.Basis: The explanatory statement can be read as guidance to evacuate schools at an SAE. If this is the intent, it is not appropriate. OROs would not necessarily implement school evacuations at an SAE.	Accepted	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the bullet list under Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0020-009	Ashtabula County EMA, George Rolland	Page Ref. II-27 Comment: Example provided on lines 5 thru 7 is poor. Suggestion on wording: "For example, at a SAE, schools may be relocated and at ALERT, primary response centers and primary EAS stations may be brought to Standby status." Comment by: Locals	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion D.4	FEMA-2008-0022-0021-009	Geauga County DES, Dale Wedge	Page Ref. II-27 Comment: Example provided on lines 5 thru 7 is poor. Suggestion on wording: "For example, at a SAE, schools may be relocated and at ALERT, primary response centers and primary EAS stations may be brought to Standby status." Comment by: Locals	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0036-009	Lake County EMA, Larry Greene	Page Ref. II-27 Comment: Example provided on lines 5 thru 7 is poor. Suggestion on wording: "For example, at a SAE, schools may be relocated and at ALERT, primary response centers and primary EAS stations may be brought to Standby status." Comment by: Locals	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0109-024	Ottawa County, Ohio, Koch Beth	page II-27, lines 5-7): For example, at a SAE, schools will be evacuated and at Alert, primary response centers and EAS stations will be brought to standby status.COMMENT: Change “will be” to “may be”.	Modified	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0121-047	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-27 Line: 6 Comments: Schools are relocated not evacuated.	Noted	Emergency actions are specific to ORO plans/procedures. The cited example has been deleted. See the Explanation Section of Evaluation Criterion D.4 in Part II.C - Planning Guidance.
Criterion D.4	FEMA-2008-0022-0020-010	Ashtabula County EMA, George Rolland	Page Ref. II-28 Comment: Verification is discussed but unclear as to which notification/verification. If it is the faxing of a notification form after phone call is made or is it the HAB daily password verification process? Page II-29 lines 22 - 24 indicates that it is the HAB process so the licensee would be okay but OROs do not get the NRC password nor do they have an established process to verify that the FBI or other gov agency is the entity calling. Comment by: Locals	Noted	LLEAs already have established verification procedures specific to the local jurisdiction. Main concern is that some means of verification exists.
Criterion D.4	FEMA-2008-0022-0021-010	Geauga County DES, Dale Wedge	Page Ref. II-28 Comment: Verification is discussed but unclear as to which notification/verification. If it is the faxing of a notification form after phone call is made or is it the HAB daily password verification process? Page II-29 lines 22 - 24 indicates that it is the HAB process so the licensee would be okay but OROs do not get the NRC password nor do they have an established process to verify that the FBI or other gov agency is the entity calling. Comment by: Locals	Noted	LLEAs already have established verification procedures specific to the local jurisdiction. Main concern is that some means of verification exists.
Criterion D.4	FEMA-2008-0022-0036-010	Lake County EMA, Larry Greene	Page Ref. II-28 Comment: Verification is discussed but unclear as to which notification/verification. If it is the faxing of a notification form after phone call is made or is it the HAB daily password verification process? Page II-29 lines 22 - 24 indicates that it is the HAB process so the licensee would be okay but OROs do not get the NRC password nor do they have an established process to verify that the FBI or other gov agency is the entity calling. Comment by: Locals	Noted	LLEAs already have established verification procedures specific to the local jurisdiction. Main concern is that some means of verification exists.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard E					
Criterion E.1					
Criterion E.1	FEMA-2008-0022-0093-020	Texas Department of State Health Services, Bob Free	Page II-28, Lines 19-21: NUREG Criterion E.1 The following sentence is not complete: Governmental units may also be responsible for notifying another (e.g., the licensee notifies the State and the State notifies the local governments, or a risk county notifies its supporting host county).	Accepted	The REP Program Manual has been amended to read "one another" instead of "another." See the explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.
Criterion E.1	FEMA-2008-0022-0116-038	Nuclear Energy Institute, Alex Marion	Part II.C, E.1 Explanation: p. II-28 (lines 29-42) p. II-29 (lines 1-12) Part II.C, E.1: Delete referenced lines in the explanation. Criterion E.1 is intended to ensure that a prompt, clearly understood notification of an emergency classification is made by the licensee to a 24 hour offsite warning point. The added guidance expands on this original intent and is not appropriate. The explanation in the lines cited describe initial communication between law enforcement and station security that are governed by the respective protocols PRIOR to entry in a REP classified event.	Rejected	The explanation under Evaluation Criterion E.1 is not intended to require OROs specify entities within the notification chain in their plans. However, examples of the different notification options, including the potential direct contact with local law enforcement, are relevant considerations for HAB incidents. The general process should be included in the ORO plans, but the specific details are not required. The REP Program Manual is not recommending that any safeguarded law-enforcement-sensitive information be included in plans/procedures. In a HAB incident, there needs to be a system in the plans/procedures for notifying the entire ORO emergency response organization.
Criterion E.1	FEMA-2008-0022-0117-020	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, Planning Standard E – Notification Methods and Procedures, Criterion E.1 pages II-28 and 29 (inclusive)Comments: The direction to establish communication and verification processes with every LLEA and Federal center should not be accomplished by the licensee, state or local. This should be a federal mandate for all such centers, agencies, councils, and whoever else could be notified of a risk at a NPP to notify the affected NPP and/or the NRC of the risk. Such notification to the licensee could originate out of state at some entity that may not be subject to the affected state's procedures. Or jurisdiction.explanation/RecommendatioN: Compel the NRC and FEMA to establish a federal requirement for all such contact points nationwide to notify the affected NPP and/or the NRC of any HAB threat identified not by the ORO or NPP. This process will streamline the response and eliminate confusion. Delete all references in this section that would be affected by the new federal mandate.	Rejected	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The comment has been shared with NRC and noted for consideration in future rulemaking.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0113-013	North Carolina Division of Emergency Management, Stephen Payne	Page II-28, Lines 29-42; Page II-29, Lines 1-12RECOMMENDATION/COMMENT: DELETE SECTION OR REWORDBASIS:This information is in addition to the standard notification process for ECL and should be included as part of NUREG 0654/FEMA Sup 4 dealing with Hostile Action Events. As this information is very specific to Hostile Actions, it should be moved to the end of the explanation to avoid confusion with the information required for ALL events	Noted	Existing text clearly indicates HAB event applicability.
Criterion E.1	FEMA-2008-0022-0080-008	Douglas Fleck	Page II-28, Lines 29-37 require a licensee to notify LLEA points of contact. Like any other customer calling for assistance from fire or police the licensee should notify the ORO's 911 center and allow the ORO managers to decide how to respond. It is unclear why this tried and proven method of requesting assistance works for every other entity except a nuclear power plant. It is utterly unacceptable for a licensee to directly contact emergency responders. Not only does it violate protocols, but it runs the risk of having an ORO asset employed without the local emergency management agency being initially aware that its assets are being used and unavailable for other missions. Recommend this passage be reworded to clarify that licensees will make all such notifications and requests through the local 911 center or based upon the OROs plans.	Modified	The REP Program Manual has been amended as follows: "In an HAB incident, a licensee is required to notify OROs in accordance with onsite plans/procedures, irrespective of emergency classification level." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.
Criterion E.1	FEMA-2008-0022-0100-011	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-28, Lines 29-37 require a licensee, in a Hostile Action Based event, to notify the Local Law Enforcement Agencies (LLEAs) based on the licensee's security contingency plan irrespective of the emergency classification level. We recommend that this be reworded to ensure that such notifications and requests for emergency assistance are made via the appropriate 9-1-1 center/24 hour warning point or as based upon the OROs plans.	Modified	The REP Program Manual has been amended as follows: "In an HAB incident, a licensee is required to notify OROs in accordance with onsite plans/procedures, irrespective of emergency classification level." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0080a-008	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-28, Lines 29-37 require a licensee to notify LLEA points of contact. Like any other customer calling for assistance from fire or police the licensee should notify the ORO's 911 center and allow the ORO managers to decide how to respond. It is unclear why this tried and proven method of requesting assistance works for every other entity except a nuclear power plant. It is utterly unacceptable for a licensee to directly contact emergency responders. Not only does it violate protocols, but it runs the risk of having an ORO asset employed without the local emergency management agency being initially aware that its assets are being used and unavailable for other missions. Recommend this passage be reworded to clarify that licensees will make all such notifications and requests through the local 911 center or based upon the OROs plans.	Modified	The REP Program Manual has been amended as follows: "In an HAB incident, a licensee is required to notify OROs in accordance with onsite plans/procedures, irrespective of emergency classification level." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.
Criterion E.1	FEMA-2008-0022-0086-008	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-28, lines 31-30, and Page 11-29 lines 1-8: Comments: The intent of Criterion E.1 is to ensure that a prompt, clearly understood notification of an emergency classification is made by the licensee to a 24-hour offsite warning point. The added guidance expands on this original intent and is not appropriate. The explanation in the lines cited describe initial communication between law enforcement and station security that are governed by the respective protocols prior to entry in a REP classified event. The types of notification processes described here are normally proprietary and beyond the scope of the REP Program. Such protocols are established under the jurisdiction of law enforcement and homeland security entities. Such notification details are not appropriate in a public document. It is recommended that the referenced lines be deleted in the explanation.	Rejected	The explanation under Evaluation Criterion E.1 is not intended to require OROs specify entities within the notification chain in their plans. However, examples of the different notification options, including the potential direct contact with local law enforcement, are relevant considerations for HAB incidents. The general process should be included in the ORO plans, but the specific details are not required. The REP Program Manual is not recommending that any safeguarded law-enforcement-sensitive information be included in plans/procedures. In a HAB incident, there needs to be a system in the plans/procedures for notifying the entire ORO emergency response organization.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0097-025	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-28 Lines 29-42 PageII-29 Lines 1-12COMMENT: Delete referenced lines in the explanation. Criterion E.1 is intended to ensure that a prompt, clearly understood notification of an emergency classification is made by the licensee to a 24 hour offsite warning point. The added guidance expands on this original intent and is not appropriate. The explanation in the lines cited describe initial communication between law enforcement and station security that are governed by the respective protocols PRIOR to entry in a REP classified event.BASIS: This guidance is misplaced and does not belong in REP. The notification protocolsdescribed here are beyond the bounds of the REP Program and are under the jurisdiction of each state's law enforcement and homeland security entities. Further, details of notification procedures would be considered proprietary and are not appropriate in a public document.	Rejected	The explanation under Evaluation Criterion E.1 is not intended to require OROs specify entities within the notification chain in their plans. However, examples of the different notification options, including the potential direct contact with local law enforcement, are relevant considerations for HAB incidents. The general process should be included in the ORO plans, but the specific details are not required. The REP Program Manual is not recommending that any safeguarded law-enforcement-sensitive information be included in plans/procedures. In a HAB incident, there needs to be a system in the plans/procedures for notifying the entire ORO emergency response organization.
Criterion E.1	FEMA-2008-0022-0102-024	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-28, Lines 31-39, and Page II-29, Lines 1-8: The intent of Criterion E.1 is to ensure that a prompt, clearly understood notification of an emergency classification is made by the licensee to a 24 hour offsite warning point. The added guidance expands on this original intent and is not needed. The explanation in the lines cited describe initial communication between law enforcement and station security that are governed by the respective protocols prior to entry in a REP classified event. It is recommended that the referenced lines be deleted in the explanation.Rationale: Discussion of potential notification processes described here may contain security sensitive information and should not be included in the scope of the REP Program Manual. These protocols are under the jurisdiction of law enforcement and homeland security entities. Such notification details may not be appropriate in a public document.	Rejected	The explanation under Evaluation Criterion E.1 is not intended to require OROs specify entities within the notification chain in their plans. However, examples of the different notification options, including the potential direct contact with local law enforcement, are relevant considerations for HAB incidents. The general process should be included in the ORO plans, but the specific details are not required. The REP Program Manual is not recommending that any safeguarded law-enforcement-sensitive information be included in plans/procedures. In a HAB incident, there needs to be a system in the plans/procedures for notifying the entire ORO emergency response organization.
Criterion E.1	FEMA-2008-0022-0020-011	Ashtabula County EMA, George Rolland	Page Ref. II-28 Comment: Line 34 - 37 indicates that OROs may have information that the Licensee does not and needs a method to notify the Licensee. Is this what is intended here? Comment by: Locals	Noted	Correct, OROs may have information that the Licensee does not have and need a method to notify the Licensee.
Criterion E.1	FEMA-2008-0022-0021-011	Geauga County DES, Dale Wedge	Page Ref. II-28 Comment: Line 34 - 37 indicates that OROs may have information that the Licensee does not and needs a method to notify the Licensee. Is this what is intended here? Comment by: Locals	Noted	Correct, OROs may have information that the Licensee does not have and need a method to notify the Licensee.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0036-011	Lake County EMA, Larry Greene	Page Ref. II-28 Comment: Line 34 - 37 indicates that OROs may have information that the Licensee does not and needs a method to notify the Licensee. Is this what is intended here? Comment by: Locals	Noted	Correct, OROs may have information that the Licensee does not have and need a method to notify the Licensee.
Criterion E.1	FEMA-2008-0022-0101-030	Florida Division of Emergency Management, Michael Younger	Page II-28, lines 34-37 This should be separated from the paragraph dealing with HAB notifications and made broader to emphasize the importance of this type of notification from an all hazards perspective	Noted	Existing text clearly indicates HAB event applicability.
Criterion E.1	FEMA-2008-0022-0110-010	Alabama Emergency Management Agency, J Frank Price	page II-28, line 36: State and Local plans would not have Federal, State, or Local Law Enforcement communication plan; just communication will be from a credible LE source	Noted	OROs need to have their own protocols, in addition to familiarity with external protocols.
Criterion E.1	FEMA-2008-0022-0121-048	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-29 Line: 36 Comments: This requires too much detail. This manual should not dictate that plans or procedures contain a copy of any form.	Noted	The plans/procedures should contain or describe the method of documentation.
Criterion E.1	FEMA-2008-0022-0110-011	Alabama Emergency Management Agency, J Frank Price	page II-29, lines 6-9: Same problem will planning all communications for a HAB event	Noted	OROs need to have their own protocols, in addition to familiarity with external protocols.
Criterion E.1	FEMA-2008-0022-0108-029	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-29 Line: 6-12 Comment: It should be the licensee's responsibility to develop and alternate notification plan to "work in all directions."	Rejected	As a result of the events of September 11, 2001, all Federal agencies, and particularly those that have a mission to protect public health and safety, were compelled to take an internal look at their programs to ensure that they are adequately prepared for catastrophic and unanticipated incidents, including hostile action threats. NRC and FEMA promulgated changes to NUREG-0654/FEMA-REP-1 to address planning and preparedness for these kinds of incidents. The OROs and the licensee must work together to develop the notification plan. Communications must work in both directions.
Criterion E.1	FEMA-2008-0022-0020-012	Ashtabula County EMA, George Rolland	Page Ref. II-29 Comment: Lines 7-9 Alternate facilities are discussed; it is unclear whose facility is intended. Comment by: Locals	Modified	The REP Program Manual has been clarified. The cited sentence has been amended to read, "OROs develop procedures for verifying the information and initiating notifications from alternate entities (e.g., the Joint Terrorism Task Force, Fusion Centers, 911, emergency management agencies, and LLEAs)." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0021-012	Geauga County DES, Dale Wedge	Page Ref. II-29 Comment: Lines 7-9 Alternate facilities are discussed; it is unclear whose facility is intended. Comment by: Locals	Modified	The REP Program Manual has been clarified. The cited sentence has been amended to read, "OROs develop procedures for verifying the information and initiating notifications from alternate entities (e.g., the Joint Terrorism Task Force, Fusion Centers, 911, emergency management agencies, and LLEAs)." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.
Criterion E.1	FEMA-2008-0022-0036-012	Lake County EMA, Larry Greene	Page Ref. II-29 Comment: Lines 7-9 Alternate facilities are discussed; it is unclear whose facility is intended. Comment by: Locals	Modified	The REP Program Manual has been clarified. The cited sentence has been amended to read, "OROs develop procedures for verifying the information and initiating notifications from alternate entities (e.g., the Joint Terrorism Task Force, Fusion Centers, 911, emergency management agencies, and LLEAs)." See the Explanation section of Evaluation Criterion E.1 in Part II.C - Planning Guidance.
Criterion E.1	FEMA-2008-0022-0106-052	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-29, Lines 14 - 16Comment: "If law enforcement responds to a HAB event that has the potential to impact a nuclear power plant, plans should include procedures to notify the site and the appropriate EMAs." Such events will not happen in a vaccum? The State Emergency Response Plan would deal with anything off-site and most assuredly, if there was a potential to impact the nuclear power station, Nebraska is sure that the NRC would probably beat the State in notifying the nuclear power station. REP plans deal specifically deal with an off-site response to an on-site nuclear power station situation. FEMA/NRC are apparently trying to expand regulation of other all-hazard plans with this requirement.Potential Impact: NRC/FEMA seem once again to be getting to detailed in planning requirements.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion E.1	FEMA-2008-0022-0042-005	Ned Wright	Page II-29, line 35: “Information included in the notification form from the licensee to the offsite 24-hour warning point is usually recorded on a notification form. The plans/procedures should contain a copy of this form. Remove “usually” and replace “should” with “will.” It is important that some form of written documentation be mandatory to verify verbal communications during an emergency.	Rejected	FEMA is satisfied with the existing wording. Some OROs may use a different format for the notification documentation.
Criterion E.1	FEMA-2008-0022-0108-030	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-29 Line: 35-36 Comment: Notification from the licensee should "always" be recorded on a notification form. Remove "usually."	Rejected	FEMA is satisfied with the existing wording. Some OROs may use a different format for the notification documentation.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.1	FEMA-2008-0022-0117-021	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, E.1, page3 II-29, lines 38-39 :Although this criterion is applicable to the following plans/procedures, FEMA intends for this guidance to apply only to OROsComments: For the OROs to effectively accomplish the guidance in this section, the Licensee will need to establish procedures for the receipt and verification of threats from outside the plant. It should be recognized that action is required of the Utility for the ORO to perform this criterion to the level the guidance indicates. Explanation/ Recommendation: Remove these lines and acknowledge the required actions by the utility/licensee	Modified	This statement has been reworded to quote the applicability language in NUREG-0654/FEMA-REP-1. The REP Program Manual is guidance for OROs. The NRC provides guidance for licensees.
Criterion E.2					
Criterion E.2	FEMA-2008-0022-0106-053	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-30, Lines 6 thru 36Comment: Most emergency management agency procedures for 24-hour alert, notification, and mobilizing emergency response personnel are used for all hazards. Does this mean that NRC/FEMA are now going to tell the the States exactly how they will respond to all incidents?	Modified	FEMA evaluates only REP criteria at REP exercises. Alert and notification procedures for REP incidents will include some REP-specific personnel who might not be notified for general all-hazards incidents.
Criterion E.2	FEMA-2008-0022-0110-012	Alabama Emergency Management Agency, J Frank Price	page II-30, line 19: “Describe who” is too detailed; what is wanted a physical description of the PCO?	Modified	The REP Program Manual has been amended to specify, "describe who, by title or position, has the responsibility..." See the bullet list under Evaluation Criterion E.2 in Part II.C - Planning Guidance.
Criterion E.2	FEMA-2008-0022-0108-031	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-30 Line: 22-23 Comment: A diagram "may" supplement a plan/procedure description. Define "may," is it related to "should."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. "May" denotes a possible course of action, neither requirement nor recommendation. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Management. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.2	FEMA-2008-0022-0087-009	South Carolina Emergency Management Division, Danny Loomis	Page 11-30/31 (E.3/E.4): The amount of information and the expedience of delivering it needs to be balanced for initial and follow-up notifications. If It Is needed faster, It can't be as much.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion E.2	FEMA-2008-0022-0108-032	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-31 Line: 12 Comment: Would a check box somehow showing the event is a hostile action be appropriate?	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion E.5					
Criterion E.5	FEMA-2008-0022-0116-039	Nuclear Energy Institute, Alex Marion	Part II.C, E.5, p.32, (lines 02-05): The EBS was replaced by the Emergency Alert System (EAS). EBS as described here does not exist. Part II.C, E.5, p.32, (lines 02-05): Revise the reference to EBS to EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0097-026	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page32, Lines 02-05): The EBS was replaced by the EmergencyAlert System (EAS). EBS as describedhere does not exist.COMMENT: Revise the reference to EBS to EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0128-009	San Luis Obispo County Office of Emergency Services , Ron Alsop	page 32, lines 02-05: Reference to Emergency Broadcast System (EBS).COMMENTs: Editorial issue, EBS was changed to Emergency Alert System (EAS)Explanation/Recomendation: Revise the reference to EBS to EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0110-013	Alabama Emergency Management Agency, J Frank Price	page II-32, line 4: EBS needs to be replaced with EAS	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.5	FEMA-2008-0022-0090-001	York County Office of Emergency Management, James Welty	Page II – 32 lines 4 & 5 should be Emergency Alert System (EAS) not Emergency Broadcast System (EBS)	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0087-010	South Carolina Emergency Management Division, Danny Loomis	Page 11·32 (E.S, lines 1 & 2): EBS no longer sxlsts. Today it is the EAS-Emergency Alert System	Noted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0101-005	Florida Division of Emergency Management, Michael Younger	Both FEMA and the NRC should take this opportunity toprovide updates to clearly outdated criteria (such the reference to the EBS in criterion E.5 that has since been replaced by EAS).	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0105-021	Tennessee Emergency Management Agency, Gary Lima	EBS is no longer used in REP – the term is EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0095-012	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Both FEMA and the NRC should take this opportunity to provide updates to clearly outdated criteria. For example the reference to the EBS in criterion E.5 that has since been replaced by EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0098-012	Kansas Department of Health and Environment, Thomas Conley	Both FEMA and the NRC should take this opportunity to provide updates to clearly outdated criteria. For example the reference to the EBS in criterion E.5 that has since been replaced by EAS.	Accepted	The REP Program Manual citation has been amended to reference "EAS" rather than "EBS" and a footnote to the NUREG-0654/FEMA-REP-1 addenda added. However, note that the EBS still exists in some locations.
Criterion E.5	FEMA-2008-0022-0042-006	Ned Wright	Page II-32, Line 14: “The stations should be able to broadcast official information 24 hours a day, 7 days a week.” Additional comment needs to be included. Since most broadcast stations have the capability to broadcast 24/7, many go to a syndicated pre-recorded program format in the late evening-early morning time period when there is no-one is physically at the station. Need to address what steps are in place to activate the EAS system in the event of an emergency during the off hours if the broadcast station is not staffed 24/7.	Accepted	The REP Program Manual has been amended as suggested. The statement "FCC regulations require EAS stations to maintain 24-hour capability to interrupt broadcasts regardless of whether they are broadcasting live or relaying programming" has been added to the explanation of E.5. See the Explanation section of Evaluation Criterion E.5 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.5	FEMA-2008-0022-0108-033	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-32 Line: 2 Comment: What about EAS facilities that have no personnel on site at night?	Modified	The REP Program Manual has been amended as suggested. The following sentence has been added about 24/7 broadcast capability: "Twenty-four-hour capability to interupt broadcasts needs to be maintained regardless whether the station is broadcasting live or relaying programming." See the Explanation section of Evaluation Criterion E.5 in Part II.C - Planning Guidance.
Criterion E.6					
Criterion E.6	FEMA-2008-0022-0110-014	Alabama Emergency Management Agency, J Frank Price	page II-33, lines 24-29: Administrative procedures and physical means should be in the same procedure; having 2 procedures may cause confusion	Noted	OROs decide how to organize their plans. The guidance is intended to emphasize that procedures should cover both physical and administrative aspects of alert and notification.
Criterion E.6	FEMA-2008-0022-0121-049	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-34 Line: 4 thru 8 Comments: The bullets should be reworded to be complete sentences or direct an action to be taken. They are just open-ended statements.	Noted	The cited text mirrors the original language from NUREG-0654/FEMA-REP-1 for continuity. The bullets follow a format used throughout the REP Program Manual and are complete sentences when taken together with the text that precedes the bullets.
Criterion E.6	FEMA-2008-0022-0095-027	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-33, sentence 23, delete “Hazardous radiological” from sentence. That may not apply in a HABD and other events	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0098-026	Kansas Department of Health and Environment, Thomas Conley	Page II-33, sentence 23, delete “Hazardous radiological” from sentence. That may not apply in a HABD and other events.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0101-032	Florida Division of Emergency Management, Michael Younger	Page II-33, lines 22-23This sentence should be re-written to say that there is “an emergency situation” to better reflect the events that may require notification to the public.	Modified	The REP Program Manual has been amended to replace the term "emergency situation" with "incident." See the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.6	FEMA-2008-0022-0113-014	North Carolina Division of Emergency Management, Stephen Payne	Page II-33, Line 23-24 RECOMMENDATION/COMMENT: REWORD / REWRITEBASIS:As written this is only for events starting within the NPP. How does this relate to hostile action events that may not have a radiological release but there is the need to inform the public of a danger at the NPP?	Noted	The existing REP Program Manual language is adequate. Strategies will vary with different scenarios.
Criterion E.6	FEMA-2008-0022-0042-007	Ned Wright	Page II-33, footnote #52: “This criterion requires that the state provide a design report that describes the alert and notification system. FEMA reviews this report for acceptability prior to activating the system and conducting the public telephone survey required by 44 CFR 350.9(a).” Is this (44 CFR 350.9(a)) the correct reference for a siren design report? A review of 44 CFR 350.9 appears to address exercises.“(a) Before a Regional Director can forward a State plan to the Associate Director for approval, the State, together with all appropriate local governments, must conduct a joint exercise of that State plan, involving full participation of appropriate local government entities, the State and the appropriate licensee of the NRC.”	Modified	The cited reference has been deleted. See the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0113-015	North Carolina Division of Emergency Management, Stephen Payne	Page II-33, Footnote #52 RECOMMENDATION/COMMENT: REWRITE AS ORIGINAL:52 This criterion requires that the Licensee provide a design report that describes the alert and notification system. FEMA reviews this report for acceptability prior to activating the system and conducting the public telephone survey required by 44 CFR § 350.9(a). State, local, and tribal government officials are expected to incorporate sections of the offsite radiological emergency response plans (or, at a minimum, an accurate cross-reference to the plans) into the alert and notification system design report. This is in addition to including a description of the system in their plans.BASIS:The physical design of the alert and notification is the responsibility of the licensee to construct and maintain. State, local, and tribal governments do not have the expertise, manpower or funds to accomplish this task.	Modified	The cited language has been modified as follows: "Regardless of the physical means comprising the system, the licensee provides a design report to FEMA describing the ANS." See the Physical Means of Alert and Notification subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0042-017	Ned Wright	Also, is it the State’s responsibility to provide the siren design report or the licensee? Can this be clarified?	Noted	Licensee provides report to state, who provides to FEMA.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.6	FEMA-2008-0022-0087-011	South Carolina Emergency Management Division, Danny Loomis	Page 11-34 (E.G, lines 8-9); Siren test data is provided on a quarterly basis to the NRC as plant performance data. This information should be sufficient for FEMA use in determining siren functionality, Requiring two separate reporting schemes is redundant and wasteful.	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA and NRC testing requirements produce two different data sets.
Criterion E.6	FEMA-2008-0022-0111-015	Illinois Emergency Management Agency, Andrew Velasquez	page II-33, 4th sub-paragraph. The criterion references the 90% operability of the Siren System. Current NRC Performance Indictors require that performance be at least 94% to stay in the "green band". The 90% operability reference is inconsistent with current NRC performance measures.	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA and NRC testing requirements produce two different data sets.
Criterion E.6	FEMA-2008-0022-0108-034	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-34 Line: 11-14 Comment: If siren information can be submitted annually with the ALC, do the FEMA regions still require quarterly reports that are due within 30 days of the quarter?	Noted	The quarterly reporting requirement no longer applies.
Criterion E.6	FEMA-2008-0022-0121-053	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-34 Line: 35-38 Comments: "open water" areas - Key issue is that exception areas must be beyond 5 miles. Please identify the regulatory citation for this. Therefore on lake Erie within 15 minutes the State of Ohio and counties must have something in place. This cannot be done easily and without major costs.	Noted	The basis is NUREG-0654/FEMA-REP-1, Appendix 3. This is not a new requirement. Alternative approaches are permitted (see REP Program Manual Part I, Section C.3)
Criterion E.6	FEMA-2008-0022-0113-016	North Carolina Division of Emergency Management, Stephen Payne	Page II-34, Line 24 RECOMMENDATION/COMMENT: REWRITE AS ORIGINAL – REMOVE WORD “ABOUT”The capability for: (1) providing an alert signal and beginning an informational or instructional message to the population in the 10-mile Emergency Planning Zone (EPZ) within 15 minutes of the decision to alert the public and (2) providing instructions and protective action recommendations (PARs), if appropriate. BASIS:This statement is in conflict with the guidance in lines 35 & 36. It makes the 15-minute rule even more ambiguous. Current guidance is that the 15-minute clock starts AFTER a PAD decision is made by the ORO’s.	Accepted	The word "about" has been removed for consistency with Supplement 4. The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.6	FEMA-2008-0022-0097-029	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, E.6, Page II-35 Lines 7-16: [NOTE: Same paragraph exists in with proposed NRC Interim Staff Guidance (NSIR/DPR-ISG-01, Rev. 0) Should insert same comments from ANS Task Force.] The ISG is more specific on backup ANS criterion than this explanation in presented in the REP Manual.	Modified	The language on backup alert and notification in the REP Program Manual has been reviewed for consistency with NRC Interim Staff Guidance (NSIR/DPR-ISG-01, Rev. 0). Most of the language not included in the REP Program Manual applies only to licensees, but some additional language has been incorporated into the REP Program Manual. See the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0120-005	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-35; line 7-16 Does this take into account actions during a HAB event? This might not be the ideal route dependent on the scenario.	Noted	Yes, the guidelines for backup alert and notification are flexible to account for topography, population density, existing ORO resources, timing, and concurrent circumstances. Strategies will vary with different scenarios.
Criterion E.6	FEMA-2008-0022-0020-053	Ashtabula County EMA, George Rolland	Does the 45-minute requirement still apply to 'back-up route alerting' if a siren is 'known to be out of service'? Comment by: Locals	Noted	Backup alerting is expected in a timely manner, with a recommende goal of 45 minutes. If a siren is known to be out of service, OROs in effect have advance notice that the siren will fail and are in a position to have backup arrangements ready in advance, allowing them to complete alerting that much more quickly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Criterion E.6	FEMA-2008-0022-0126-020	Pilgrim Watch, Mary Lampert	FEMA: At section V, it says that, “FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plume exposure EPZ within 45 minutes of failure of the primary alert and notification system.” Comment; The language must read “ FEMA and the NRC require that OROs and operators establish backup means that will reach those in the plume exposure EPZ within an approximate 45 minutes of failure of the primary alert and notification system.”	Rejected	The existing language is adequate. The use of "recommend" has been verified and is consistent with the guideline of "within a reasonable time."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.6	FEMA-2008-0022-0035-001a	Blue Ridge Research and Consulting, LLC, Bruce Ikelheimer	While there are certainly areas where there needs to be direct input from the federal regulator in regards to the certification of a public alert system, this does not have to be the case at least as far as the expected noise coverage from a given system design is concerned. The regulatory process has what can only be described as 'submit and hope' mentality. Power plants buy siren systems from vendors who generally provide an estimate of the expected siren coverage from their system. The sound propagation models used by these manufactures are generally proprietary. This creates an environment where it is unclear from the start how well one system performs in comparison with other manufactures due to the inherent differences in how the siren coverage is calculated. In addition, the models used to design the system are generally different from the model used by the federal regulators, leaving in some doubt whether or not the system provides adequate coverage. The field of outdoor acoustic propagation is mature, and there are a large number of cases where federal regulation of outdoor sound levels has been standardized.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The siren system is the responsibility of the utility and is regulated by the NRC.
Criterion E.6	FEMA-2008-0022-0035-001b	Blue Ridge Research and Consulting, LLC, Bruce Ikelheimer	(continued) For example, the noise footprint around airports is computed by the Integrated Noise Model (INM), an industry standard model that provides accurate and repeatable estimates of the noise footprint generated by airport operations. For military airports the noise model NoiseMap is used to determine the environmental impact. Similarly, highway noise is computed using the Traffic Noise Model (TNM) where the results from the model carry legal weight when it comes to erecting noise barriers. There are a large number of other situations ranging from the noise from firing ranges to the noise from large construction sites where there are standardized models that leave the determination of sound levels transparent and repeatable. For each of these models the results are irrefutable and carry legal weight for policy making. With the potential for new plants being built, and with the increasing requirements of current systems it behooves the industry in general to adopt a similar methodology for determining the correct propagation distance expected from a siren system.		

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Criterion E.6	FEMA-2008-0022-0035-001c	Blue Ridge Research and Consulting, LLC, Bruce Ikelheimer	(continued)Such a system should consider the intervening terrain, ground cover and prevailing weather. It should tie in with local census data to determine population coverage. In addition, it should be peer reviewed to ensure that it uses good science in the calculations. It need not be overly complex, but if the siren manufacturers use the same model that is used by the federal regulators it will reduce the cost and time associated with certifying a new system or for recertification of a modified system. This will create an environment of transparent accountability that will not be open for debate when it comes to putting a siren system into service.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits					
clarification of time limits	FEMA-2008-0022-0100-012a	**Pennsylvania Emergency Management Agency, Henry Tamanini**	NUREG Criterion E.6 on page II-33 addresses the administrative and physical means, and the time required for notifying and providing prompt instruction to the public within the plume exposure pathway emergency planning zone. Appendix 3 of NUREG-0654/FEMA-REP-1 along with 44 CFR § 350.5(a), and REP-10 discuss the alert and notification system design objectives. Page II-34, line 22 of the Draft REP Manual indicates that the minimum acceptable design objectives for coverage by an alert and notification system include: "The capability for (1) providing an alert signal and beginning an informational or instructional messageto the population in the 10-mile Emergency Planning Zone within about 15minutes of the decision to alert the public…" Page II-34 lines 30-32 state "A backup means of public alert and notification capable of covering essentially 100 percent of the population in the plume exposure EPZ in the event the primary method is unavailable. The backup means of alert and notification shall be conducted within a reasonable time." Additionally, on page II-35, lines 25 and 26 state that "the suggested time for completion of backup route alerting is 45 minutes."	Noted	**The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.**
clarification of time limits	FEMA-2008-0022-0100-012b	Pennsylvania Emergency Management Agency, Henry Tamanini	(Continued)The lack of consistency in the regulations and examples result in issues during Radiological Emergency Preparedness exercises. We understand that different FEMA Regions have different views on when to begin the timing of the back-up route alerting demonstrations. One FEMA Region starts the clock at the first indication of a siren failure whereas an adjacent FEMA Region startstheir clock when the route alerting team begins driving the route.Given these inconsistencies and observations, we respectfully request that the wording of these standards be changed to read "initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 15 minutes, if possible" and the standard for exception areas and backup route alerting should read "initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 45 minutes, if possible." We believe that this change will not detract from public health and safety, but will provide a reasonable standard and goal that will also make allowances for traffic, traffic lights, traffic impediments, or inclement weather.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0116-040	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion E.6 – The explanation places considerable emphasis on the 15 minute design objective, including calling for inclusion in plans of an analysis of the time required to implement alert and notification procedures. This seems to be a disconnect with the exercise evaluation criteria in sub-element 5.a that calls for demonstration of the capability in a timely manner “with a sense of urgency and without undue delay”. The expectation for OROs is unclear. Do they adhere to the 15 minute requirement regardless of the evaluation criteria?	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0106-054	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-33, Line 14, thru page II-34, Line 18Comment: This is very confusing. It appears NRC/FEMA want the States and locals to plan for alert and notification of the public within a 15 minute time period. Yet, when one reviews the exercise criteria on page III-64 it says that Alert and Notification needs to be accomplished in a timely manner. Which is it?	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0080-009a	Douglas Fleck	NUREG Criterion E.6 on pages II-33 thru II-35 contains a detailed discussion of time limits for initial notification, back-up notification, and exception areas. For initial alert and notification the wording reads “within about 15 minutes” on line 22 of page II-34. On line 34 of the same page the wording has been changed to read “ within 15 minutes” and over on page II-35 you refer to the standard as “the 15 minute time limit” in lines 35 and 36. In the interest of clarity and commonality there can only be one standard. Likewise, on page II-34, lines 31 and 32 you state that “backup means of alert and notification shall be conducted within a reasonable time” yet on page II-35, line 26 you state “the suggested time for completion of backup route alerting is 45 minutes.” You also state on page II-34, line 29 that exception area notification “must occur within 45 minutes.” Your proposed NUREG-0654/FEMA-REP-1, Supplement 4, dated May 18, 2009, states this requirement in an even different way!	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0080-009b	Douglas Fleck	(Continued) These notification times are one of the most contentious and contested areas between OROs and federal evaluators during a biennial evaluation. Prior to 2002 the 15 minute time limit for initial alert was non-negotiable. 14:59 was acceptable, but 15:01 was a deficiency. In 2009 a more rational standard of “in a timely manner (will not be subject to specific time requirements)” was adopted. This was good. Unfortunately nobody heeded calls to also apply the “in a timely manner” standard to backup and exception area alert and notification requirements. Currently we have the ludicrous situation where there is no time limit on the initial alert and notification that will reach nearly 100% of the population, but for the few exception areas and the rare siren failure we are locked into an inflexible 45 minute standard. In other words, 44:59 is acceptable, but 45:01 is a failure.		

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clarification of time limits	FEMA-2008-0022-0080-009c	Douglas Fleck	(Continued)This coupled with the fact that FEMA Regions have different views on when to begin even timing these demonstrations (FEMA Region III starts the clock at the first indication of a siren failure whereas Region V starts once the people conducting the route alerting actually begin driving the route) it is easy to see where much of the inconsistency and resentment come from. Strongly recommend that the wording of these standards be changed to read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 15 minutes, if possible” and the standard for exception areas and backup route alerting should read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 45 minutes, if possible.” This will not detract from public health and safety, but will provide a reasonable standard and goal that will also make allowances for rare instances of equipment failure or inclement weather. A backup route that can be done in 45 minutes on a sunny day will most likely be impossible during a thunderstorm or with a foot of snow on the ground. Abnormal traffic issues will also skew the times. What is important is that the attempt is being made with no unnecessary delays.		

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clarification of time limits	FEMA-2008-0022-0080a-009a	Pennsylvania Emergency Management Agency, Douglas Fleck	pages II-33 thru II-35 contains a detailed discussion of time limits for initial notification, back-up notification, and exception areas. For initial alert and notification the wording reads “within about 15 minutes” on line 22 of page II-34. On line 34 of the same page the wording has been changed to read “ within 15 minutes” and over on page II-35 you refer to the standard as “the 15 minute time limit” in lines 35 and 36. In the interest of clarity and commonality there can only be one standard. Likewise, on page II-34, lines 31 and 32 you state that “backup means of alert and notification shall be conducted within a reasonable time” yet on page II-35, line 26 you state “the suggested time for completion of backup route alerting is 45 minutes.” You also state on page II-34, line 29 that exception area notification “must occur within 45 minutes.” Your proposed NUREG-0654/FEMA-REP-1, Supplement 4, dated May 18, 2009, states this requirement in an even different way! These notification times are one of the most contentious and contested areas between OROs and federal evaluators during a biennial evaluation. Prior to 2002 the 15 minute time limit for initial alert was non-negotiable. 14:59 was acceptable, but 15:01 was a deficiency. In 2009 a more rational standard of “in a timely manner (will not be subject to specific time requirements)” was adopted. This was good. Unfortunately nobody heeded calls to also apply the “in a timely manner” standard to backup and exception area alert and notification requirements.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0080a-009b	Pennsylvania Emergency Management Agency, Douglas Fleck	(continued)Currently we have the ludicrous situation where there is no time limit on the initial alert and notification that will reach nearly 100% of the population, but for the few exception areas and the rare siren failure we are locked into an inflexible 45 minute standard. In other words, 44:59 is acceptable, but 45:01 is a failure. This coupled with the fact that FEMA Regions have different views on when to begin even timing these demonstrations (FEMA Region III starts the clock at the first indication of a siren failure whereas Region V starts once the people conducting the route alerting actually begin driving the route) it is easy to see where much of the inconsistency and resentment come from. Strongly recommend that the wording of these standards be changed to read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 15 minutes, if possible” and the standard for exception areas and backup route alerting should read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 45 minutes, if possible.” This will not detract from public health and safety, but will provide a reasonable standard and goal that will also make allowances for rare instances of equipment failure or inclement weather. A backup route that can be done in 45 minutes on a sunny day will most likely be impossible during a thunderstorm or with a foot of snow on the ground. Abnormal traffic issues will also skew the times. What is important is that the attempt is being made with no unnecessary delays.		

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clarification of time limits	FEMA-2008-0022-0098-025	Kansas Department of Health and Environment, Thomas Conley	Page II-33 to II-35 (E.6) The explanation for this criterion places a significant emphasis on the 15-minute design objective for notification to the public. While the 15-minute design objective remains a valid design basis from a licensing standpoint, current FEMA planning guidance on the implementation of notifications to the public has been in a timely manner, with a sense of urgency and without undue delay as described in evaluation criterion 5.a.1 found on Page III-61. The emphasis throughout the criterion implies a return to a 15-minute notification requirement.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0129-009	Wisconsin Emergency Management, Teri Engelhart	Page: II-34, Line: 16, Comment: Discussion of the 15 Minute Notification Time Limit - Please note contradictory language here. Line 22 states that instructions to the 10-mile population should begin "within about 15 minutes" and line 34 states that instruction should be given to the public in remote areas "within 15 minutes." Consistency should be maintained throughout the document regarding ORO time constraints, or provide more explanation regarding under what circumstances time constraints may be relaxed. As written, the language allows for a overly subjective evaluation.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

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clarification of time limits	FEMA-2008-0022-0110-015	Alabama Emergency Management Agency, J Frank Price	page II-34, lines 16-32; 15 minutes, about 15 minutes, within 45 minutes of the decision, and reasonable time are all used in this area. Should use “acted on when received” for notifying the public	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0097-027	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, E.5 COMMENT: The explanation places considerable emphasis on the 15 minute design objective, including calling for inclusion in plans of an analysis of the time required to implement alert andnotification procedures. This seems to be a disconnect with the exercise evaluation criteria insub-element 5.a that calls for demonstration of the capability in a timely manner “with a sense of urgency and without undue delay”. The expectation for OROs is unclear. Do they adhere to the15 minute requirement regardless of the evaluation criteria? Also, criterion E.6, discusses backup means of public alert and notification in the event the primary method is unavailable. The explanation says that the backup method would be implemented in multiple stages based on distance from the plant and can be completed within 45 minutes. The explanation implies that both FEMA and the NRC are looking for a backup method that is a complete alternative to the siren system. Need to state whether the evaluation criteria should be 15 minutes or, “with a sense of urgency without undue delay”.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0112-006	Harford County Division of Emergency Operations, Linda Ploener	15-Minute Notification Time Limit: Why is there no time requirement for route alerting as a “primary notification”, but there is for back up????? What does “about 15 minutes” mean? If needed, does it give the locals additional time to begin the informational or instructional message to the population in the 10-mile EPZ, or is it a “15 minutes or less” scenario? What does “reasonable time” mean in conjunction with back-up means of alert and notification? This is discussed on Page II-24 and II-35. On Page II-35, the paragraph beginning on line 23 discusses description of other route alerting systems used. Currently, route alerting is demonstrated for hearing impaired populations as well as in the event of a siren failure. I’m concerned that the guidance will require a 45 minute back-up notification timeframe for complete failure of the siren warning system. Local jurisdictions do not rely solely on back-up route alerting as a means of notification. Harford County, in particular, utilizes a web-based notification system (Blackboard Connect-CTY) to provide residents, businesses, and employees with emergency instructions and information pertaining to an event(s) which impacts the County. It is a much more reliable method for back-up notification than “route alerting”. Remove the 45-minute requirement.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0090-004	York County Office of Emergency Management, James Welty	Page II-34, Lines 21-24: What does “within about 15 minutes mean” (Line 24 above)? Currently the requirement is “In a timely manner.” I feel this requirement should remain “In a timely manner”.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0078-032	Minnesota Homeland Security and Emergency Management , kevin Leuer	Pages II-34 Lines 21-24 What does “about 15 minutes” mean – this needs to be more clearly defined. When does the clock start and who starts the clock starts to determine when the “about 15 minutes” are up.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0120-004	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-34; 21-24 and Page II-35; 34-36 “The capability for: (1) providing an alert signal and beginning an informational or instructionalmessage to the population in the 10-mile Emergency Planning Zone (EPZ) within about 15 minutes of the decision to alert the public and (2) providing instructions and protective actionrecommendations (PARs), if appropriate” and “The alert and notification system activation procedures and time required to implement these procedures. This discussion should also specify that the system is capable of meeting the 15-minute “time limit.”This is contradictor,y is there a time requirement or not? FEMA might need to take out wording “about 15 minutes” to clarify.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0095-026	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-33 to II-35 (E.6) The explanation for this criterion places a significant emphasis on the 15-minute design objective for notification to the public. While the 15-minute design objective remains a valid design basis from a licensing standpoint, current FEMA planning guidance on the implementation of notifications to the public has been in a timely manner, with a sense of urgency and without undue delay as described in evaluation criterion 5.a.1 found on Page III-61. The emphasis throughout the criterion implies a return to a 15-minute notification requirement.	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0101-031	Florida Division of Emergency Management, Michael Younger	Page II-33 to II-35 The explanation for this criterion places a significant emphasis on the 15 minute design objective for notification to the public. While the 15 minute design objective remains a valid design basis from a licensing standpoint, current FEMA planning guidance on the implementation of notifications to the public has been in a timely manner, with a sense of urgency and without undue delay as described in evaluation criterion 5.a.1 found on Page III-61. The emphasis throughout the criterion implies a return to a 15 minute notification requirement. It is better to take 20 minutes and make an informed decision than to take 14 minutes and make a rushed decision to meet a time limit when many factors must be considered and coordinated with multiple jurisdictions.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0116-042	Nuclear Energy Institute, Alex Marion	Need to state whether the evaluation criteria should be 15 minutes or, “with a sense of urgency without undue delay”.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0102-013	Entergy Nuclear Operations, Inc., Michael Slobodien	Section V b. Summary of Changes, sub Paragraph d Page 14, Paragraph 1The phrase “within a reasonable time” is a practical concept. However, throughout the NUREG-0654 Supplement 4 document and draft REP Program Manual, the time requirements for backup public alert and notification are described in a variety of ways. The comment is for NRC and FEMA to come to consensus on related but inconsistent wording.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0086-010	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	For initial alert and notification, Page II-34, line 22: states “within about 15 minutes”; Page II-34, line 34: states “within 15 minutes”; Page II-35, line 8, refers to the “FEMA 15-minute notification time limit” Comments: The language referring to initial alert and notification needs to be standardized. The wording varies within the same criterion and is also different from Exercise Evaluation criterion 5.a.1 which requires OROS to "demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay”. The suggested wording could be: "initial alert and notification should be conducted in a timely manner with no undue delay and within a goal of 15 minutes". The language used in the REP Program Manual should also be consistent with the Exercise Evaluation criterion 5.a.1.	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0102-026	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-34, line 22 states: “within about 15 minutes”; Page II-34, line 34 states: “within 15 minutes”; Page II-35, line 8, refers to the “FEMA 15-minute notification time limit”.Comments: The language referring to initial alert and notification needs to be standardized. The wording varies within the same criterion and is also different from Exercise Evaluation criterion 5.a.1 which requires OROS to “demonstrate actions to disseminate the appropriate information/instructions with a sense of urgency and without undue delay”. A suggested wording could be: “initial alert and notification should be conducted in a timely manner with no undue delay and within a goal of 15 minutes”. The language used in the REP Program Manual should also be consistent with the Exercise Evaluation criterion 5.a.1.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0105-017	Tennessee Emergency Management Agency, Gary Lima	There is no such thing as about 15 minutes for measuring an action that will determine a Deficiency or an ARCA. Where timely manner or any like term is used, then room is made for variables affecting a specific state or utility. If an action has to be accomplished in 15 minutes, then there is no equivocation – remove 'about' from any established time stamp.	Accepted	The word "about" has been removed for consistency with Supplement 4. The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0128-010	San Luis Obispo County Office of Emergency Services , Ron Alsop	page 34, lines22, 34, 37 – 38: Administrative and physical means to notify and provide prompt instruction to the public.COMMENTs: The 15-Minute Notification time limit is contradictory within this explanation. On line 22 the text reads "within about 15 minutes". On line 34 the text reads "within 15 minutes to remote and low population areas". On line 37 and 38 the text states "in extremely rural, low population areas that are beyond 5 miles from the facility, up to 45 minutes may be allowed…". In addition, this criterion seems to be inconsistent with the exercise evaluation criteria in sub-element 5.a that calls for demonstration of the capability in a timely manner "with a sense of urgency and without undue delay". The expectation is unclear.Explanation/Recomendation:Delete all references to "within 15 minutes" and remain consistent with terminology utilized in exercise evaluation criteria in sub-element 5.a. In addition define difference between remote, low population areas and extremely rural, low population areas.	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0121-050	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-34 Line: 22-23 Comments: Are we going back to the 15 minute clock?	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0129-053	Wisconsin Emergency Management, Teri Engelhart	Page: 13 Line: 5th paragraph Comment: Again, there is inconsistent use of the "within 15 minutes." Please have all guidance documents clearly state the timeframe expectations.	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0106-033	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact: When do the clocks commence for timing the Alert and Notification System (ANS)? Is there a change?	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0111-009a	Illinois Emergency Management Agency, Andrew Velasquez	Illinois recommends that Section V - Backup Means For Alert and Notification Systems be revised to clarify the requirements. This section has the potential to create a regulatory nightmare in that there is no clear cut guidance on what would constitute an adequate backup notification system. For instance, FEMA has wording that differs from the NRC wording. In particular the statement from Page 13, "Although circumstances may not allow this for all facilities, FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plum exposure EPZ within 45 minutes of failure of the primary alert and notification system."; this adds confusion when on Page 14 the statement is:.. 'The backup means of alert and notification shall be concluded within a reasonable time.To eliminate confusion, IEMA recommends that the NRC and FEMA guidance be revised to include the following paragraph from Page 5-10 of the draft, "Technical Basis for the Emergency Preparedness Rulemaking", dated May 13, 2009; "The NRC would also revise its guidance to clarify that backup warning measures do not need to be implemented with a 15- minute timeframe	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0111-009b	Illinois Emergency Management Agency, Andrew Velasquez	(continued)(to ensure direct coverage of essentially 100 percent of the population within 5-miles of the site) or a 45-minute timeframe (to ensure 100 percent coverage of the population who rnay not have received the initial notification, such as those in rural or recreational areas), because this would impose the same design objectives on the backup system as those for the primary and compensatory alerting methods described in Appendix 3 to NUREG-0654 (Long Island Lighting Company (Shoreham Nuclear Power Station, Unit I), ASLB-88-2, 27 NRC 85 (1988). The staff recognizes some backup methods may not be capable of meeting the timeframes that are part of the primary ANS design objectives. The intent is not to have a duplicate primary ANS but to have a means of backup notification in place so that the populace can be alerted in sufficient time to allow offsite officials to consider a range of protective actions for the public to take in the event of a sever accident with potential offsite radiological consequences. A graded approach in which the populations most at risk are alerted and notified first, followed by alerting and notification of people in less affected areas, is acceptable for the backup means.		
clarification of time limits	FEMA-2008-0022-0111-009c	Illinois Emergency Management Agency, Andrew Velasquez	(continued) There would be no regulatory requirement for siren backup power. Although siren backup power would address one of the more common failure modes for fixed siren-based systems, other failure modes might still exist. Thus, it is important that the backup means be independent of the primary system so that it is not subject to the same type of failure mechanism.IEMA also notes that the term "sufficient time" used in the NRC draft will lead to many disagreements in interpretation as it is a subjective metric. In the interest of risk-informed regulation this time could be derived from the preliminary results of the State of the Art Reactor Consequence Analysis (SOARCA) study. Therefore, IEMA recommends that "sufficient time: be replaced with "3hours" as no credible accident sequences would produce a release in less than 3-hours.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0110-016	Alabama Emergency Management Agency, J Frank Price	page II-35, line 16: Requiring 45 minute's notification to the EPZ will require numerous resources to meet. This should be immediate action allowing OROs to use resources to notify those in the projected plume first, and notify the next areas which would allow for fewer resources	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0102-027	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II, line 31 states: "backup means of alert and notification shall be conducted within a reasonable time"; Page II-35, line 26 states: "the suggested time for completion of backup route alerting is 45 minutes"; Page II-34, line 29 states: that "exception area notification must occur within 45 minutes".Comments: The language referring to backup alert and notification needs to be standardized. The wording varies within the same criterion. Improved wording is suggested similar to the previous comment. The recommended change for backup alerting or exception areas could be: "alert and notification should be conducted in a timely manner with no undue delay and within a goal of 45 minutes".	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
clarification of time limits	FEMA-2008-0022-0108-035	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-35 Line: 35-36 Comment: Alert and notification systems must be capable of meeting the 15-minute time limit. What is the purpose of having to state this in plan/procedures if anything over 15-minutes will be considered inadequate and probably a deficiency?	Noted	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of time limits	FEMA-2008-0022-0116-016	Nuclear Energy Institute, Alex Marion	"OROs and utility operators attempt to establish backup means that will reach those in the plume exposure EPZ within 45 minutes of failure of the primary alert and notification system.” NEI requests that this last statement regarding a 45 minute requirement for the backup means be deleted from both the ISG and Supplement 4 discussions. This last statement contradicts statement “d)” above that states that, “The backup means of alert and notification shall be conducted within a reasonable time.” NEI endorses the expectation that the backup means be conducted within a reasonable time.	Modified	The entire sentence reads, "FEMA and the NRC RECOMMEND that OROs and licensees attempt to establish backup means that will reach those in the plume exposure EPZ within 45 minutes of receiving notice of failure of the primary alert and notification system." The cited text is not a requiremement, it is a guideline. The REP Program Manual text regarding time limits for backup alert and notification has been modified for clarity. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
newer technologies					
newer technologies	FEMA-2008-0022-0127-008	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	The reemphasis of the fifteen minute time limit for completing the notification process seems incongruous particularly if electronic and web-based means of instant messaging were to be incorporated into and given appropriate weight in a prompt notification system evaluation.	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
newer technologies	FEMA-2008-0022-0102-012	Entergy Nuclear Operations, Inc., Michael Slobodien	Section V a. Background Page 12, Paragraph.4 (Middle of Page) It is not clear whether available automatic dial-up (“reverse 9-1-1”) systems are included as an acceptable technical option. These systems are widely available and should be listed as acceptable options.Rationale: “Reverse 9-1-1” systems are technically viable means of back-up alert and notification, and have been endorsed by FEMA in approved ANS design reports.	Modified	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
newer technologies	FEMA-2008-0022-0102-025	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-35, Line 11: It is not clear whether available automatic dial-up ("reverse 911") systems are included as an acceptable technical option. These systems are widely available and should be listed as acceptable options. Rationale: "Reverse 911" systems are in current widespread use by licensees and OROs and have been shown to be a viable means of back-up alert and notification.	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
newer technologies	FEMA-2008-0022-0116-044	Nuclear Energy Institute, Alex Marion	If reverse 911 type of systems are to be considered acceptable backup alert and notification systems, will FEMA develop acceptance criteria for these types of systems?	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
newer technologies	FEMA-2008-0022-0126-016	Pilgrim Watch, Mary Lampert	From the text, it appears that sirens are the principle means of initial notification. However sirens are outdoor warning systems; the public at large neither works nor sleeps outside. Citizens note that sirens often cannot be heard inside many residences or workplaces above normal ambient sound. NUREG-0654/FEMA-REP-1, Appendix 3, Section C.3, (c) provides standards for siren systems " Where special individual cases require a higher alerting signal, it should be provided by other means than a generally distributed acoustic signal." This does not say that it refers simply to those who are disabled –deaf. If individuals inside homes, businesses, buildings, vehicles require a higher alerting signal because they cannot hear the sirens inside, it should be provided by other means than a "generally distributed acoustic signal." Those means are available – rapid telephone dialing systems and electronic message boards.Rapid dialing systems have the capability to notify workers and every household and business within the EPZ in less than 15 minutes by telephone, fax, email, text messaging. They should be required and tested during exercises. These telephone systems, today's version of the Town Crier, are on the market today; they can accomplish this task and are multi-functional. Reader boards along our roadways will provide notification to motorists that there is an accident; the protective action recommended; and alternative routes, if required. They, too, are multi-functional and belong in test scenarios. In addition, low frequency dedicated radio capability is recommended along our major roadways. Last, it is important to test whether citizens with Satellite dishes can receive EAS TV alerts.	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
newer technologies	FEMA-2008-0022-0126-022	Pilgrim Watch, Mary Lampert	Reliance on "mobile route alerting" or "local route notifications" does not constitutean equivalent nor adequate compensatory action for a reliable emergencynotification system in the event a fast breaking accident, act of terrorism or adverseweather that is coupled with widespread or localized electrical grid failure.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
newer technologies	FEMA-2008-0022-0126-024	Pilgrim Watch, Mary Lampert	Route Alerting is another standard back-up system. It calls for local emergency personnel to drive up and down streets where sirens fail to warn residents over their PA system. Route notification may take considerably longer than 15 minutes; it cannot be assumed only one or so closely located sirens fail. Route notification is a waste of now scarce human resources (budget cuts to local communities has resulted in reducing emergency management resources) and is not likely to accomplish the task. Local emergency personnel are not capable of covering roads in approximately 15 minutes, if sirens fail at a distance from one another and from emergency personnel headquarters and many fail at once- too many miles of roads, too few personnel; (2) The PA systems or bullhorns on those vehicles are unlikely to be heard inside due to how property is sited, landscaped, insulated and the real uncertainty of whether windows will be open.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.
newer technologies	FEMA-2008-0022-0106-036	Nebraska Emergency Management Agency, Jonathan Schwarz	Is Route Alerting an adequate backup alerting system?	Noted	Backup route alerting is an acceptable backup to the siren system as long as it can provide coverage of essentially 100% of the population in the event the primary method is unavailable.
newer technologies	FEMA-2008-0022-0127-005	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page II-33, 34, 35 E6: Comment: It was hoped that this criterion would take into consideration the use of various electronic and information technology systems to bolster the ability to reach the public and provide a multi-layered notification capability. The thrust of this criterion seems to remove the innovation process and reinforce old technology whose purported coverage is easy to discreetly quantify and evaluate. The criterion reaches further back and implies that a manual back-up notification system is required through the use of route alerting which is intensely resource depleting and marginally effective but easy to quantify and evaluate. There is little consideration given to the effect of the layering of a combination of systems (DHS IPAWS Model) which when used in concert could provide a significant notification synergy even if a single element evaluated in isolation provided only partial a piece of the notification coverage.	Modified	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
newer technologies	FEMA-2008-0022-0097-028	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	An acceptable backup method should include independent means of activating a robust siren system that provides overlapping coverage throughout the EPZ Requiring a completely independent means of public alerting may even discourage licensees from improving coverage and activation capabilities of existing siren systems. Rather than focus on a single backup method, such as route alerting (the effectiveness of which is dubious), the guidance should encourage the use of as many extant methods as possible to get the message out to the public (the IPAWS model). If reverse 911 type of systems are to be considered acceptable backup alertand notification systems, will FEMA develop acceptance criteria for these types of systems? As it stands now, the only direction the requirement for a backup means seems to be going is to require route alerting in addition to siren systems.	Modified	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
newer technologies	FEMA-2008-0022-0116-043	Nuclear Energy Institute, Alex Marion	Rather than focus on a single backup method, such as route alerting (the effectiveness of which is dubious), the guidance should encourage the use of as many extant methods as possible to get the message out to the public (the IPAWS model).	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
newer technologies	FEMA-2008-0022-0116-014	Nuclear Energy Institute, Alex Marion	The proposed guidance does not recognize current efforts at the Federal and State level to develop comprehensive emergency alert and notification systems which utilize a wide range of technologies to disseminate messages under diverse conditions and events. These technologies can be utilized for supplemental nuclear power plant emergency alerting and notification purposes, and would be more effective than single purpose methods developed solely for nuclear power plant emergencies. A case in point is the FEMA Integrated Public Alert and Warning System (IPAWS). The vision of IPAWS builds and maintains an effective, reliable, integrated, flexible and comprehensive system that enables the American people to receive alert and warning information through as many means as possible.	Noted	Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
route alerting					
route alerting	FEMA-2008-0022-0121-054	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-35 Line: 27-30 Comments: It is not necessary to have such detail included. This would require the state and counties to have each route mapped and "pre- written"	Noted	Pre-planning of routes is a best practice that allows OROs to develop a realistic estimate of how long it will take to complete alert and notification.
telephone surveys					
telephone surveys	FEMA-2008-0022-0108-209	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 14 - V.b - Has FEMA taken a "statistical sample" of residents? If so, were the results conveyed to the licensee, State and local governments? If not, when will the samples begin? How will information be documented? How will resident be determined? What statistics will FEMA calculate from this data? Will this data be provided to the licensee, State and local governments in an independent document or in the exercise report?	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
telephone surveys	FEMA-2008-0022-0108-212b	Louisiana Department of Environmental Quality, Cheryl Chubb	Has FEMA taken a "statistical sample" of residents? If so, were the results conveyed to the licensee, State and local governments? If not, when will the samples begin? How will information be documented? How will resident be determined? What statistics will FEMA calculate from this data? Will this data be provided to the licensee, State and local governments in an independent document or in the exercise report? (split?)	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
telephone surveys	FEMA-2008-0022-0108-237	Louisiana Department of Environmental Quality, Cheryl Chubb	Has FEMA taken a "statistical sample" of residents? If so, were the results conveyed to the licensee, State and local governments? If not, when will the samples begin? How will information be documented? How will resident be determined? What statistics will FEMA calculate from this data? Will this data be provided to the licensee, State and local governments in an independent document or in the exercise report?	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
telephone surveys	FEMA-2008-0022-0126-014	Pilgrim Watch, Mary Lampert	The Draft says that assurance of continued notification capability may be verified on a statistical basis. However, there is not enough information provided to provide assurance that the surveys will be reliable. For example, sample size is not discussed. The second problem is that there will inevitably be a considerable time lag between constructing, performing, tabulating results of the survey and effectuating any needed change. There is no guarantee that an accident, requiring public notification and offsite response will wait until these steps are completed. The third problem is that it says (at 3), “Designers should do scoping studies at different percent coverage to allow determination of whether an effective increase in capability per unit of cost can be achieved.” Cost/benefit does not belong - prompt notification is a key element in emergency planning and this is supposed to be about protecting the public not protecting the industry’s pocketbook.	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
telephone surveys	FEMA-2008-0022-0129-054	Wisconsin Emergency Management, Teri Engelhart	Page: 14 Line: Second paragraph Comment: The yearly statistical sampling of the residents of all areas within about 10 miles of the EPZ is cost prohibitive and labor intensive. It would be more appropriate to conduct such a survey in conjunction with an Evacuation Time Estimate study	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
telephone surveys	FEMA-2008-0022-0121-139	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: V.d Page: 14 Line: 9 thru 14 Sentence of Summary Paragraph: Every year, or in conjunction with an exercise of the facility, FEMA, in cooperation with the utility operator and/or the State and local governments, will take a statistical sample of the residents of all areas within about 10 miles to assess the public's ability to hear or receive the alerting signal, their awareness of the meaning of the prompt notification message, and the availability of information on what to do in an emergency. Comments: Should the frequency be every 2 years to coincide with biennial exercises or should the frequency be tied to the census?	Modified	The REP Program Manual has been modified to explain that statistical samples are only required when a brand new ANS is installed or a "significant change" to an existing system is made. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
regulatory requirement for backup ANS					
regulatory requirement for backup ANS	FEMA-2008-0022-0078-013	Minnesota Homeland Security and Emergency Management, kevin Leuer	NUREG-0654 Supplement 4 Page 14 Appendix 3, section B.2 item (d) Requires the development of a back-up public alert and notification system Comments What is the basis of the need for a complete redundant alert and notification system? The current Emergency Alert System (EAS) has built in backup and redundancies and it is not a reasonable assumption that the EAS system will fail. A complete redundant back-up system for Alert and Notification is not a reasonable requirement. Systems that may be able to do complete Alert and Notification cannot complete Alert and Notification to large populations in the 15 minute window.	Noted	As explained in the Federal Register notice accompanying the publication of Supplement 4 for comment, several events have occurred in which the alerting portion of the primary ANS was inoperable. As a result, the licensee and OROs would have been unable to alert and notify the public and provide prompt information in an emergency. NUREG-0654/FEMA-REP-1 Supplement 4 includes an amendment to NUREG-0654/FEMA-REP-1, Appendix 3 to require backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.
regulatory requirement for backup ANS	FEMA-2008-0022-0116-041	Nuclear Energy Institute, Alex Marion	The explanation implies that both FEMA and the NRC are looking for a backup method that is a complete alternative to the siren system.	Noted	As explained in the Federal Register notice accompanying the publication of Supplement 4 for comment, several events have occurred in which the alerting portion of the primary ANS was inoperable. As a result, the licensee and OROs would have been unable to alert and notify the public and provide prompt information in an emergency. NUREG-0654/FEMA-REP-1 Supplement 4 includes an amendment to NUREG-0654/FEMA-REP-1, Appendix 3 to require backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
regulatory requirement for backup ANS	FEMA-2008-0022-0055-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	What is the basis of need for a complete redundant alert and notification system? The current Emergency Alert System (EAS) has built in backup and redundancies and it is not a reasonable assumption that the EAS system will fail. A complete redundant back-up system for Alert and Notification is not a reasonable requirement. Systems that may be able to do complete Alert and Notification cannot complete Alert and Notification to large populations in the 15 minute window.	Noted	As explained in the Federal Register notice accompanying the publication of Supplement 4 for comment, as well as NRC's draft interim staff guidance document, several events have occurred in which the alerting portion of the primary ANS was inoperable. As a result, the licensee and OROs would have been unable to alert and notify the public and provide prompt information in an emergency. NUREG-0654/FEMA-REP-1 Supplement 4 includes an amendment to NUREG-0654/FEMA-REP-1, Appendix 3 to require backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.
regulatory requirement for backup ANS	FEMA-2008-0022-0078-034	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-34 Lines 30-32 On what basis is the need for a complete redundant alert and notification system? The current Emergency Alert System (EAS) is designed with built-in backup and redundancies. It is not a reasonable assumption that EAS will fail because of the redundancy within the EAS system. Being required to have a 100 percent backup redundant system for Alert and Notification is cost prohibitive and unnecessary with today's technology. What does this require that would constitute "backup means"? A completely redundant system? This should be clarified and some examples given. What systems exist that are capable of complete alert and notification to large populations in the required 15 minute window?	Noted	As explained in the Federal Register notice accompanying the publication of Supplement 4 for comment, several events have occurred in which the alerting portion of the primary ANS was inoperable. As a result, the licensee and OROs would have been unable to alert and notify the public and provide prompt information in an emergency. NUREG-0654/FEMA-REP-1 Supplement 4 includes an amendment to NUREG-0654/FEMA-REP-1, Appendix 3 to require backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA.
regulatory requirement for backup ANS	FEMA-2008-0022-0114-002	Count of Lancaster, Pennsylvania , Randall Gockley	The current guidance for route alerting demonstration is ample. The exception to this is the 45 minute guidance requirement, which in some areas of the County is impractical and almost impossible to meet in some cases due to rural venues and limited resources. Additional back up and redundant systems, such as reverse 911 and e-mail alerts, must be recognized as an alternative to actual travel of route alert teams.	Noted	In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
regulatory requirement for backup ANS	FEMA-2008-0022-0106-034	Nebraska Emergency Management Agency, Jonathan Schwarz	The addition of NUREG-0654/FEMA-REP-1, Appendix 3, Section B.2 d) is not reasonable or appropriate. Local jurisdictions are responsible for warning the public based upon State guidance and Annexes developed for local jurisdictions. The Nuclear Power Station should not perform, nor will they be allowed to perform a governmental function required by Nebraska. Backup means of alert and notification are the responsibility of the local jurisdiction in all-hazard situations.	Noted	The licensee is responsible for ensuring the system is in place; the OROs are responsible for implementing the system.
regulatory requirement for backup ANS	FEMA-2008-0022-0126-015	Pilgrim Watch, Mary Lampert	Problems with current notification systems are underscored in a recent GAO document, EMERGENCY PREPAREDNESS, Improved Planning and Coordination Necessary for Development of Integrated Public Alert and Warning System, Sept 30, 2009, GAO-09-1044T. Although the report does not reference nuclear reactor accidents; it is clear that GAO's comments apply here. GAO concludes at page 12 that,Emergency communications are critical in crisis management and for protecting the public in situations of war, terrorist attack, or natural disaster; yet, FEMA has made limited progress in implementing a comprehensive, integrated alert system as is the policy of the federal government. Management turnover, inadequate planning, and a lack of stakeholder coordination have delayed implementation of IPAWS and left the nation dependent on an antiquated, unreliable national alert system. FEMA's delays also appear to have made IPAWS implementation more difficult in the absence of federal leadership as states have forged ahead and invested in their own alert and warning systems. In order that IPAWS achieve the federal government's public alert and warning goals, it is essential that FEMA define the specific steps necessary in realizing a modernized and integrated alert system and report on the progress toward achieving that end. Additionally, effectively implementing an integrated alert system will require collaboration among a broad spectrum of stakeholders.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. IPAWS guidance will be incorporated into the REP Program Manual as appropriate.
regulatory requirement for backup ANS	FEMA-2008-0022-0108-207	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 13 - V.a - Will FEMA evaluate the backup ANS system?	Noted	NRC and FEMA recognize that the responsibility for activating the prompt notification system called for in this section is properly the responsibility of State and local governments. NRC and FEMA also recognize that the responsibility for demonstrating that such a system is in place rest with the facility licensee. Reference: page 3-1, NUREG 0654. FEMA will evaluate OROs on the activation of the backup system.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
"essentially 100%"					
"essentially 100%"	FEMA-2008-0022-0126-021	Pilgrim Watch, Mary Lampert	FEMA: NUREG-0654/FEMA-REP-1, Appendix 3, Section B.2 d says that, "Utility operators shall identify and develop, in conjunction with State and local officials, both the administrative and physical means for a backup public alert and notification system capable of covering essentially 100% of the population within the entire plume exposure EPZ in the event the primary method is unavailable. The backup means of alert and notification shall be conducted within a reasonable time." The Draft's use of the words "essentially 100%" and "conducted within a reasonable time" requires greater specification. What is reasonable for the licensee may not seem reasonable to the public. Comment: The loose language negates any enforcement capability.	Noted	The term "essentially" is taken directly from the original language of NUREG-0654/FEMA-REP-1, Appendix 3, paragraph B.2.b.
"essentially 100%"	FEMA-2008-0022-0117-011	California Emergency Management Agency, Elaine Jennings	Some proposed modifications to NUREG-0654 B.2 are too vague. ExplanationPage 13 - The word "essentially" is added. The phrase "essentially 100% coverage" requires quantification. Please define this phrase to remove any ambiguity so there is no discrepancy between demonstration and evaluation.	Noted	The term "essentially" is taken directly from the original language of NUREG-0654/FEMA-REP-1, Appendix 3, paragraph B.2.b (page 3-3)
"essentially 100%"	FEMA-2008-0022-0078-033	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-34 Lines 25, 26, 30 The term "essentially" needs to be defined more clearly.	Noted	The term "essentially" is taken directly from the original language of NUREG-0654/FEMA-REP-1, Appendix 3, paragraph B.2.b (page 3-3)
"essentially 100%"	FEMA-2008-0022-0121-051	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-34 Line: 25 Comments: What is meant by "essentially"?	Noted	The term "essentially" is taken directly from the original language of NUREG-0654/FEMA-REP-1, Appendix 3, paragraph B.2.b (page 3-3)
when does timing start					
when does timing start	FEMA-2008-0022-0108-208	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 13 - V.b - Define "within 15 minutes" of what?	Noted	Except for situations with an initial declaration of or rapid escalation to Site Area Emergency or General Emergency, demonstration of alert and notification should occur in a timely manner and without undue delay from the time the decision makers receive notification from the warning point. Backup alerting should occur within a reasonable time of the ORO becoming aware of the primary system failure, with a suggested goal of 45 minutes.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Clarifica-tion of "supple-mental" alerting					
clarification of "supplemental" alerting	FEMA-2008-0022-0073-002	Washington Military Department Emergency Management Division, Jim Mullen	Document: NUREG-0654 SUPP. 4Page Ref: pp. 13-14Comment: Section V.b. of the Supplement summarizes the changes to Appendix 3, Section B.2. The State and locals were confused about what the intent of the changes really mean. In one case (B.2.c.) the supplemental notification methods will occur within 45 minutes of the original notification using the primary ANS system. In the other case (B.2.d.), a backup alert and notification system will occur "within a reasonable time." Are not these supplemental/backup systems the same thing?Potential Impact: Confusion about which time requirement is the correct one. Recommend changing both to the same requirement; "a reasonable time"Comment By: State/Locals	Modified	The REP Program Manual has been revised for clarity. "Supplemental" and "backup" alerting systems are not the same thing. Supplemental systems, as used in the draft published for comment, refers to alerting methods other than sirens used to augment primary alerting systems in exception areas, and are subject to the 45 minute design specification. The term "supplemental" has been replaced with "exception area" for clarity. Backup alerting is the system used in the event that there is a failure in the primary system and should be conducted in a reasonable time. Although the same types of systems may be used to accomplish primary and backup alerting, they are redundant systems. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
clarification of "supplemental" alerting	FEMA-2008-0022-0073-075	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-34Comment: Lines 30-32. Criterion E.6. The 45-minute requirement for supplemental and/or back-up route alerting to be complete is unreasonable, especially during a 'fast-breaker' incident. Recommend changing the 45-minute time to apply to the beginning of the supplemental and/or back-up route alerting be changed to 'reasonable time given additional efforts.'Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-90 minutes away, depending on the severity and time of day/year of the incident. This would prevent the supplemental notification from being completed within 45 minutes.	Modified	The REP Program Manual has been revised for clarity. "Supplemental" and "backup" alerting systems are not the same thing. Supplemental systems, as used in the draft published for comment, refers to alerting methods other than sirens used to augment primary alerting systems in exception areas, and are subject to the 45 minute design specification. The term "supplemental" has been replaced with "exception area" for clarity. Backup alerting is the system used in the event that there is a failure in the primary system and should be conducted in a reasonable time. Although the same types of systems may be used to accomplish primary and backup alerting, they are redundant systems. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS					
time requirement for backup ANS	FEMA-2008-0022-0108-212a	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 16 - V - App 3, Section B.2 - Define "reasonable time."	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0020-014	Ashtabula County EMA, George Rolland	Page Ref. II-34 and 35 Comment: The 45-minute requirement for supplemental and/or back-up route alerting to be complete is unreasonable, especially during a 'fast-breaker' incident. Suggest change the 45-minute time to apply to the beginning of the supplemental and/or back-up route alerting be changed to 'reasonable time given additional efforts.' Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0021-014	Geauga County DES, Dale Wedge	Page Ref. II-34 and 35 Comment: The 45-minute requirement for supplemental and/or back-up route alerting to be complete is unreasonable, especially during a 'fast-breaker' incident. Suggest change the 45-minute time to apply to the beginning of the supplemental and/or back-up route alerting be changed to 'reasonable time given additional efforts.' Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0036-014	Lake County EMA, Larry Greene	Page Ref. II-34 and 35 Comment: The 45-minute requirement for supplemental and/or back-up route alerting to be complete is unreasonable, especially during a 'fast-breaker' incident. Suggest change the 45-minute time to apply to the beginning of the supplemental and/or back-up route alerting be changed to 'reasonable time given additional efforts.' Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0020-013	Ashtabula County EMA, George Rolland	Page Ref. II-34 and 35 Comment: The discussion of backup route alerting does not account for the addition of HAB activities. The 45-minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. Given that primary resources that would do backup route alerting would be engaged in HAB response, the need to bring people from outside the EPZ would be required. It is recommended that the 45-minutes (line 14-16) be changed to "reasonable time given additional efforts" or something similar. Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0021-013	Geauga County DES, Dale Wedge	Page Ref. II-34 and 35 Comment: The discussion of backup route alerting does not account for the addition of HAB activities. The 45-minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. Given that primary resources that would do backup route alerting would be engaged in HAB response, the need to bring people from outside the EPZ would be required. It is recommended that the 45-minutes (line 14-16) be changed to "reasonable time given additional efforts" or something similar. Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0036-013	Lake County EMA, Larry Greene	Page Ref. II-34 and 35 Comment: The discussion of backup route alerting does not account for the addition of HAB activities. The 45-minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. Given that primary resources that would do backup route alerting would be engaged in HAB response, the need to bring people from outside the EPZ would be required. It is recommended that the 45-minutes (line 14-16) be changed to "reasonable time given additional efforts" or something similar. Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-60 minutes away, depending on the severity of the incident. Comment by: Locals	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0106-055	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-34, Line 21, thru Page II-36, Line 3Comment: Continuing with the 45 minute time limit for Back-up Route Alerting for any event, man-made or natural where additional resources may be needed to to accomplish this action is unreasonable. This should be changed to within a "Timely Manner".Potential Impact: NRC/FEMA once again are looking to ensure states and locals fail in mandated exercises by placing a limit on such things.	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0106-032	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Pages 12 through 15Comment: Ref V. Backup means for alerting and notification systems. Timeframes? 100% notification. What is the requirement?What technologies will be considered?What does “essentially 100%” of the population constitute?	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance. Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. The term “essentially” is taken from the original language of NUREG-0654/FEMA-REP-1, Appendix 3, paragraph B.2.b. Metrics do not yet exist to verify the effectiveness of most newer technologies. These technologies may be used, but only to augment primary alert and notification unless effectiveness equal to current standards (FEMA-REP-10) can be demonstrated. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting (coordinated with OROs). Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. See the Physical Means of Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0086-011	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	For backup alert and notification, Page II, line 31: states “backup means of alert and notification shall be conducted within a reasonable time”; Page II-35, line 26: states “the suggested time for completion of backup route alerting is 45 minutes”; Page II-34, line 29 states: that “exception area notification must occur within 45 minutes”. Comments: The language referring to backup alert and notification needs to be standardized. The wording varies within the same criterion. Improved wording is suggested similar to the previous comment. The recommended change for backup alerting or exception areas could be: "alert and notification should be conducted in a timely manner with no undue delay and within a goal of 45 minutes".	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0073-014	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-34Comment: Lines 30-32. Criterion E.6. The discussion of backup route alerting does not account for the addition of HAB activities. The 45-minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. Given that primary resources that would do backup route alerting may be engaged in HAB response, the need to bring people from outside the EPZ would likely be required. It is recommended that the 45-minutes (line 14-16) be changed to "reasonable time given additional efforts" or something similar.Potential Impact: In a HAB event, the resources needed to supplement the locals tasked with back-up route alerting may be 45-90 minutes away, depending on the severity of the incident and the travel time/distance that supplemental resources require to respond.	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0079-008	Delaware Emergency Management Agency, James Turner	Part II Page 34 and 35 Issue: Backup route alerting does not account for the addition of HAB activities. Basis/Comment: The 45-minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. The primary backup route alerting may be engaged in HAB response, the need to bring other route alerting personnel would delay time. Recommend the 45-minute time be changed to “within reasonable time given additional efforts”. Guidance would be provided for determining the acceptability of the backup methods based on the alerting and notification capabilities of the methods selected. The rule making does not provide a clear picture of the expectations for backup notification.	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0090-007	York County Office of Emergency Management, James Welty	Page II – 35 lines 25 – 26: As stated above, the suggested time for completion of backup route alerting is 45 minutes. Comment: Reading this section on back up alert and notification it goes from “reasonable time” to “attempt to establish” to “suggested” time of 45 minutes. I feel the requirement should be within a reasonable time. If this is a HAB event the next due ORO may be more than 45 minutes away. A 45 minute requirement would not allow time for them to be dispatched, given a briefing, provided equipment and completing the notification.	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0108-211	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 14 - V.b.d - Define "reasonable time."	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0116-046	Nuclear Energy Institute, Alex Marion	Part II.C, E.6, p. II-35 (lines 7-16): Remove 45 minute requirement for backup means of ANS. Basis: According to both the draft NRC ISG and Supplement 4, NUREG-0654/FEMA-REP-1, Appendix 3, Section B.2, is revised	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0130-010	State of Vermont, Barbara Farr	II-34 and 35: Backup route alerting does not account for addition of Hostile Action Based activities.Basic CommentsThe 45 minute time is not reasonable given travel time for supplemental resources needed to accomplish the action. The primary personnel responding for route alerting may actually be engaged in HAB response. We recommend that 45 minutes be changed to “within a reasonable time given additional efforts”.	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
time requirement for backup ANS	FEMA-2008-0022-0117-012	California Emergency Management Agency, Elaine Jennings	Page 14 – "The backup means of alert and notification shall be conducted within a reasonable time." Please define reasonable time to remove any ambiguity so there is no discrepancy between demonstration and evaluation.	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0111-038	Illinois Emergency Management Agency, Andrew Velasquez	The backup means of public alert and notification system guidance is totally vague, i.e., "shall be conducted within a reasonable time." As stated previously IEMA recommends 3 hours.	Rejected	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0121-052	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-34 Line: 32 Comments: What is meant by "reasonable time"?	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
time requirement for backup ANS	FEMA-2008-0022-0106-035	Nebraska Emergency Management Agency, Jonathan Schwarz	Who defines "reasonable time"?	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.7					
Criterion E.7	FEMA-2008-0022-0097-030	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion E.7 The explanation suggesting minimal contents of supplemental public information to EAS messages should consider some of the additional guidance that is currently contained in theAppendix A to the proposed NRC PAR rulemaking. NUREG/ CR XXXX App A (authored by Randy Sullivan) should be incorporated here in this sectionBASIS: The guidance in Appendix A of the proposed NRC PAR rule would be more appropriate in FEMA REP guidance (G.1 for example) than in an NRC rulemaking that is applicable to licensees only. Guidance for content of public notification messages needs to be consistent between REP Manual and NUREG XXXX App. A and clearly delineate responsibilities between licensees and OROs.	Noted	The commenter's suggestion has been taken into consideration for future revisions of the REP Program Manual.
Criterion E.7	FEMA-2008-0022-0116-047	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion E.7 – The explanation suggesting minimal contents of supplemental public information to EAS messages should consider some of the additional guidance that is currently contained in the Appendix A to the proposed NRC PAR rulemaking. NUREG/ CR XXXX App A (authored by Randy Sullivan) should be incorporated here in this sectionBasis: The guidance in Appendix A of the proposed NRC PAR rule would be more appropriate in FEMA REP guidance (G.1 for example) than in an NRC rulemaking that is applicable to licensees only. Guidance for content of public notification messages needs to be consistent between REP Manual and NUREG XXXX App. A and clearly delineate responsibilities between licensees and OROs.	Noted	The commenter's suggestion has been taken into consideration for future revisions of the REP Program Manual.
Criterion E.7	FEMA-2008-0022-0110-017	Alabama Emergency Management Agency, J Frank Price	page II-36, lines 26-28: Messages should contain information decided on by the State public Health Officer and such things like “ad hoc respiratory protection” could cause public fear unwarranted	Noted	See the footnote to Criterion E.7 stating that ad-hoc respiratory protection is not generally recommended. The source of the reference to ad-hoc respiratory protection is the original NUREG-0654/FEMA-REP-1 language. FEMA and the NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.7	FEMA-2008-0022-0101-033	Florida Division of Emergency Management, Michael Younger	Page II-36, lines 26-30 As noted in the footnote, ad hoc respiratory protection is not generally recommended. As such, criterion E.7 should be revised to delete any references to ad hoc respiratory protection.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion E.7	FEMA-2008-0022-0121-055	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-37 Line: 8 thru 9 Comments: The EAS massages currently provide identification of the state and local government, but to require to inclusion of the person with authority to send the message is too much detail and unnecessary.	Noted	This is not a new requirement. EAS messages in commonly cite the individual with the authority to send the message, e.g., "The Governor has declared a State of Emergency…"
Criterion E.7	FEMA-2008-0022-0042-008	Ned Wright	Page II-37, Line 17: Needs a comment on the timeliness of the supplementary messages after the EAS alert message goes out. Though not tied to the 15 minute clock as the initial EAS Message, the supplemental public information needs to be submitted for broadcast very quickly. Needs some clarifying statement such as “as soon as possible,” or “within 30 minutes.”	Accepted	The cited REP Program Manual language has been amended to read "in a timely manner." See Follow-up Messages subsection within the Explanation section of Evaluation Criterion E.7 in Part II.C - Planning Guidance.
Criterion E.7	FEMA-2008-0022-0086-012	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-37, footnote at bottom of the page: “Messages must be pre-scripted in non-English languages that are spoken by more than 5 percent, based on current studies, ,of the county population of voting age”. Comments: In some cases, the demographics of non-English speaking populations in county urban centers may be quite different from demographics in the EPZ portion of the county. Is the intent of the footnote to refer to population demographics within the EPZ only? This distinction should be clarified.	Modified	No, the intent is to refer to the entire county. The information being disseminated is received in a wider area. The cited language comes from the Voting Rights Act and is intended to apply to the full county population. REP Program Manual language has been added for clarity that reads, "For counties that lie only partially in the EPZ, this applies to the population of the entire county, not just the portion in the EPZ." See the Non-English Langauge Messages subsection within the Explanation Subsection of Evaluation Criterion E.7 in Part II.C
Criterion E.7	FEMA-2008-0022-0095-028	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-38, lines 7-8 (E.7), the use of the emergency alert system is to provide critical information to the public related to life safety issues. It is not an appropriate mechanism for rumor control. The more the system is used for such activities, the less impact it is likely to have on the general public when true emergency information needs to be relayed. Rumor control issues need to be addressed in supplemental forms of information such as special news broadcasts and press releases.	Modified	REP Program Manual language has been amended to address other means of providing rumor control so that it reads, "...the process by which the contents of public information (e.g., EAS messages, press releases, special news broadcasts, etc.) can be adapted..." rather than only EAS messages. Means used should be described in ORO plans/procedures. See the Follow-up messages subsection within the Explanation Subsection of Evaluation Criterion E.7 in Part II.C.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion E.7	FEMA-2008-0022-0098-027	Kansas Department of Health and Environment, Thomas Conley	Page II-38, lines 7-8 (E.7), the use of the emergency alert system is to provide critical information to the public related to life safety issues. It is not an appropriate mechanism for rumor control. The more the system is used for such activities, the less impact it is likely to have on the general public when true emergency information needs to be relayed. Rumor control issues need to be addressed in supplemental forms of information such as special news broadcasts and press releases.	Modified	REP Program Manual language has been amended to address other means of providing rumor control so that it reads, "...the process by which the contents of public information (e.g., EAS messages, press releases, special news broadcasts, etc.) can be adapted..." rather than only EAS messages. Means used should be described in ORO plans/procedures. See the Follow-up messages subsection within the Explanation Subsection of Evaluation Criterion E.7 in Part II.C.
Criterion E.7	FEMA-2008-0022-0101-034	Florida Division of Emergency Management, Michael Younger	Page II-38, lines 7-8 The use of the emergency alert system is to provide critical information to the public related to life safety issues. It is not an appropriate mechanism for rumor control. The more the system is used for such activities, the less impact it is likely to have on the general public when true emergency information needs to be relayed. Rumor control issues need to be addressed in supplemental forms of information such as special news broadcasts and press releases.	Modified	REP Program Manual language has been amended to address other means of providing rumor control so that it reads, "...the process by which the contents of public information (e.g., EAS messages, press releases, special news broadcasts, etc.) can be adapted..." rather than only EAS messages. Means used should be described in ORO plans/procedures. See the Follow-up messages subsection within the Explanation Subsection of Evaluation Criterion E.7 in Part II.C.
Criterion E.7	FEMA-2008-0022-0121-056	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-38 Line: 7 thru 8 Comments: a "process" by which - Why must a "process" be included? (actually requires several of them) This is too much detail and is unnecessary.	Noted	The process should be documented in the plans/procedures. The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.
Criterion E.7	FEMA-2008-0022-0108-036	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-38 Line: 12 Comment: Missing a period at the end of the sentence.	Accepted	The REP Program Manual has been amended as suggested. See Non-English Language Messages subsection within the Explanation section of Evaluation Criterion E.7 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard F					
Planning Standard F	FEMA-2008-0022-0095-029	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Planning Standard F (Emergency Communications) states in several places that communications systems should be interoperable with a number of agencies. Interoperability of communications systems is not always within the control of any one agency. Funding and personal preference drive the communication system used by government agencies at all levels. Federal agencies don't use the communication equipment that is interoperable, so why would a state or local agencies need to have interoperability? It is clear that communications are the main point of failure for most exercises and particularly for those with multiple federal, state and local agencies involved. However, it is an unreasonable expectation to require that interoperability be a requirement for REP plans. Clearly, it is an ideal that we should strive for, but it will probably never happen. Agencies can communicate effectively with a combination of systems that are not interoperable. There should never be a requirement for interoperable communication systems and pages II-39, line 9, II-42, line 8 appear to require interoperable communications systems	Noted	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.
Planning Standard F	FEMA-2008-0022-0098-028	Kansas Department of Health and Environment, Thomas Conley	Planning Standard F (Emergency Communications) states in several places that communications systems should be interoperable with a number of agencies. Interoperability of communications systems is not always within the control of any one agency. Funding and personal preference drive the communication system used by government agencies at all levels. Federal agencies don't use the communication equipment that is interoperable, so why would a state or local agencies need to have interoperability? It is clear that communications are the main point of failure for most exercises and particularly for those with multiple federal, state and local agencies involved. However, it is an unreasonable expectation to require that interoperability be a requirement for REP plans. Clearly, it is an ideal that we should strive for, but it will probably never happen. Agencies can communicate effectively with a combination of systems that are not interoperable. There should never be a requirement for interoperable communication systems and pages II-39, line 9, II-42, line 8 appear to require interoperable communications systems.	Noted	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard F	FEMA-2008-0022-0080-010	Douglas Fleck	Planning Standard F, which runs from page II-39 thru page II-45 is an example of a missed opportunity for modernizing and streamlining the REP program. It is no longer 1979. The communication systems and requirements listed on the pages have been in existence for years now. Has FEMA detected a trend during the biennial evaluations that show that the state and local governments are consistently being found with dysfunctional communication equipment and procedures? Are states and counties regularly forgetting to periodically test their communications? Have there been instances were we have suddenly discovered licensees forgot to set up communications systems with the affected OROs? Communications plans and equipment have already been thought of and exist for hostile events. REP and the new fad called HAB are not the only game in town and state and local jurisdictions have been playing in the NIMS world longer than FEMA and the NRC. This entire section is redundant and needs to go away.	Rejected	The cited text is a NUREG-0654/FEMA-REP-1 Planning Standard. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. In accordance with HSPD-5, REP must align with the National Response Framework and other National Preparedness Systems, adopt to the changing risks and environment, and provide guidance to OROs on the REP Program in strong cooordination with stakeholders and the NRC.
Planning Standard F	FEMA-2008-0022-0080a-010	Pennsylvania Emergency Management Agency, Douglas Fleck	page II-39 thru page II-45 is an example of a missed opportunity for modernizing and streamlining the REP program. It is no longer 1979. The communication systems and requirements listed on the pages have been in existence for years now. Has FEMA detected a trend during the biennial evaluations that show that the state and local governments are consistently being found with dysfunctional communication equipment and procedures? Are states and counties regularly forgetting to periodically test their communications? Have there been instances were we have suddenly discovered licensees forgot to set up communications systems with the affected OROs? Communications plans and equipment have already been thought of and exist for hostile events. REP and the new fad called HAB are not the only game in town and state and local jurisdictions have been playing in the NIMS world longer than FEMA and the NRC. This entire section is redundant and needs to go away.	Rejected	The cited text is a NUREG-0654/FEMA-REP-1 Planning Standard. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. In accordance with HSPD-5, REP must align with the National Response Framework and other National Preparedness Systems, adopt to the changing risks and environment, and provide guidance to OROs on the REP Program in strong cooordination with stakeholders and the NRC.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard F	FEMA-2008-0022-0100-013	Pennsylvania Emergency Management Agency, Henry Tamanini	(Pages II-39 thru II-45) addresses EmergencyCommunications. It should be noted that many technological advances haveoccurred since the issuance of NUREG-0654 in 1980. This entire section should be updated to reflect state-of-the-art technology and procedures.Communications drills and testing as reported within the Annual Letter ofCertification should be evidence of successful compliance with thecommunication requirements. NIMS and “Interoperability” should also beincorporated within this section.	Modified	Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment. FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion F.1.a					
Criterion F.1.a	FEMA-2008-0022-0113-017	North Carolina Division of Emergency Management, Stephen Payne	Page II-38, Line 9RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING WHICH INCLUDED THIS STATEMENT AT THE BEGINNING OF EACH SUBSECTION.BASIS:This statement should be returned to the start of each of the sub sections to maintain readability and understanding of the subsection.	Noted	FEMA has decided to follow the exact format of NUREG-0654/FEMA-REP-1 in the REP Program Manual.
Criterion F.1.a	FEMA-2008-0022-0108-040	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-39 Line: 26 Comment: Define "recommended."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.a	FEMA-2008-0022-0113-018	North Carolina Division of Emergency Management, Stephen Payne	Page II-41, Line 11-19DELETE THIS SECTION How are these communications needs truly different from those needed in a radiological event? (See lines 7-8) The only additional Federal agency is the FBI.BASIS: As addressed here, ICS is something new, only used in HAB events. NIMS and the National Response Framework direct the use of ICS methodology in all hazard responses. ORO's currently use ICS methodology tailored to the event response.	Rejected	OROs are in varying stages of working toward full interoperability. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.
Criterion F.1.c					
Criterion F.1.c	FEMA-2008-0022-0108-042	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-41 Line: 1-25 Comment: Need to separate items and specify "The plans/procedures should include descriptions of:."	Modified	The commenter's suggestion is inconsistent with FEMA policy and best practices for any emergency situation. The intent of this guidance is to point out planning considerations for HAB incidents and provide specific examples of additional resource capabilities that may be needed for effective response. The following sentence after the bullets indicates more generally that OROs should ensure that they have effective communication protocols and methods.
Criterion F.1.c	FEMA-2008-0022-0097-032	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-41, Line 9-28 LLEA/Fire Response communications capabilities already exist and new requirements that must be demonstrated should not be imposed upon the industry/OROs for an event at a NPP. The capabilities should be established for ANY event. Once again the NPPs are being singled out when a hostile event could occur at and public venue or critical infrastructure. REP Manual should NOT govern interoperability between all response agencies (including tactical) – this is a national response issue and can not be resolved via the REP program.	Noted	Existing planning for augmented resources responding to a hostile action at a nuclear power plant varies by ORO. The guidance related to HAB incidents is intended to assist OROs that have not yet fully developed these plans.
Criterion F.1.c	FEMA-2008-0022-0101-035	Florida Division of Emergency Management, Michael Younger	Page II-41, lines 9-10 and 12-17 The move to interoperable communications is still an ongoing project that will take years to complete. To include interoperable communications as part of this manual could subject OROs to exercise and planning issues and may be interpreted as an unfunded mandate. The intent needs to be the tasks/objectives that must be accomplished, not necessarily how it will be accomplished. As described in criterion F.1, systems should be compatible with one another. The specific citation requiring the systems to be interoperable should be referenced in the appropriate criterion. Expanded ORO communications are not specific to a hostile action at a NPP, but have an all hazards component as well as considerations for other potential targets of a hostile action.	Rejected	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.c	FEMA-2008-0022-0128-011	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-41, lines 9-21, These interoperable, redundant, reliable communication systems with non-traditional REP entities are not the responsibility of the Licensee, state, or locals. We cannot dictate to the federal government the requirements to accomplish this action within our state. This would have to be mandated by the federal government for all such agencies – down to the type of hardware required to achieve such interoperability. We understand there are some efforts in government to accomplish this, but it is not universal.LLEA/Fire Response communications capabilities already exist and new requirements that must be demonstrated should not be imposed upon the industry/OROs for an event at a NPP. REP Manual should not govern interoperability between all response agencies (including tactical) – this is a national response issue and cannot be resolved via the REP program. Explanation/Recomendation Revise this section:“Response to an HAB event requires access to the traditional REP communications capabilities. To ensure effective communications during HAB events, communication protocols and methods should be described to ensure effective and timely communications between command elements and where appropriate, tactical response elements.”	Rejected	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.c	FEMA-2008-0022-0117-022	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, F.1.c, page II-41, lines 9-21: Response to an HAB event requires expansion of the traditional REP communication capabilities.Specific issues may include:The need for interoperable, redundant, and reliable communication with the licensee and among the EOC and Incident Command elements (Incident Command Post/Unified Command and staging areas);The need for interoperable, redundant, and reliable communication with non-traditional REP entities and locations (e.g., staging areas, ICP, Federal Bureau of Investigation (FBI), DHS, and the Department of Health and Human Services);The need for procedures (safeguards) for the sharing of sensitive information during HAB events between and among Federal, State, and local agencies and the licensee; andThe need for primary and backup communication (safeguards) to support the exchange of sensitive information.Comments: Interoperable communications currently exists at all levels of ORO response organizations. Both state and federal guidance exists regarding this issue.Procedures currently exist for the handling of sensitive Law Enforcement information. explanation/RecommendatioN: The sharing of law enforcement sensitive information is commonly practiced throughout state and federal agencies. There is no need to develop new standards or capabilities for REP specific HAB incidents.The recommended capabilities already exist. Remove this section.	Noted	Procedures addressing sensitive information may be incorporated by reference. The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals.
Criterion F.1.c	FEMA-2008-0022-0110-018	Alabama Emergency Management Agency, J Frank Price	page II-41, lines9-25: Extending communication systems for all LE is not needed. LE has the ability to notify the public. Interoperability is being created within the response community	Noted	Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.
Criterion F.1.c	FEMA-2008-0022-0129-010	Wisconsin Emergency Management, Teri Engelhart	Page: II-41, Line: 9 - 28, Comment: Interoperability is an initiative that is covered under all-hazards programs and may be funded by Homeland Security grant funding.If it is made a requirement under the REP program, it would become an unfunded mandate and an undue financial burden to the utility in the form of equipment purchases, training, upgrades and/or maintenance.	Noted	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.c	FEMA-2008-0022-0097-031	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-41, Lines 9-28: Not necessarily an expansion, but access to and use of existing law enforcement, security systems in an event. There is no standard being offered here, instead a vision for all agencies (including tactical) to unilaterally share any and all information on interoperable, redundant systems which is simply too broad and unrealistic and not reflective of day-to-day protocols and systems that are used for other criminal events. Revise this section: "Response to an HAB event requires expansion of access to the traditional REP communications capabilities."Specific issues may include:• The need for interoperable, redundant, and reliable communication with the licensee and among the EOC and ICP and staging areas.• The need for interoperable, redundant, and reliable communication with nontraditional REP entities and locations• The need for procedures (safeguards) for the sharing of sensitive information during HAB events between and among Federal, State, and local agencies and the licensee; and,• The need for primary and backup communication (safeguards) to support the exchange of sensitive information." To ensure effective communications during HAB events, communication protocols and methods should be designed described to ensure effective and timely communications between command elements and where appropriate, tactical response elements."	Rejected	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.c	FEMA-2008-0022-0116-048	Nuclear Energy Institute, Alex Marion	Part II.C, F.1.c, p. II-41 (lines 9-28): Not necessarily an expansion, but access to and use of existing law enforcement, security systems in an event. There is no standard being offered here, instead a vision for all agencies (including tactical) to unilaterally share any and all information on interoperable, redundant systems which is simply too broad and unrealistic and not reflective of day-to-day protocols and systems that are used for other criminal events. Revise this section:"Response to an HAB event requires [del: expansion of] [und: access to] the traditional REP communications capabilities. [del: "Specific issues may include:- The need for interoperable, redundant, and reliable communication with the licensee and among the EOC and ICP and staging areas. - The need for interoperable, redundant, and reliable communication with non-traditional REP entities and locations - The need for procedures (safeguards) for the sharing of sensitive information during HAB events between and among Federal, State, and local agencies and the licensee; and, - The need for primary and backup communication (safeguards) to support the exchange of sensitive information."]To ensure effective communications during HAB events, communication protocols and methods should be [del: designed] [und: described] to ensure effective and timely communications between command elements and where appropriate, tactical response elements."	Rejected	Comment is inconsistent with FEMA policy and best practices for any emergency situation. Interoperability is a goal toward which all OROs are encouraged. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.
Criterion F.1.c	FEMA-2008-0022-0108-041	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-41 Line: 20 Comment: Is it expected for plans/procedures to include "safeguard" issues?	Noted	Procedures addressing sensitive information may be incorporated by reference. The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.d					
Criterion F.1.d	FEMA-2008-0022-0097-034	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion F.1.d Delete the explanatory statement concerning descriptions of primary and backup systems for interoperable communications among all components of the ICS. The statement concerning primary and backup systems with other types of field units should also be deleted.BASIS: This guidance goes far beyond what is intended by this criterion and infringes upon day-to-day public safety communications. The criterion pertains to the nuclear facility capability to communicate with the identified facilities and radiological field monitoring teams, not to the capabilities of all facilities and field personnel to communicate, in an interoperable mode, among one another.	Rejected	The comment is inconsistent with FEMA policy and best practices for any emergency situation, The ICS is a flexible, scalable response structure that is appropriate for use in all hazards, and FEMA encourages OROs to ensure operable communications among all ICS components.
Criterion F.1.d	FEMA-2008-0022-0116-050	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion F.1.d – Provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams. Part II.C, Criterion F.1.d –Delete the explanatory statement concerning descriptions of primary and backup systems for interoperable communications among all components of the ICS. The statement concerning primary and backup systems with other types of field units should also be deleted.Basis: This guidance goes far beyond what is intended by this criterion and infringes upon day-to-day public safety communications. The criterion pertains to the nuclear facility capability to communicate with the identified facilities and radiological field monitoring teams, not to the capabilities of all facilities and field personnel to communicate, in an interoperable mode, among one another.	Rejected	The comment is inconsistent with FEMA policy and best practices for any emergency situation, The ICS is a flexible, scalable response structure that is appropriate for use in all hazards, and FEMA encourages OROs to ensure operable communications among all ICS components.
Criterion F.1.d	FEMA-2008-0022-0101-036	Florida Division of Emergency Management, Michael Younger	Page II-42, lines 8-9 Again, the intent of this criterion needs to be the tasks/objectives that must be accomplished, not necessarily how it will be accomplished. This statement would appear to require both the primary and any (all listed) backup communications systems to be interoperable. The term "interoperable" should be deleted entirely from the criteria listed under F.1.	Rejected	The comment is inconsistent with FEMA policy and best practices for any emergency situation. FEMA encourages OROs to ensure operable communications among all ICS components. In order to provide reasonable assurance that OROs can protect the health and safety of the public, everyone must be able to communicate with one another in an emergency. However, OROs will not be penalized for not having the most state-of-the-art equipment.
Criterion F.1.d	FEMA-2008-0022-0110-019	Alabama Emergency Management Agency, J Frank Price	page II-42, lines 8-14: "Describe primary and backup systems for interoperable communication" is too detailed. ICS develops com plans with backup procedures during the incident, that is a ICS concept that this change is requiring	Noted	A description of the general system available is appropriate.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.d	FEMA-2008-0022-0113-019	North Carolina Division of Emergency Management, Stephen Payne	Page II-42, Line 9 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING“Plans/procedures should describe primary and backup systems for interoperable communication with the EOF.”BASIS:Incident Command System (ICS) is a methodology originally written for dealing with wildfires not a structured response mechanism. It has the flexibility to be used for handling emergency events. Additional training and understanding of ICS will be required by the Utilities to fully implement this activity.	Rejected	The comment is inconsistent with FEMA policy and best practices. The ICS is a flexible, scalable response structure that is appropriate for use in all hazards. FEMA encourages OROs to ensure operable communications among all ICS components. The requirement to ensure communication with the EOF is addressed in the first bullet under plans/procedures.
Criterion F.1.d	FEMA-2008-0022-0020-015	Ashtabula County EMA, George Rolland	Page Ref. II-42 Comment: Line 13 and 14 calls out the need to specify the location of base stations and organizations that operate it. Too prescriptive; need to know only that there will be a base station and it will be operated in a secure manner. Potential Impact: The base station could be a mobile command van that is on the move or it may be at a Sheriff's Dispatch Center or other location. It may/could change based on the incident. Comment by: Locals	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0021-015	Geauga County DES, Dale Wedge	Page Ref. II-42 Comment: Line 13 and 14 calls out the need to specify the location of base stations and organizations that operate it. Too prescriptive; need to know only that there will be a base station and it will be operated in a secure manner. Potential Impact: The base station could be a mobile command van that is on the move or it may be at a Sheriff's Dispatch Center or other location. It may/could change based on the incident. Comment by: Locals	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0036-015	Lake County EMA, Larry Greene	Page Ref. II-42 Comment: Line 13 and 14 calls out the need to specify the location of base stations and organizations that operate it. Too prescriptive; need to know only that there will be a base station and it will be operated in a secure manner. Potential Impact: The base station could be a mobile command van that is on the move or it may be at a Sheriff's Dispatch Center or other location. It may/could change based on the incident. Comment by: Locals	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0086-013	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-42, line 14:Comments: The language provided in the explanation is overly prescriptive. Depending on the event, the base station could be a mobile command vehicle and the operator could vary depending on the nature of the incident. The wording should be revised to state that there will a base station and that it will be operated to maintain communications security.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.d	FEMA-2008-0022-0102-028	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-42, Line 14: The language provided in the explanation is overly prescriptive. Depending on the event, the base station could be a mobile command vehicle and the operator could vary depending on the nature of the incident. The wording should be revised to state that therewill a base station and that it will be operated to maintain communications security.Rationale: Comment provided to simplify communications requirements and allow for incident-dependent flexibility.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0097-033	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-42, Line 14-15: Too prescriptive. Need to know only that there will be a base station and it will be operated in a secure manner.BASIS: The base station could be a mobile command van that is on the move; the location/operator may change based on the incident.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0097-035	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-42, Lines 14-15: The plans/procedures should indicate the location of the base and specify what organization operates it.COMMENT: Too prescriptive. Need to know only that there will be a base station and it will be operated in a secure manner.BASIS: The base station could be a mobile command van that is on the move; the location/operator may change based on the incident.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.d	FEMA-2008-0022-0116-049	Nuclear Energy Institute, Alex Marion	Part II.C, F.1.d, p. II-42 (lines 14-15): The plans/procedures should indicate the location of the base and specify what organization operates it. Part II.C, F.1.d, p. II-42 (lines 14-15): Too prescriptive. Need to know only that there will be a base station and it will be operated in a secure manner. Basis: The base station could be a mobile command van that is on the move; the location/operator may change based on the incident.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text.
Criterion F.1.d	FEMA-2008-0022-0128-012	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-42, lines 14-15: The plans/procedures should indicate the location of the base and specify what organization operates it.COMMENTs: Need to know only that there will be a base station and it will be operated in a secure manner. The base station will most likely be mobile, the location/operator may change based on the incident.Explanation/RecomendationRevise this section: The plans/procedures should indicate that a base station will be utilized and operated in a secure fashion.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.d	FEMA-2008-0022-0109-025	Ottawa County, Ohio, Koch Beth	page II-42, lines 14-15: The plans/procedures should indicate the location of the base and specify what organization operates it.COMMENT: The location of the base could vary depending on a variety of circumstances. OROs are familiar with designating a base as situations mandate.	Modified	Specifics of the base station are in ORO plans/procedures. Location could be "mobile unit." Clarification of this point has been added to the REP Program Manual text. See the Explanation section of Evaluation Criterion F.1.d in Part II.C - Planning Guidance.
Criterion F.1.e					
Criterion F.1.e	FEMA-2008-0022-0129-011	Wisconsin Emergency Management, Teri Engelhart	Page: II-42, Line: 32 Comment: Criteria F.1.e - The paragraph is unfinished	Noted	The cited sentence is a direct quote of NUREG-0654/FEMA-REP-1 text. It appears unfinished because it is not adjacent to the same text in the REP Program Manual as it is in NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion F.1.e	FEMA-2008-0022-0113-020	North Carolina Division of Emergency Management, Stephen Payne	Page II-42, Line 34 – 36, Page II-45 Line 1-5 RECOMMENDATION/COMMENT: REWRITE TO ADD VERBAGE FROM N.2.a.Minimum frequencies for testing certain communication links are described in Criterion N.2.a.as the following:- State and local communications systems will be tested monthly.- Communications with the Federal response organizations and States within the ingestion pathway will be tested quarterly.- Communications with the nuclear facility, State and local EOCs, and field assessment teams will be tested annually.All communications drills should include a message content check.	Rejected	The existing reference back to N.2.a is adequate. Adding the additional text would make the document unnecessarily longer.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.e	FEMA-2008-0022-0106-056	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-43, Lines 5-8Comment: While the first bullet in lines 3-4 makes sense for a plan, the second bullet in lines 5-8 needs to be removed. NRC/FEMA is now trying to insist that States and Local Emergency First Responders activate response personnel based on a Nuclear Power Station's Emergency Classification Levels and reflect it in public plans that "bad guys" can read. And we tell them just where to go to get that information. NRC/FEMA is getting way too deep in the weeds in its planning requirements on how emergency first reponder organizations will do their job. A plan will become so thick with hyperbole that no one will want to read, review it, or use it and will ignore it due to the fact that what NRC/FEMA insist happen is not in keeping with their normal procedures.Potential Impact: In a real event the plan may not be followed.	Rejected	The existing text states that such lists may be incorporated by reference. The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals.
Criterion F.1.f					
Criterion F.1.f	FEMA-2008-0022-0108-043	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-43 Line: 21 Comment: Typo - "Emergncy" should be "Emergency."	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion F.1.f in Part II.C - Planning Guidance.
Criterion F.1.f	FEMA-2008-0022-0020-016	Ashtabula County EMA, George Rolland	Page Ref. II-43 Comment: Second Emergency in line 21 is spelled incorrectly.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion F.1.f in Part II.C - Planning Guidance.
Criterion F.1.f	FEMA-2008-0022-0021-016	Geauga County DES, Dale Wedge	Page Ref. II-43 Comment: Second Emergency in line 21 is spelled incorrectly.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion F.1.f in Part II.C - Planning Guidance.
Criterion F.1.f	FEMA-2008-0022-0036-016	Lake County EMA, Larry Greene	Page Ref. II-43 Comment: Second Emergency in line 21 is spelled incorrectly.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion F.1.f in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion F.1.f	FEMA-2008-0022-0109-004	Ottawa County, Ohio, Koch Beth	page II-4, [II-43] lines 17-18: The term “near-site” EOF.COMMENT: Remove “near site” to reflect current regulations.	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion F.3					
Criterion F.3	FEMA-2008-0022-0108-044	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-44 Line: 20 Comment: References two criterion and has three footnote references. Less is more, reduce the distractions. All three footnotes, refer to NUREG-0654/FEMA-REP-1. Keep the criterion, reduce the footnotes to one, the NUREG-0654.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion F.3 in Part II.C - Planning Guidance.
Planning Standard G					
Criterion G.1					
Criterion G.1	FEMA-2008-0022-0088-002	Anonymous	Pages II-46 through II-50. NUREG Criteria G.1 and G.2: The explanation provided in the manual of the respective focus of these two criteria is contradictory to the information taught in FEMA’s REP Planning Course. The planning course teaches that G.1 is about what information should be included in public education materials, acknowledging that different content may be appropriate for different forms (e.g., postings in public areas directed at transient populations vs. publications such as calendars directed at resident populations). G.2 is about identifying all populations that should receive the educational materials and appropriate distribution venues to ensure that virtually everyone in the EPZ has access to the information. This distinction is clear upon careful reading of the NUREG text for each criterion. The statements in the respective explanations for G.1 (p. II-46, line 25) and G.2 (p. II-50, lines 6-8) that G.1 is about information for resident populations and G.2 about information for transient populations is very confusing and inaccurate given that the NUREG language in both criteria refers to information appropriate for resident as well as transient populations. While the information in both explanations is generally good, it needs to be reorganized between the two criteria to reflect the correct focus of each.	Accepted	Noted - the REP Program Manual has been reviewed for consistency with the new planning course. The explanations for G.1 and G.2 have been reviewed and modified for consistency with the respective NUREG-0654/FEMA-REP-1 criterion language. See the Explanation section of NURGE Criterion G.1 an G.2 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.1	FEMA-2008-0022-0108-045	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-46 Line: 32 Comment: Define "timely" in reference to annual distribution of materials.	Modified	The term "timely" has been deleted in this instance to avoid confusion over its meaning. See the Information for the General Public subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
Criterion G.1	FEMA-2008-0022-0042-009	Ned Wright	Page II-48, Line24; Page II-85, Line 26; Page II-86, Line 30, Line 31, Line 33, Line 36, Line 28, and Line 39; Page II-91, Line 23; and Page II-102, Line 18: Term “Disabled” Replace with term “Special Needs.”	Modified	The REP Program Manual has been amended to replace the term "disabled" with "Persons with disabilities and access/functional needs."
Criterion G.1	FEMA-2008-0022-0086-015	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-48, Line 4: Also, if FEMA intends to continue to allow for "reception centers" and "relocation centers" to be used interchangeably, it should so state. Otherwise, it is recommended that one term (e.g., "relocation center") be adopted.	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified (See Appendix B - Glossary of REP Terms). There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.
Criterion G.1	FEMA-2008-0022-0110-020	Alabama Emergency Management Agency, J Frank Price	page II-47: Too many details of required actions. Much of the information are in the locals counties EOPs and may vary by local ORO	Noted	The cited text refers to information in the plans, not in the public information itself.
Criterion G.1	FEMA-2008-0022-0119-001	Progress Energy, Kenneth Heffner	More clarification is needed here to address FEMAs policy that is stated in NRC Emergency Preparedness Position Paper 5 as follows: "It is FEMA 's policythat methods, such as telephone book inserts, are acceptable with the understanding that a more comprehensive emergency planning document, such as a brochure, should be issued once every three years. A brochure would be needed to assure that new plume exposure pathway EPZ residents are informed of emergency planning information and to capture emergency planning information changes which may have occurred over the past three years in one document.” A statement should be added to rulemaking to allow sites currently implementing this method to continue.	Rejected	The cited guidance has been superseded. Current policy as defined in the REP Program Manual is to issue full public information annually. FEMA has provided this comment to the NRC for situational awareness.
Criterion G.1	FEMA-2008-0022-0113-022	North Carolina Division of Emergency Management, Stephen Payne	Page II-46. Line 38 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“A detailed informationof how EPZ residents will be notified and where they should turn for emergency information and instructions.”	Accepted	The REP Program Manual has been amended as suggested. See Information for the General Public subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.1	FEMA-2008-0022-0116-088	Nuclear Energy Institute, Alex Marion	Part II.G1, (Line 38): A clear discussion of how EPZ residents will be notified and where they should turn for emergency information and instructions. Part II.G1, (Line 38): Replace “A clear discussion” with “Detailed information” Basis: Less vague.	Accepted	The REP Program Manual has been amended as suggested. See Information for the General Public subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance.
Criterion G.1	FEMA-2008-0022-0101-038	Florida Division of Emergency Management, Michael Younger	Page II-46, lines 38-39 The phrase “clear discussion” should be replaced with “clear description.	Modified	The phrase "clear discussion" has been replaced with "detailed information." See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
Criterion G.1	FEMA-2008-0022-0086-014	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-48, line 4: Comments: This language is overly prescriptive and may be contrary to local ORO policies. For example, congregate care center information is often not provided to the public until evacuees have arrived at the designated reception/relocation centers for monitoring and registration. Publication of congregate care center information would cause reception/relocation centers potentially to be bypassed. Also, many ORO plans and public information materials direct populations from EPZ areas to proceed to designated reception/relocation centers and do not offer various ones to choose from because of available services (e.g., pets). It is recommended that the wording be modified to address this concern.	Noted	The guidance as written does not require that congregate care locations be published.
Criterion G.1	FEMA-2008-0022-0108-048	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-48 Line: 9-10 Comment: What does "which may include references to additional sources of information" refer to? Based on the sentence, it can be inferred that it relates to "garden products" not "agricultural information." Rephrase.	Modified	The cited language in the REP Program Manual has been clarified to read, "and commercial agricultural or home garden products." See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
Criterion G.1	FEMA-2008-0022-0108-046	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-48 Line: 14 Comment: "Will likely be available" makes it sound unreliable. Might as well change the phrasing to "should."	Rejected	The existing language is an accurate reflection of FEMA's intent.
Criterion G.1	FEMA-2008-0022-0128-016	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-48, line 37: “as appropriate public information materials should be developed for those such as the visually impaired, hearing impaired, or those who speak languages other than English”.COMMENTs: Being hearing impaired should have no impact on the public information that is being referenced in this section as it pertains to written materials.Explanation/recommendation: Give examples of information materials that should be provided to the hearing impaired or delete reference.	Accepted	The REP Program Manual has been amended as suggested. See Information for the General Public subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
"plain language"					
"plain language"	FEMA-2008-0022-0113-021	North Carolina Division of Emergency Management, Stephen Payne	Page II-46.Lines 30-34 RECOMMENDATION/COMMENT: REWORDReplace term “plain English” and “plain language” with “easy to understand plain language” as follows:“The licensee and State, local, and/or tribal governments will provide information annually to the general public located within the plume EPZ. All information should be written in “easy to understand plain language” and be clear, accurate, consistent, timely, and complete to ensure it is easily understood by members of the public.The same “easy to understand plain language” easy to understand plain language” principle shall be applied to all information translated into non-English languages provided to the public.BASIS:NIMS requires communication to be in “Plain English”. Use of the term “Easy to understand plain language” is more descriptive and less ambiguous and meets the intent of NIMS.	Rejected	The REP Program Manual has been amended throughout to use the term "plain language" for consistency with existing Federal guidance. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
"plain language"	FEMA-2008-0022-0097-078	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 11-46, Line 38: COMMENT: Replace “plain English” with “easy to understand” Replace “plain language” with “easy to understand” Replace “A clear discussion” with “Detailed information”BASIS: “Plain English” is ambiguous. “Easy to understand” is more descriptive and less ambiguous; phrase is also used in JIS section Less vague.	Modified	The REP Program Manual has been amended throughout to use the term "plain language" for consistency with existing Federal guidance. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
"plain language"	FEMA-2008-0022-0101-037	Florida Division of Emergency Management, Michael Younger	Page II-46, lines 30-32 The term “plain English” should be replaced with “plain language” for clarity and consistency with the term used in line 33 as it relates to non-English translations.	Rejected	The REP Program Manual has been amended throughout to use the term "plain language" for consistency with existing Federal guidance. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
"plain language"	FEMA-2008-0022-0116-087	Nuclear Energy Institute, Alex Marion	Part II.G1, (lines 30-34): Replace “plain English” with “easy to understand” Replace “plain language” with “easy to understand” Basis: “Plain English” is ambiguous. “Easy to understand” is more descriptive and less ambiguous; phrase is also used in JIS section	Rejected	The REP Program Manual has been amended throughout to use the term "plain language" for consistency with existing Federal guidance. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
unlicensed daycare centers					
unlicensed daycare centers	FEMA-2008-0022-0079-009	Delaware Emergency Management Agency, James Turner	Part II Page 47 Issue: The reference concerning daycares. Basis/Comment: Statement should stipulate licensed daycares. There is no mechanism to identify unlicensed daycares.	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0090-008	York County Office of Emergency Management, James Welty	Page II-47, Line 32-34: Change the word all day care centers to licensed day care centers. It is impossible to know all the unlicensed day care centers within the EPZ	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B).
unlicensed daycare centers	FEMA-2008-0022-0020-017	Ashtabula County EMA, George Rolland	Page Ref. II-47 Comment: Revise line 33 from "all" to "licensed" day care centers. Potential Impact: Impossible to know of all (licensed & unlicensed) day cares in a given area. No mechanism exists to track the unlicensed. Comment by: Locals	Accepted	Agreed. However, exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0021-017	Geauga County DES, Dale Wedge	Page Ref. II-47 Comment: Revise line 33 from "all" to "licensed" day care centers. Potential Impact: Impossible to know of all (licensed & unlicensed) day cares in a given area. No mechanism exists to track the unlicensed. Comment by: Locals	Accepted	Agreed. However, exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0036-017	Lake County EMA, Larry Greene	Page Ref. II-47 Comment: Revise line 33 from "all" to "licensed" day care centers. Potential Impact: Impossible to know of all (licensed & unlicensed) day cares in a given area. No mechanism exists to track the unlicensed. Comment by: Locals	Accepted	Agreed. However, exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
unlicensed daycare centers	FEMA-2008-0022-0073-015	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-47Comment: Line 33. Criterion G.1. Line 33. Recommend changing "all" to "licensed" day care centers.Potential Impact: Impossible to know of all (licensed & unlicensed) day cares in a given area. No mechanism exists to track the unlicensed other than through voluntary registration.Comment By: State/Locals	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0130-011	State of Vermont, Barbara Farr	II-48: DaycaresBasic CommentsThere is no way to identify an unlicensed day or child care facility. Change all references to day care centers to “licensed or approved child care facilities”.	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
information on special needs populations					
information on special needs populations	FEMA-2008-0022-0101-040	Florida Division of Emergency Management, Michael Younger	Page II-47, lines 25 and 27-28 The annual information document provided to the public is not an appropriate place to discuss either the provisions for determining special needs or how the information will be protected. The provisions for determining special needs within a jurisdiction should already be included in a comprehensive emergency management plan or other all hazards planning document such as FEMA’s Evacuee Support Planning Guide. The annual public information document should be an extension of the process already in place by which special needs populations can register for assistance. A statement in a return letter acknowledging receipt of their registration could address how that information will be protected.	Modified	The cited text indicates that the annual plans should inform the public that OROs have made provisions for populations of people with disabilities and access/functional needs. It is not FEMA's intent that the actual information on populations of people with disabilities and access/functional needs be part of the annual plan. See the "Identification of Individuals Who Need Assistance During an Evacuation" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
information on special needs populations	FEMA-2008-0022-0097-037	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-47, Line 27-28: COMMENT: New requirement should not be included in REP. Delete requirementBASIS: Need justification for this as an added expectation for REP vs. universal emergency management practice by local emergency management.	Modified	The cited text indicates that the annual plans should inform the public that OROs have made provisions for populations of people with disabilities and access/functional needs. It is not FEMA's intent that the actual information on populations of people with disabilities and access/functional needs be part of the annual plan. See the "Identification of Individuals Who Need Assistance During an Evacuation" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
information on special needs populations	FEMA-2008-0022-0116-052	Nuclear Energy Institute, Alex Marion	Part II.C, G.1. p II-47 (lines 27-28): Provisions for determining special needs…The material should address how personal information will be protected by those governmental agencies. Part II.C, G.1. p II-47 (lines 27-28): New requirement should not be included in REP. Delete requirement Basis: Need justification for this as an added expectation for REP vs. universal emergency management practice by local emergency management.	Rejected	The cited text indicates that the annual plans should inform the public that OROs have made provisions for special needs populations. It is not FEMA's intent that the actual information on special needs populations be part of the annual plan.
information on special needs populations	FEMA-2008-0022-0128-013	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-47, lines 27-28: Provisions for determining special needs…The material should address how personal information will be protected by those governmental agencies.COMMENTs: Need justification for this as an added expectation for REP vs. universal emergency management practice by local emergency management. Explanation/Recomendation :Delete requirement	Rejected	The cited text indicates that the annual plans should inform the public that OROs have made provisions for populations of people with disabilities and access/functional needs. It is not FEMA's intent that the actual information on populations of people with disabilities and access/functional needs be part of the annual plan.
correctional facilities					
correctional facilities	FEMA-2008-0022-0108-047	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-48 Line: 4-6 Comment: Don't be vague. Include the reference to "correctional facilities."	Modified	This section of the REP Program Manual language has been modified, and the cited bullet has been deleted. However, please note that individuals subject to judicial or legislative orders restricting their freedom of movement include not only those housed in correctional facilities, but also people under house arrest, surveillance, and prohibited from entering certain types of establishments, among others. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
correctional facilities	FEMA-2008-0022-0108-049	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-48 Line: 27-29 Comment: Don't be vague. Include the reference to "correctional facilities."	Modified	This section of the REP Program Manual language has been modified, and the cited bullet has been deleted. However, please note that individuals subject to judicial or legislative orders restricting their freedom of movement include not only those housed in correctional facilities, but also people under house arrest, surveillance, and prohibited from entering certain types of establishments, among others. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
individuals subject to judicial restraint					
individuals subject to judicial restraint	FEMA-2008-0022-0106-057	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-48, Lines 30 - 32Comment: Once again NRC/FEMA are in the weeds. Does NRC/FEMA think that Judges/LLEA/ Parole Officers have not already thought of this for any emergency and instructed people whose freedom has been restricted (i.e. that they are under house arrest or told they where can not go, etc.) what to do in an emergency and where to go? Delete this bullet.	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
individuals subject to judicial restraint	FEMA-2008-0022-0097-036a	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion G.1 What does the explanation statement pertaining to public information including procedures and facilities to manage “evacuation of individuals subject to judicial and/or legislativeorders restricting their freedom of movement in certain areas of the community” mean? Does it refer to plans/procedures for prisons, jails, halfway houses, court-monitored persons, parolees, probationers, etc. This seems unnecessary for the purposes of public information materials.	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
individuals subject to judicial restraint	FEMA-2008-0022-0116-051	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion G.1 – What does the explanation statement pertaining to public information including procedures and facilities to manage “evacuation of individuals subject to judicial and/or legislative orders restricting their freedom of movement in certain areas of the community” mean? Does it refer to plans/procedures for prisons, jails, halfway houses, court-monitored persons, parolees, probationers, etc. This seems unnecessary for the purposes of public information materials. The part of the explanation that requires efforts to communicate emergency public information for any non-English language that is spoken by less than 5% of the voting age population is wide open and undefined. The explanatory statement described above.Basis: Reasonable efforts to reach out to people in this category may be warranted, but the statements in this part of the explanation are too prescriptive. Another example of an attempt to include post-Katrina day-to-day public safety considerations that should not be included nor evaluated in the REP Program.	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
individuals subject to judicial restraint	FEMA-2008-0022-0128-014	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-48, lines 4 -6, 27 – 29 The public information shall include information on procedures and facilities to manage “evacuation of individuals subject to judicial and/or legislative orders restricting their freedom of movement in certain areas of the community”.COMMENTs: What does “individuals subject to judicial or legislative orders restricting their freedom of movement” mean? Does it refer to plans/procedures for prisons, jails, halfway houses, court-monitored persons, parolees, probationers, etc. This is unnecessary details for the purposes of public information materials.Explanation/Recomendation: Delete this portion of the explanation.	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
individuals subject to judicial restraint	FEMA-2008-0022-0020-018	Ashtabula County EMA, George Rolland	Page Ref. II-48 Comment: Line 27 thru 29 discusses actions to be taken for judicial (prisoners) but this section is under G.1 which is public education and information. Unclear if information is to be provided to incarcerated individuals or if just action by LLEA is all that is required. What about those under 'house arrest?' Comment by: Locals	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
individuals subject to judicial restraint	FEMA-2008-0022-0021-018	Geauga County DES, Dale Wedge	Page Ref. II-48 Comment: Line 27 thru 29 discusses actions to be taken for judicial (prisoners) but this section is under G.1 which is public education and information. Unclear if information is to be provided to incarcerated individuals or if just action by LLEA is all that is required. What about those under 'house arrest?' Comment by: Locals	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
individuals subject to judicial restraint	FEMA-2008-0022-0036-018	Lake County EMA, Larry Greene	Page Ref. II-48 Comment: Line 27 thru 29 discusses actions to be taken for judicial (prisoners) but this section is under G.1 which is public education and information. Unclear if information is to be provided to incarcerated individuals or if just action by LLEA is all that is required. What about those under 'house arrest?' Comment by: Locals	Modified	The cited text has been deleted from Evaluation Criterion G.1. The original intent was to address provisions for individuals who may be legally prohibited from evacuating to a public shelter. However, it does not need to be included in the information disseminated to the general public. OROs can find guidance on this issue in national disaster planning guidance for shelter procedures. See the "Information for the General Public" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language translations (Voting Rights Act)					
foreign language translations (Voting Rights Act)	FEMA-2008-0022-0073-016	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-49Comment: Lines 5-15. Criterion G.1. Recommend adding reference to Part 203 of the Voting Rights Act and include the URL listed further back in the REPP Manual to specify which counties meet the 5% of voting age rule. However, there are several dialects of Spanish spoken in Mexico. Would the dialect used by court-certified translators be the standard or would just any translated dialect of Spanish be okay? There has been comment made by evaluators on the proper dialect used in emergency messaging. They were told that it was what was used by a court-certified translator. Recommend providing guidance on what constitutes proper translation of a document.Potential Impact: Using the Voting Rights Act provides specificity as to which counties have languages that will require translation of public information documents. The translation of public education materials into multiple languages requires expense that can be planned for. However, there is disagreement between which translation is the correct translation when it comes to different dialects in a given area (e.g., different Spanish dialects from Mexico.)	Accepted	Section 203 of the Voting Rights Act concerns languages spoken on a county-wide basis. A reference to the electronic version of the Voting Rights Act has been added to the REP Program Manual (See Foreign Language Translation of Public Information Materials subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance). Written translations of languages do not present the possible misunderstandings that spoken dialects may present. FEMA Regions and RACs can work with OROs to determine the best dialects of given languages to use in oral EAS messages.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language translations (Voting Rights Act)	FEMA-2008-0022-0101-043	Florida Division of Emergency Management, Michael Younger	Page II-49, lines 5-8 This sentence needs to be consistent with the verbiage used in lines 30-37 on Page II-48 regarding 5 percent of the county population instead of the EPZ population.	Accepted	The cited REP Program Manual text has been amended to read, "At a minimum, public information materials shall be translated into any non-English language spoken in the EPZ where that language is spoken by more than 5% of the respective county population of voting age (based on current demographic studies)." See Foreign Language Translation of Public Information Materials subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language translations (Voting Rights Act)	FEMA-2008-0022-0101-042	Florida Division of Emergency Management, Michael Younger	Page II-48, lines 30-37 Since the requirement is 5 percent or more of the total county population, then there should be no reference to the EPZ population as is currently made in the first sentence. Further, this section is not well structured and should be revised to be more clear and concise such as "Provisions for translation of public information materials into any non-English language spoken by 5 percent or more of the county population of voting age (based on current demographic studies). Information shall also be accessible to special needs populations located within the EPZ, such as the visual and hearing impaired. All translated information should be clear, accurate, consistent and complete, as appropriate, to ensure that it is easily understood by members of the public."	Modified	The cited REP Program Manual text has been amended to read, "At a minimum, public information materials shall be translated into any non-English language spoken in the EPZ where that language is spoken by more than 5% of the respective county population of voting age (based on current demographic studies)." See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population					
foreign language information for less than 5% of the population	FEMA-2008-0022-0129-012	Wisconsin Emergency Management, Teri Engelhart	Page: II-49, Line: 5 Comment: Efforts made to provide public education materials to populations of less than 5% speaking any single language. The use of the word "shall" obligates the OROs to identify all non-English speaking individuals and in provide some type of outreach to these individuals. (Technically, this can mean 1 person.) This is impractical as it would require a door-to-door survey to identify such individuals and identification and contracting with a bilingual person to deliver the outreach. While OROs should be encouragedto provide outreach to non-English speakers, using the criteria of "less than 5 percent" is unrealistic and a voluntary and volunteer run program may be viable.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language information for less than 5% of the population	FEMA-2008-0022-0110-021	Alabama Emergency Management Agency, J Frank Price	page II-49, line 5: This line is not consistence with the proceeding page that is greater than 5% and here it is less than 5% which could mean that it does not need to be done for a population greater than 5%	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0121-057	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-49 Line: 5 thru 15 Comments: For any non-English language that is spoken by less than 5% could literally mean hundreds of languages. This would be a significant burden on state and local governments in terms of manpower and printed materials.	Modified	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0097-039	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-49, Line 5-15: New section should not be included in REP. Need justification for this as an added expectation for REP vs. universal emergency management practice by local emergency management. Another post-Katrina lesson learned that is misplaced in the REP Program.	Noted	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0020-019	Ashtabula County EMA, George Rolland	Page Ref. II-49 Comment: Suggest delete lines 5-15 requirement. In many parts of the country <5% could apply to potentially 100+ languages.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0021-019	Geauga County DES, Dale Wedge	Page Ref. II-49 Comment: Suggest delete lines 5-15 requirement. In many parts of the country <5% could apply to potentially 100+ languages.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language information for less than 5% of the population	FEMA-2008-0022-0036-019	Lake County EMA, Larry Greene	Page Ref. II-49 Comment: Suggest delete lines 5-15 requirement. In many parts of the country <5% could apply to potentially 100+ languages.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0078-038	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-49 Lines 5-15 Are the bullet points outlined here going to be required or can other actions be taken?If other actions can be taken, what level of activities will be required?	Noted	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0116-054	Nuclear Energy Institute, Alex Marion	Part II, c, G.1. p II-49 (lines 5-15): For any non-English language that is spoken by less than 5 percent of the county population voting age within the EPZ……" Part II, c, G.1. p II-49 (lines 5-15): New section should not be included in REP Basis: Need justification for this as an added expectation for REP vs. universal emergency management practice by local emergency management. Another post-Katrina lesson learned that is misplaced in the REP Program.	Noted	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language information for less than 5% of the population	FEMA-2008-0022-0109-026	Ottawa County, Ohio, Koch Beth	page II-49, lines 5 -15: For any non-English language that is spoken by less than 5 percent of the county population of voting age within the EPZ, if translations of public information materials are not provided in that language, then other efforts shall be made to afford that population protection similar to that provided to the general population within the EPZ. Such efforts might included the following activities:· Special courses of instruction for the non-English language community leaders· Public meetings featuring a speaker trained in the relevant non-English language· Training leaders of neighborhood organizations· Advertisements in non-English language newspapers· Providing oral assistance to individuals who lack English language proficiency through a “buddy” system.These efforts should be adapted to local circumstances to achieve the purpose of the PI Program; ensuring that the population within the EPZ is knowledgeable regarding how they will be alerted and provided instructions about what they are supposed to do in the event of a radiological emergencyCOMMENT: REP should not be singled out to address this concern. This is an issue that applies to every communication whether emergency or routine.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0078-037	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-49 Lines 5-15 What is the minimum population where this will not be a requirement? Will these activities be required for a single non-English speaking person living in the EPZ?	Noted	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0128-017	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-49, lines 5-15: For any non-English language that is spoken by less than 5 percent of the county population voting age within the EPZ…….”COMMENTs: This new requirement should not be added to REP program. This requirement would be extremely burdensome for the OROs as languages spoken by less than 5% of the population could literally be any and every language spoken.Explanation/recommendation: Delete lines 5 – 15.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language information for less than 5% of the population	FEMA-2008-0022-0130-012	State of Vermont, Barbara Farr	Page II-49: Non English language of 5% or less, provided information such as special courses, public meetings and literature.Basic CommentsRecommend that the percentage be modified to 10%. Some states could be heavily impacted with this 5% criterion.	Rejected	The “5%” requirement derives from section 203 of the Voting Rights Act and cannot be changed to 10% as recommended by the commenter. FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0079-010	Delaware Emergency Management Agency, James Turner	Part II Page 49 Issue: Non English language of 5% or less provided information such as special courses public meetings and non English literature. Basis/Comment: In some states this could be multiple languages. Recommend that the percentage be modified to 10%.	Rejected	The “5%” requirement derives from section 203 of the Voting Rights Act and cannot be changed to 10% as recommended by the commenter. FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0086-018	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-49: Comments: This recommendation could lead to the creation of many individual public information programs for as few as one non-English speaking person. This section should be deleted or clarification provided regarding a lower target limit for "less than 5 percent" of the county EPZ population.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0097-036b	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The part of the explanation that requires efforts to communicate emergency public information for any non-English language that is spoken by less than 5% of the voting age population is wide open and undefined. The explanatory statement described above.BASIS: Reasonable efforts to reach out to people in this category may be warranted, but the statements in this part of the explanation are too prescriptive. Another example of an attempt to include post-Katrina day-to-day public safety considerations that should not be included nor evaluated in the REP Program.	Noted	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
foreign language information for less than 5% of the population	FEMA-2008-0022-0102-031	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-49, Line 12: First comment: It is conceivable that this could involve the management of a multitude of public information programs for extremely small numbers of non-English speaking individuals, and could theoretically include only one person. This section should be deleted or clarification provided concerning practical planning threshold. Second comment: The terms “shall” and “might” are confusing concerning the extent to which public information efforts are required to reach very small numbers of non-English speaking individuals.Rationale: The intent of this criterion is now unclear as to the acceptability of public education programs for small non-English speaking segments of the EPZ and lacks a practical threshold.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
foreign language information for less than 5% of the population	FEMA-2008-0022-0106-058	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-49, Lines 12 - 29Comment: This section needs to be deleted. It is an unfunded mandate and puts an overwhelming burden on REP planners to ensure that all non-english speaking populations less than 5% get attention.Potential Impact: Overwhelming cost time and money for little gain.	Rejected	FEMA recognizes that in many parts of the country, there may be numerous languages represented by very small populations. The REP Program Manual provides guidance to help OROs identify various options for reaching such populations. The actual implementation of these suggestions will be tailored to local circumstances. See the "Foreign Language Translation of Public Information Materials" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.
ingestion pathway public informatio n					
ingestion pathway public information	FEMA-2008-0022-0088-012	Anonymous	In addition, none of the guidance in G.1 or G.2 addresses public information specific to the ingestion exposure pathway. FEMA guidance, including FEMA-REP-11 and GM IN-1, addressed this aspect of public information, but was apparently overlooked for inclusion in the program manual. Evidence of such information is specifically required in exercise Criterion 3.e.2.	Modified	Ingestion pathway public information guidance has been added to NUREG-0654/FEMA-REP-1 Criterion G.1, the public information development guide, and the Annual Letter of Certification checklist. See the "Information for the Ingestion Pathway" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
ingestion pathway public information	FEMA-2008-0022-0088-013	Anonymous	Guidance should be added to G.1, G.2, and the public information checklist in Part IV; likewise, verification of ingestion pathway public information should be added to the annual letter of certification.	Modified	Requirements for all public information has been applied to ingestion public information. See the "Information for the Ingestion Pathway" subsection within the Explanation section in Evaluation Criterion G.1 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
copies of public informatio n in plans					
copies of public information in plans	FEMA-2008-0022-0113-023	North Carolina Division of Emergency Management, Stephen Payne	Page II-47, Line 15-16 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDINGBASIS:This requirement is counter productive to good plan maintenance. A reference to this document in plans or procedures keeps flexibility in this document while not requiring continual plan updates. Previously required to be submitted WITH the plan for review.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0097-038	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-48, Line 12, 15-16: No need for this info to be included in plans or procedures. Info may change mid-year, then Plan or Procedure is "out-of-date". This information now is sent with the Annual Letter of Certification and that's where it belongs.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0116-053	Nuclear Energy Institute, Alex Marion	Part II.C, G.1, p. II-48, (lines 12, 15-16): The plans/procedures should include: A copy of each item (e.g., brochure, calendar, utility bill insert) described above as part of the methods used to disseminate public information. Part II.C, G.1, p. II-48, (lines 12, 15-16): No need for this info to be included in plans or procedures. Info may change mid-year, then Plan or Procedure is 'out-of-date'. Basis: This information now is sent with the Annual Letter of Certification and that's where it belongs.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0128-015	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-48, lines 12, 15-16: The plans/procedures should include:A copy of each item (e.g., brochure, calendar, utility bill insert) described above as part of the methods used to disseminate public information.COMMENTs: Not practical to have each public information material included in plans and procedures. Materials change frequently and would deem the plans out of date. This information is currently and appropriately included with the Annual Letter of Certification.Explanation/recommendation: Delete this requirement.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0109-027	Ottawa County, Ohio, Koch Beth	page II-48, lines 12, 15-16): The plans/ procedures should include: A copy of each item (e.g., brochure, calendar, utility bill insert) described above as part of the methods used to disseminate public information.COMMENT: Materials should only be included with the Annual Letter of Certification.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
copies of public information in plans	FEMA-2008-0022-0112-008	Harford County Division of Emergency Operations, Linda Ploener	Public education and Information: You want us to attach copies of our brochures, calendars, and other printed education materials to our EOP? We have documented the use of various printed educational resources and that should be sufficient. Copies will be provided to evaluators as requested (as usually accomplished) during the exercise. These items shouldn't be attached to the plan!	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0101-041	Florida Division of Emergency Management, Michael Younger	Page II-48, lines 15-16 Copies of such materials should be available to compliment plans and procedures but should not be included in them. Plans and procedures should instead address how the information will be disseminated. Inaddition, this information is submitted annually to FEMA for review as part of the annual letter of certification.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0086-016	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-48, lines 18: Comments: This information is typically described in the annual PR-1 Report submitted for the ALC, and should not be required to be included in ORO plans/procedures. ORO plans/procedures should only describe the scope of the public information program and provide a general description of published materials.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
copies of public information in plans	FEMA-2008-0022-0102-029	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-48, Line 18: This information is typically described in the annual PR-1 Report submitted for the ALC, and should not be required to be included in ORO plans/procedures. ORO plans/procedures should only describe the scope of the public information program and provide a general description of published materials. The cited wording should be deleted.Rationale: This additional detail does not enhance the value for ORO plans/procedures, and is frequently modified. The existing mechanism through the PR-1 report or equivalent ALC process should be sufficient.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2					
Criterion G.2	FEMA-2008-0022-0116-056	Nuclear Energy Institute, Alex Marion	Part II.C, G.2, p.49-50, (lines 40, 10): The criterion makes reference to phone booths which are practically non-existent. Part II.C, G.2, p.49-50, (lines 40, 10): Remove specific references to phone booths.Basis: Cell phone usage has all but eliminated the phone booth as a location frequented by transients	Rejected	Phone booths are becoming less common but are still in use. The references to phone booths has been retained for consistency with NUREG-0654/FEMA-REP-1 language (Evaluation Criterion G.2). Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.2	FEMA-2008-0022-0097-041	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 49-50, lines 40: Remove specific references to phone booths.BASIS: Cell phone usage has all but eliminated the phone booth as a location frequented by transients.	Rejected	Phone booths are becoming less common but are still in use. The references to phone booths has been retained for consistency with NUREG-0654/FEMA-REP-1 language (Evaluation Criterion G.2). Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion G.2	FEMA-2008-0022-0128-018	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-50 (lines 10, 12-13, 15-16, 23- 26): Phone booths are not readily available in most of the US and should not be referenced in this document.This info should not be included in plans or procedures. Info may change mid-year, then Plan or Procedure is 'out-of-date'. This information is currently and appropriately sent with the Annual Letter of Certification.Explanation/recommendationDelete "phone booths" in line 10. Delete lines 12 -26.	Rejected	Phone booths are becoming less common but are still in use. The references to phone booths has been retained for consistency with NUREG-0654/FEMA-REP-1 language (Evaluation Criterion G.2). Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion G.2	FEMA-2008-0022-0020-020	Ashtabula County EMA, George Rolland	Page Ref. II-50 Comment: Line 12 and 13 should be revised to say 'info should be included with ALC.' Potential Impact: This information could change during the year and thus make a plan obsolete. Now included in ALC and suggest that is where it stays. Comment by: Locals	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0021-020	Geauga County DES, Dale Wedge	Page Ref. II-50 Comment: Line 12 and 13 should be revised to say 'info should be included with ALC.' Potential Impact: This information could change during the year and thus make a plan obsolete. Now included in ALC and suggest that is where it stays. Comment by: Locals	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0036-020	Lake County EMA, Larry Greene	Page Ref. II-50 Comment: Line 12 and 13 should be revised to say 'info should be included with ALC.' Potential Impact: This information could change during the year and thus make a plan obsolete. Now included in ALC and suggest that is where it stays. Comment by: Locals	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.2	FEMA-2008-0022-0073-017	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-50Comment: Lines 12 -13. Criterion G.2. Should be revised to say “info should be included with ALC."Potential Impact: This information could change during the year and thus make a plan out-of-date. Recommend referencing the public information items in the plan but only provide a copy with the ALC.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0097-040	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-50, Line 12-13, 15-16, 23: Delete the following: “The plans/procedures should include:• A list of locations where such information is posted.• A copy of each item described above aimed at transient populations within the plume EPZ.”No need for this info to be included in plans or procedures.Info may change mid-year, then Plan or Procedure is ‘out-of-date’.BASIS: This information now is sent with the Annual Letter of Certification and that’s where it belongs.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0116-055	Nuclear Energy Institute, Alex Marion	Part II.C, G.2, p. II-50 (lines 12-13, 15-16, 23): Copies of this information, as appropriate, should be provided to FEMA with the plans/procedures. The plans/procedures should include: - A list of locations where such information is posted. - A copy of each item described above aimed at transient populations within the plume EPZ. Part II.C, G.2, p. II-50 (lines 12-13, 15-16, 23): Delete the following:[del: “The plans/procedures should include: - A list of locations where such information is posted.- A copy of each item described above aimed at transient populations within the plume EPZ.”]No need for this info to be included in plans or procedures. Info may change mid-year, then Plan or Procedure is ‘out-of-date’. Basis: This information now is sent with the Annual Letter of Certification and that’s where it belongs.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0109-028	Ottawa County, Ohio, Koch Beth	page II-50, lines 12-13, 15-16, 23): Copies of this information, as appropriate, should be provided to FEMA with the plans/procedures. The plans/procedures should include: A list of locations where such information is posted.A copy of each item described above aimed at transient populations within the plume EPZ.COMMENT: Materials should only be included with the Annual Letter of Certification.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0086-017	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-50, lines 17-21 anline 31: This additional detail adds little value to ORO plans/procedures, and is frequently modified. The existing mechanism through the PR-1 report or equivalent ALC process should be sufficient. The cited wording should be deleted.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.2	FEMA-2008-0022-0102-030	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-50, Lines 17-21 and Line 31: Page II-48, Line 18: This information is typically described in the annual PR-1 Report submitted for the ALC, and should not be required to be included in ORO plans/procedures. ORO plans/procedures should only describe the scope of the public information program and provide a general description of published materials. The cited wording should be deleted.Rationale: This additional detail does not enhance the value for ORO plans/procedures, and is frequently modified. The existing mechanism through the PR-1 report or equivalent ALC process should be sufficient.	Modified	The REP Program Manual language has been amended to read that public information materials should be described in the plan. Copies of these materials should be provided for review with the ALC. See the bullet list under Evaluation Criterion G.1 in Part II.C - Planning Guidance. See also Part IV.O - Annual Letter of Certification - ALC Review Guide.
Criterion G.2	FEMA-2008-0022-0086-019	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	G.2 Page II-50, line 29: Comments: This is listed as a shared responsibility among the licensee, State and local government. The lead responsibility is most likely with the licensee	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion G.3.a					
Criterion G.3.a	FEMA-2008-0022-0097-042	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. II-51COMMENT: New JIC requirements – need to flesh out. Remove list of recommended features. It includes obsolete features telephones for new media and furniture.BASIS: Guidance is too prescriptive and outdated. Joint information centers/system need to be contemporary and flexible and meet the objective of release of timely and accurate information.	Rejected	The comment is inconsistent with FEMA policy or best practices. The cited text is intended to provide guidance to OROs. Actual features will be based on local resources.
Criterion G.3.a	FEMA-2008-0022-0116-057	Nuclear Energy Institute, Alex Marion	Part II.C, G.3.a, p. II-51: New JIC requirements – need to flesh out. Remove list of recommended features. It includes obsolete features telephones for new media and furniture.Basis: Guidance is too prescriptive and outdated. Joint information centers/system need to be contemporary and flexible and meet the objective of release of timely and accurate information.	Rejected	The comment is inconsistent with FEMA policy or best practices. The cited text is intended to provide guidance to OROs. Actual features will be based on local resources.
Criterion G.3.a	FEMA-2008-0022-0110-022	Alabama Emergency Management Agency, J Frank Price	page II-51, lines 21- II-52 line 17: The requirements for a JIC and alternate JIC is include many requirements in REP that are not currently included. Many OROs have do not have such large and well equipped backup facility	Rejected	The comment is inconsistent with FEMA policy or best practices. The cited text is intended to provide guidance to OROs. Actual features will be based on local resources.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.3.a	FEMA-2008-0022-0121-014	Utility Radiological Safety Board of Ohio, Nancy Dragani	A well coordinated Joint Information Structure (JIS) to include the licensee needs to be emphasized in statements referring to multiple Joint information Centers (JICs).	Noted	FEMA does not have the authority to guide licensee activities. One primary purpose of the JIC is to facilitate coordination of all entities responsilbe for releasing information to the public.
Criterion G.3.a	FEMA-2008-0022-0121-058	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-51 Line: 40-42 Comments: It is important for the licensee to be incorporated with the ORO organizations in the JIC and that any statement from the licensee, as well as other organizations in the JIC, be coordinated through the Primary Pia in charge. This needs to be stated more clearly because some may tend to independently act without the advance coordination and this paragraph is a good place to state the need for coordinated action.	Noted	FEMA does not have the authority to guide licensee activities. One primary purpose of the JIC is to facilitate coordination of all entities responsilbe for releasing information to the public.
Criterion G.3.a	FEMA-2008-0022-0113-024	North Carolina Division of Emergency Management, Stephen Payne	Page II-51, Line 42, 44 RECOMMENDATION/COMMENT: DELETE REFERENCE TO “PRIMARY MEDIA FACILITY” – USE JOINT INFORMATION CENTER (JIC)BASIS:NIMS and the National Response Frame work refer to a JIC as the location for media information. Use of this term brings REP guidance in line with Federal guidance and plans.	Accepted	The term Joint Information Center (JIC) has been applied throughout the REP Program Manual.
Criterion G.3.b					
Criterion G.3.b	FEMA-2008-0022-0121-059	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-52 Line: 30-31 Comments: While understanding the need for a near-site area for the media, the comments presented for the previous item (II.C, 11-51,40-42) apply even more strongly here. The Primary Pia at the JIC must be the coordination point for all news releases or it defeats the purpose of having a JIC. This should be emphasized in the explanation material.	Noted	The explanation for Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion G.3.b	FEMA-2008-0022-0097-043	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-52, Lines 35-36), p. II-54 (lines 1-3): This criterion addresses the need to grant some members of the media access to the EOF for the purposes of transparency of the response efforts. Note: This criterion does not establish that the JIC shall be co-located with the EOF. In general, it is preferable to locate the main JIC outside the plume EPZ, although co-location of the JIC and the EOF may be acceptable if the preferred alternative is not feasible.COMMENT: Delete this new requirement.BASIS: Licensee response activities do not fall under the jurisdiction of FEMA.	Modified	The explanation for Evaluation Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See Evaluation Criterion G.3.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.3.b	FEMA-2008-0022-0116-058	Nuclear Energy Institute, Alex Marion	Part II.C, G.3.b, p. II-52 (lines 35-36), p. II-54 (lines 1-3): This criterion addresses the need to grant some members of the media access to the EOF for the purposes of transparency of the response efforts. Note: This criterion does not establish that the JIC shall be co-located with the EOF. In general, it is preferable to locate the main JIC outside the plume EPZ, although co-location of the JIC and the EOF may be acceptable if the preferred alternative is not feasible. Part II.C, G.3.b, p. II-52 (lines 35-36), p. II-54 (lines 1-3): Delete this new requirement. Basis: Licensee response activities do not fall under the jurisdiction of FEMA.	Modified	The explanation for Evaluation Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See Evaluation Criterion G.3.b in Part II.C - Planning Guidance.
Criterion G.3.b	FEMA-2008-0022-0113-025	North Carolina Division of Emergency Management, Stephen Payne	. Page II-52, Line 36-37 & Page II-53. Line 2-4 RECOMMENDATION/COMMENT:DELETE SECTION BASIS:This criteria is focused entirely on the licensee – explanation or other defining information should come from NRC not FEMA. Again this is a blurring of the line between the responsibilities of FEMA and NRC.	Rejected	The explanation for Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion G.4.a					
Criterion G.4.a	FEMA-2008-0022-0113-026	North Carolina Division of Emergency Management, Stephen Payne	.Page II-53, Line16-36 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING: To ensure that interaction with news media is effective, the role and function of the the spokesperson(a.k.a., public information officer (PIO), media director/coordinator, public affairs officer, spokesperson) must be defined in advance.	Noted	The existing REP Program Manual language is sufficient. The term PIO is emphasized for consistency with NIMS.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0020-021	Ashtabula County EMA, George Rolland	Page Ref. II-53 Comment: Lines 18 thru 20 establishes training requirement for PIOs that now includes the NIMS training. Potential Impact: Many locals at the current time have not had NIMS training for their EOC Staff, which includes PIOs. Comment by: Locals	Modified	REP Program Manual language has been modified to delete the phrase that the PIO should be trained "consistent with the requirements and recommendations established by the National Integration Center's Incident Management Systems Integration Division." See the Explanation section of NUREG Crtierion G.4.a in Part II.C - Planning Guidance. In addition, FEMA offers PIO training at EMI, which is cost-effective for OROs because FEMA reimburses airfare, there is no housing cost, and meals are available at a reduced cost. PIO training is also available in many States. After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion G.4.a	FEMA-2008-0022-0021-021	Geauga County DES, Dale Wedge	Page Ref. II-53 Comment: Lines 18 thru 20 establishes training requirement for PIOs that now includes the NIMS training. Potential Impact: Many locals at the current time have not had NIMS training for their EOC Staff, which includes PIOs. Comment by: Locals	Modified	REP Program Manual language has been modified to delete the phrase that the PIO should be trained "consistent with the requirements and recommendations established by the National Integration Center's Incident Management Systems Integration Division." See the Explanation section of NUREG Crtierion G.4.a in Part II.C - Planning Guidance. In addition, FEMA offers PIO training at EMI, which is cost-effective for OROs because FEMA reimburses airfare, there is no housing cost, and meals are available at a reduced cost. PIO training is also available in many States. After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0036-021	Lake County EMA, Larry Greene	Page Ref. II-53 Comment: Lines 18 thru 20 establishes training requirement for PIOs that now includes the NIMS training. Potential Impact: Many locals at the current time have not had NIMS training for their EOC Staff, which includes PIOs. Comment by: Locals	Modified	REP Program Manual language has been modified to delete the phrase that the PIO should be trained "consistent with the requirements and recommendations established by the National Integration Center's Incident Management Systems Integration Division." See the Explanation section of NUREG Crtierion G.4.a in Part II.C - Planning Guidance. In addition, FEMA offers PIO training at EMI, which is cost-effective for OROs because FEMA reimburses airfare, there is no housing cost, and meals are available at a reduced cost. PIO training is also available in many States. After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion G.4.a	FEMA-2008-0022-0108-051	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-53 Line: 18-20 Comment: What if we choose a PIO based on something other than the National Integration Center's Incident Management Systems Integration Division? Is FEMA going to start imposing requirements upon our response personnel? If the PIO "should be" trained consistent to this agency's criteria, FEMA needs to make it easily and affordably available down to the local level.	Modified	REP Program Manual language has been modified to delete the phrase that the PIO should be trained "consistent with the requirements and recommendations established by the National Integration Center's Incident Management Systems Integration Division." See the Explanation section of NUREG Crtierion G.4.a in Part II.C - Planning Guidance. In addition, FEMA offers PIO training at EMI, which is cost-effective for OROs because FEMA reimburses airfare, there is no housing cost, and meals are available at a reduced cost. PIO training is also available in many States.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0117-024	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, G.4.a, Page II-53, lines 39-46: To address these issues, OROs should establish a process to coordinate the timely sharing and release of public information with the FBI and law enforcement during an HAB event. Roles and responsibilities for release of public information in an HAB event should be defined in ORO plans and procedures (particularly between the FBI and response organizations, including the Incident Command). States with multiple NPPs may have to interact with multiple FBI field offices that may have different response times or different approaches to sensitive information. Guidelines may be needed to determine what should be withheld for security reasons and what information should be released to protect the public. EAS messages for HAB events should be developed.Comments: Procedures currently exist for the coordination of public information during law enforcement activities. explanation/RecommendatioN: The coordination of public information by law enforcement agencies is commonly practiced throughout state and federal agencies. There is no need to develop new standards or capabilities for REP specific HAB incidents.The recommended capabilities already exist. Remove this section.	Rejected	FEMA disagrees with deletion of this section. OROs need to have their own protocols, in addition to familiarity with external protocols. During an HAB incident, law enforcement becomes a primary source of information and must clear the information before it is released to the public. It has been an ongoing initiative to improve collaboration and cooperation between entities involved in incident response.
Criterion G.4.a	FEMA-2008-0022-0113-027	North Carolina Division of Emergency Management, Stephen Payne	.Page II-53, Line 31-45& Page II-54, Line 1-2 RECOMMENDATION/COMMENT: DELETE SECTION UNTIL DHS/FEMA AND DOJ/FBI COORDINATION HAS BEEN ACCOMPLISHED BASIS:While vital to the response actions during a hostile action event, this REQUIRES DHS/FEMA and DOJ/FBI coordination to address this situation in a manner that is beneficial to the State & Local PIO. The idea of “timely sharing” of information is foreign to the FBI as evidenced during the scattered participation activities of the FBI. This is especially true of Hq FBI personnel – their actions harken back to the ConEdison statement during TMI of “We will tell you what you need to know.” While security is important, keeping the general public informed to prevent panic is also important. There needs to be a SINGLE approach to this type event – NOT one devised by the individual FBI offices or regions. Creation of guidelines REQUIRES interaction of the local LE and FBI. This must be a joint activity NOT one from the top down.	Rejected	FEMA disagrees with deletion of this section. It is not FEMA's policy to dictate to OROs that only one response is acceptable. OROs should develop coordination protocols that are appropriate to local circumstances. During an HAB incident, law enforcement becomes a primary source of information and must clear the information before it is released to the public. It has been an ongoing initiative to improve collaboration and cooperation between entities involved in incident response.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0110-024	Alabama Emergency Management Agency, J Frank Price	page II-54, lines 1-34: Establishing formal control mechanisms that are consistence with ICS is already defined under ICS protocols and adding this to REP adds unnecessary information to REP plans. All REP plans should be complainant with ICS and the statement in the REP plan should reinforce it.	Noted	REP plans are in varying stages of adopting NIMS/ICS. Ultimately the goal will be for all REP plans to use NIMS/ICS. In the interim, this information is needed.
Criterion G.4.a	FEMA-2008-0022-0108-050	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-53 Line: 44 Comment: Define "may."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion G.4.a	FEMA-2008-0022-0101-044	Florida Division of Emergency Management, Michael Younger	All agencies, whether traditional or not, responding to a radiological or hostile action based event should be expected to function under a unified command (or a unified area command. if appropriate) system comprised of the various disciplines responding. These systems are designed to facilitate the vetting of sensitiveinformation prior to release. The explanation for this criterion does not offer much planning guidance but instead has several generic statements based on hypothetical situations that do nothing to clarify the suggested specific information that should be contained in the plans and procedures.	Noted	REP plans are in varying stages of NIMS/ICS compliance. Ultimately the goal will be for all REP plans to be compliant. In the interim, this information is needed.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0108-052	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-53 Line: 30-37 Comment: If "secrecy" is to be maintained, then G.3.b becomes deficient as the EOF is allow media access for "transparency" of the response? Or is media access to the EOF allowed as long as they maintain silence regarding the HAB? If not, how does FEMA which criterion can be "ignored" and "when?" If a criterion can be suspended due to certain activities, FEMA needs to make it transparent as to which ones and when. Otherwise, we have little choice in exercising them as required in a drill or real event.	Modified	The explanation for Evaluation Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See Evaluation Criterion G.3.b in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0110-023	Alabama Emergency Management Agency, J Frank Price	page II-53, lines 30-46; II 54, lines 1-34: Responsible is being assigned to the JIC and REP planners to develop procedures and coordination on handling procedures about secret information on HAB incidents. The responsible for information on HAB incident should be with the FBI or DHS and JICs should support by providing a place in the JIC or use it support operations for local LE.	Modified	The explanation for Evaluation Criterion G.3.b has been deleted because this criterion applies only to the licensee. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See Evaluation Criterion G.3.b in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0097-046	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-54, Lines2-13: COMMENT: Eliminate this paragraph and replace with “All organization should be familiar with the process for the release of public information under the incident command structure and inaccordance with the Public Information Annex to the NRF. [Note: proposed language needsadditional work and should include correct references to fed guidance documents]BASIS: There is already an ICS protocol and federal support annex covering release of public information. This is another example of creating additional layers of procedures and protocols under REP when the reference should simply be in accordance with ICS.	Rejected	FEMA recognizes that external protocols for handling sensitive information are available. FEMA recommends that OROs also have their own protocols as well as being familiar with the external protocols.
Criterion G.4.a	FEMA-2008-0022-0116-061	Nuclear Energy Institute, Alex Marion	Part II.C, G.4.a, p. II-54 (lines 2-13): Eliminate this paragraph and replace with “All organization should be familiar with the process for the release of public information under the incident command structure and in accordance with the Public Information Annex (ESF 15) to the NRF. Basis: There is already an ICS protocol and federal support annex covering release of public information. This is another example of creating additional layers of procedures and protocols under REP when the reference should simply be in accordance with ICS and federal response plan documents.	Rejected	FEMA recognizes that external protocols for handling sensitive information are available. FEMA recommends that OROs also have their own protocols as well as being familiar with the external protocols.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0097-045	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	COMMENT: Page II-53, Lines 44-46: Change wording to "OROs should be familiar with established law enforcement/security protocols for the release of sensitive, crime-related information. Remove requirement for EAS messages for HAB events.BASIS: Again, the expectation being established here is to develop new procedures and protocols under REP when these have already been established and are implemented for every crime related event. Does any given State have EAS messages for school shootings? Or othersignificant crime-related events? These should not be imposed through the REP program	Modified	FEMA recognizes that external protocols for handling sensitive information are available. FEMA recommends that OROs also have their own protocols as well as being familiar with the external protocols. The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0097-044	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II. C, Criterion G.4.a COMMENT: The discussion under the explanation pertaining to coordination of sensitive information during a hostile action based event seems out of place under this criterion. The explanation statements pertaining to inter-jurisdictional KI policies and its use during an HAB event are also out of place. ORO procedures should define roles and responsibilities in an HAB event. This is an inappropriate explanation. Remove explanation pertaining to KI; it is irrelevant here. Remove detailed guidance for coordinating sensitive information in a HAB event.BASIS: It may be more appropriate to include a more comprehensive discussion of coordination of public information for an HAB event under criterion G.4.b. It is not clear why KI use would be any different for an HAB event than for any other radiological emergency.	Modified	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0118-006	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Criterion G.4.a recommendsdevelopment of Emergency Alert System (EAS) messages for Hostile Action Based(HAB) events (line 46). We disagree that information specific to a HAB event should beincluded in an EAS message. EAS messages are used to inform the public of whatprotective actions they should take, not to provide information regarding an attack on theNPP. There is no unique information that would need to be included in an EAS messageduring a HAB event. Each HAB situation would be considered individually whenmaking the appropriate Protective Action Recommendation (PAR). The fact that theevent is HAB would not change the way we communicate Protective ActionRecommendations to the public, therefore special HAB EAS messages are not necessary.	Modified	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0109-030	Ottawa County, Ohio, Koch Beth	page II-53, lines 44-46: Guidelines may be needed to determine what should be withheld for security reasons and what information should be released to protect the public. EAS messages for HAB events should be developed.COMMENT: Pre-scripting EAS messages for HAB events is not practical. There are too many variables. HAB messages must be event specific as are most non-REP emergency messages.	Noted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0020-022	Ashtabula County EMA, George Rolland	Page Ref. II-53 Comment: Lines 44 - 46 indicates establishment of new EAS messages for HAB events. Disagree in that messages should be consistent for the event classification (UE, Alert, SAE, GE) as they are now and contain the same info as they do now with no mention of HAB. Potential Impact: EAS messages should NOT contain any info regarding HAB events. Potential to incite major panic in the public. Comment by: Locals	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0021-022	Geauga County DES, Dale Wedge	Page Ref. II-53 Comment: Lines 44 - 46 indicates establishment of new EAS messages for HAB events. Disagree in that messages should be consistent for the event classification (UE, Alert, SAE, GE) as they are now and contain the same info as they do now with no mention of HAB. Potential Impact: EAS messages should NOT contain any info regarding HAB events. Potential to incite major panic in the public. Comment by: Locals	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0036-022	Lake County EMA, Larry Greene	Page Ref. II-53 Comment: Lines 44 - 46 indicates establishment of new EAS messages for HAB events. Disagree in that messages should be consistent for the event classification (UE, Alert, SAE, GE) as they are now and contain the same info as they do now with no mention of HAB. Potential Impact: EAS messages should NOT contain any info regarding HAB events. Potential to incite major panic in the public. Comment by: Locals	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0073-018	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-53Comment: Lines 44 - 46. Criterion G.4.a. Indicates establishment of new EAS messages for HAB events. Disagree in that messages should be consistent for the event classification (UE, Alert, SAE, GE) as they are now and contain the same info as they do now with no mention of HAB. While the messages might need to be added to modify the Protective Actions made to the public; no mention about a security/hostile action incident should be made. This has been the policy of all of our LLEA's as well as the State police.Potential Impact: EAS messages should NOT contain any info regarding HAB events. Potential to incite major panic in the public. As well as providing information to the "bad guys" which may endanger law enforcement responders at the scene.	Modified	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0116-060	Nuclear Energy Institute, Alex Marion	Part II.C, G.4.a, p. II-53 (lines 44-46): Guidelines may be needed to determine what should be withheld for security reasons and what information should be released to protect the public. EAS messages for HAB events should be developed. Part II.C, G.4.a, p. II-53 (lines 44-46): Change wording to “OROs should be familiar with established law enforcement/security protocols for the release of sensitive, crime-related information. Remove requirement for EAS messages for HAB events. Basis: Again, the expectation being established here is to develop new procedures and protocols under REP when these have already been established and are implemented for every crime-related event. Does any given State have EAS messages for school shootings? Or other significant crime-related events? These should not be imposed through the REP program	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0079-011	Delaware Emergency Management Agency, James Turner	Part II Page 53 Issue: EAS message should be established to include HAB events. Basis/Comment: EAS messages must consistent for the classification of UE, Alert, SAE or GE regardless of Emergency type. EAS messages are a medium to initiate alert messages to our citizens followed by other messages identifying incident type and protective action recommendations (PARs).	Modified	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0130-013	State of Vermont, Barbara Farr	Page II-54: EAS Messages should be established to include Hostile Action Based events.Basic CommentsEAS Messages must be consistent for classification of Notification of Notification of Unusual Event, Alert, Site Area Emergency, or General Emergency regardless of the Emergency Type. EAS messages are a medium to initiate alert messages to our citizens followed by other messages and protective action recommendations. Remove “EAS messages for HAB events should be developed”.	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0128-019	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-53 (lines 2-13): All organizations should establish formal control mechanisms on the release of information ……Pre-approved generic press statements may be used to initially address media inquiries, while not identifying specifics regarding response and/or aspects of crime scene investigation.COMMENTs: There is already an ICS protocol and federal support annex covering release of public information. Explanation/recommendation :Change wording to “OROs should be familiar with established law enforcement/security protocols for the release of sensitive, crime-related information. Remove requirement for EAS messages for HAB events.	Accepted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0106-059	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-54, Line 8Comment: "EAS messages for HAB should be developed." Nebraska totally disagrees with this statement. While one or two additional Special News Broadcasts (SNB) may need to be developed, present SNB could be used as well telling the public to shelter. EAS messages should remain as they are. SNB messages discussing a Rad. Event will cause enough problems with the public without inserting additional information concerning terrorism.Potential Impact: Public Panic!	Noted	The sentence "EAS messages for HAB events should be developed." has been deleted. See the Explanation section of Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0105-007	Tennessee Emergency Management Agency, Gary Lima	EAS messaging and press releases during HAD do not go out until our TBI and FBI Emergency Services Coordinators (ESC) redact any language that would impede law enforcement response – this would be for HAD’s and a real event. This has already been exercised in Tennessee.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion G.4.a	FEMA-2008-0022-0020-024	Ashtabula County EMA, George Rolland	Page Ref. II-54 Comment: General question. Need more justification for why plans should be enhanced to address the use of KI in HAB events. Why is HAB event in this case any different than any other radiological event and/or assessment? Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0021-024	Geauga County DES, Dale Wedge	Page Ref. II-54 Comment: General question. Need more justification for why plans should be enhanced to address the use of KI in HAB events. Why is HAB event in this case any different than any other radiological event and/or assessment? Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0036-024	Lake County EMA, Larry Greene	Page Ref. II-54 Comment: General question. Need more justification for why plans should be enhanced to address the use of KI in HAB events. Why is HAB event in this case any different than any other radiological event and/or assessment? Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0020-023	Ashtabula County EMA, George Rolland	Page Ref. II-54 Comment: Line 15 suggests 'enhancements to public information plans for HAB events should also address the use of KI." Disagree: KI should be part of a PAR only and based on plant conditions & circumstances, same as exists now. Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0021-023	Geauga County DES, Dale Wedge	Page Ref. II-54 Comment: Line 15 suggests 'enhancements to public information plans for HAB events should also address the use of KI." Disagree: KI should be part of a PAR only and based on plant conditions & circumstances, same as exists now. Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0036-023	Lake County EMA, Larry Greene	Page Ref. II-54 Comment: Line 15 suggests 'enhancements to public information plans for HAB events should also address the use of KI." Disagree: KI should be part of a PAR only and based on plant conditions & circumstances, same as exists now. Comment by: Locals	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0079-012	Delaware Emergency Management Agency, James Turner	Part II Page 54 Issue: KI procedures should be enhanced to address the use of KI in a HAB event. Basis/Comment: KI should be part of a PAR only based on plant conditions and circumstances which are implemented by the AHJ following a review of the hazard, proposed protective action decision (PAD) and approved as a PAR.	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0116-059	Nuclear Energy Institute, Alex Marion	Part II. C, Criterion G.4.a – Each principal organization shall designate a spokesperson Part II. C, Criterion G.4.a – The discussion under the explanation pertaining to coordination of sensitive information during a hostile action based event seems out of place under this criterion. The explanation statements pertaining to inter-jurisdictional KI policies and its use during an HAB event are also out of place. ORO procedures should define roles and responsibilities in an HAB event. This is an inappropriate explanation. Remove explanation pertaining to KI; it is irrelevant here. Remove detailed guidance for coordinating sensitive information in a HAB event.Basis: It may be more appropriate to include a more comprehensive discussion of coordination of public information for an HAB event under criterion G.4.b. It is not clear why KI use would be any different for an HAB event than for any other radiological emergency.	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.a	FEMA-2008-0022-0130-014	State of Vermont, Barbara Farr	II-54: KI procedures should be enhanced to address the use of KI in Hostile Action Based events.Basic CommentsKI should be part of a protective action recommendation and after review of the appropriate agencies and review of hazard and proposed protective actions (PAD's).	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.a	FEMA-2008-0022-0109-029	Ottawa County, Ohio, Koch Beth	page II-54, line 15: Enhancements to public information plans for HAB events should also address the use of KI.COMMENT: The use of KI is based on a number of variables but primarily on the type of release. HAB needs no special KI reference.	Modified	The text in G.4.a addressing the use of KI in an HAB incident has been deleted. See the Explanation section in Evaluation Criterion G.4.a in Part II.C - Planning Guidance.
Criterion G.4.b					
Criterion G.4.b	FEMA-2008-0022-0097-079	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	PartII.G4b COMMENT: Replace “joint facility” with JICBASIS: Omission of the widely accepted and recommended Joint Information Center (JIC) is blatantly missing. Instead “joint facility” is used. Terminology should mirror NIMS.	Accepted	The term Joint Information Center (JIC) has been applied throughout the REP Program Manual.
Criterion G.4.b	FEMA-2008-0022-0116-089	Nuclear Energy Institute, Alex Marion	Part II.G.4.b: Replace “joint facility” with JIC Basis: Omission of the widely accepted and recommended Joint Information Center (JIC) is blatantly missing. Instead “joint facility” is used. Terminology should mirror NIMS.	Accepted	The term Joint Information Center (JIC) has been applied throughout the REP Program Manual.
Criterion G.4.b	FEMA-2008-0022-0101-045	Florida Division of Emergency Management, Michael Younger	Page II-55, lines 25-26 and 28- 29 The term “joint facility” should be replaced with “joint information center” to be reflective of NIMS terminology.	Accepted	The term Joint Information Center (JIC) has been applied throughout the REP Program Manual.
Criterion G.4.b	FEMA-2008-0022-0097-047	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-55, Lines 9-15: COMMENT: Delete lines 9-15.BASIS: Does not pertain to REP; duplicate of guidance in other federal response documents that are already referenced.	Rejected	The comment is inconsistent with FEMA policy and best practices for any emergency situation. Guidance in the REP Program Manual is drawn from many other Federal documents. The cited text provides relevant guidance on the JIS as a part of all-hazards emergency management. The term JIS has been added to the REP Program Manual glossary.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.b	FEMA-2008-0022-0116-062	Nuclear Energy Institute, Alex Marion	Part II.C, G.4.b, p. II-55 (lines 9-15): A Joint Information System (JIS) is an effective tool to achieve these goals. A JIS is designed to provide the necessary structure and mechanisms for organizing, developing, integrating, and delivering coordinated interagency messages; developing, recommending, and executing public information plans and strategies…… Part II.C, G.4.b, p. II-55 (lines 9-15): Delete lines 9-15.Basis: Does not pertain to REP; duplicate of guidance in other federal response documents that are already referenced.	Rejected	Guidance in the REP Program Manual is drawn from many other Federal documents. The term JIS has been added to the REP Program Manual glossary.
Criterion G.4.c					
Criterion G.4.c	FEMA-2008-0022-0087-012	South Carolina Emergency Management Division, Danny Loomis	Page II-56 (GA.c): How will Rumor Control deal with web-based media? I think this needs to be addressed in the OROs plans. NOTE: How would it be evaluated if added??? The Twitter issue alone is something of concern.	Noted	OROs are responsible for the accuracy of information they give out. The particular information venue is not being evaluated. Rumor control procedures are the same for all media.
Criterion G.4.c	FEMA-2008-0022-0101-046	Florida Division of Emergency Management, Michael Younger	Page II-56, line 4 Additionally, this criterion addresses rumor control. If FEMA's intent is to include the capability to have direct access to a knowledgeable official information source to respond to public inquiries under this criterion, then this should be clearly stated.	Noted	The PIO is the official source. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.
Criterion G.4.c	FEMA-2008-0022-0101-047	Florida Division of Emergency Management, Michael Younger	Page II-56, line 17 The word "shall" needs to be changed to "should" to be consistent with the rest of the document's planning guidance.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.c	FEMA-2008-0022-0110-025	Alabama Emergency Management Agency, J Frank Price	page II-56, line 17: the word “shall” has legal meaning and this should be “should”.	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion G.4.c	FEMA-2008-0022-0110-026	Alabama Emergency Management Agency, J Frank Price	page II-56, lines 17-41: The Social media Blogs and undermine types of information is a board area. The plan can refer to such but should not need to makes plans for it	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA does utilize Twitter. FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.
Criterion G.4.c	FEMA-2008-0022-0108-054	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-56 Line: 20-21 Comment: Has FEMA reviewed the possibility that internet-based forums may lead to rampant rumors?	Noted	FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.c	FEMA-2008-0022-0108-055	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-56 Line: 20-22,36-41 Comment: What is FEMA's view on Twitter?	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA does utilize Twitter. FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.
Criterion G.4.c	FEMA-2008-0022-0036-026	Lake County EMA, Larry Greene	Page Ref. II-56 Comment: Line 21 mentions blogs, which is new. Media Monitoring personnel at JICs should be aware of this mechanism.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.
Criterion G.4.c	FEMA-2008-0022-0020-026	Ashtabula County EMA, George Rolland	Page Ref. II-56 Comment: Line 21 mentions blogs, which is new. Media Monitoring personnel at JICs should be aware of this mechanism.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.
Criterion G.4.c	FEMA-2008-0022-0021-026	Geauga County DES, Dale Wedge	Page Ref. II-56 Comment: Line 21 mentions blogs, which is new. Media Monitoring personnel at JICs should be aware of this mechanism.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA maintains a forward-leaning posture with respect to new media forums. OROs are responsible for the accuracy of the information they disseminate, but FEMA recognizes that it is not possible to control or monitor all information venues. OROs are encouraged to monitor electronic social media information venues to the extent possible. The same rumor control procedures should be used for all venues that are monitored.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.c	FEMA-2008-0022-0113-028	North Carolina Division of Emergency Management, Stephen Payne	:Page II-56, Line 22RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Procedures for responding to public inquiries should address the following:”BASIS:As written the level of detail indicated here is too much for a plan. It robs the plan of flexibility. It is good guidance for procedures i.e. SOP/SOG documents, to address.	Noted	The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.
Criterion G.4.c	FEMA-2008-0022-0108-053	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-56 Line: 23 Comment: "Website" should be "web site." No capitalization is needed.	Modified	The REP Program Manual has been amended to use "website" throughout.
Criterion G.4.c	FEMA-2008-0022-0020-002	Ashtabula County EMA, George Rolland	Blanket comment - word search 'pubic' - found 2 times in document	Accepted	The REP Program Manual has been amended as suggested. The typo has been corrected in Part II.C - Planning Guidance, Evaluation Criterion G.4.c and Part IV.N - Public Information Guide and Process.
Criterion G.4.c	FEMA-2008-0022-0020-025	Ashtabula County EMA, George Rolland	Page Ref. II-56 Comment: Line 30 - change the word pubic to public	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion G.4.c in Part II.C - Planning Guidance.
Criterion G.4.c	FEMA-2008-0022-0021-002	Geauga County DES, Dale Wedge	Blanket comment - word search 'pubic' - found 2 times in document	Accepted	The REP Program Manual has been amended as suggested. The typo has been corrected in Part II.C - Planning Guidance, Evaluation Criterion G.4.c and Part IV.N - Public Information Guide and Process.
Criterion G.4.c	FEMA-2008-0022-0021-025	Geauga County DES, Dale Wedge	Page Ref. II-56 Comment: Line 30 - change the word pubic to public	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion G.4.c in Part II.C - Planning Guidance.
Criterion G.4.c	FEMA-2008-0022-0036-002	Lake County EMA, Larry Greene	Blanket comment - word search 'pubic' - found 2 times in document	Accepted	The REP Program Manual has been amended as suggested. The typo has been corrected in Part II.C - Planning Guidance, Evaluation Criterion G.4.c and Part IV.N - Public Information Guide and Process.
Criterion G.4.c	FEMA-2008-0022-0036-025	Lake County EMA, Larry Greene	Page Ref. II-56 Comment: Line 30 - change the word pubic to public	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion G.4.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.c	FEMA-2008-0022-0101-048	Florida Division of Emergency Management, Michael Younger	Page II-56, line 30 Correct spelling of the word “public”	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion G.4.c in Part II.C - Planning Guidance.
Criterion G.4.c	FEMA-2008-0022-0101-049	Florida Division of Emergency Management, Michael Younger	Page II-56, lines 33-34 Use of the word “effectively” established a rather ambiguous performance expectation level potentially subject to varying degrees of interpretation across the FEMA regions. This is a very difficult determination to make during exercises. Consideration should be given to allowing exercise credit for this criterion for real world events.	Noted	Effectiveness is explained in the first paragraph of the explanation for Criterion G.4.c in the REP Program Manual. Refer to Exhibit III-2 for criteria that may receive exercise credit for real world events.
Criterion G.4.c	FEMA-2008-0022-0116-063	Nuclear Energy Institute, Alex Marion	Part II.C, G.4.c, p. II-56 (lines 33-35): Remove the word “effectively” Basis: Measure of effectiveness cannot be determined in a simulated drill demonstration and in a real event, how can effectively monitored be determined? Unrealistic expectation under REP when real media coverage of day to day events always contain a level of ambiguity and less than accurate information that is corrected as the event progresses.	Noted	Effectiveness is explained in the first paragraph of the explanation for Criterion G.4.c in the REP Program Manual. Refer to Exhibit III-2 for criteria that may receive exercise credit for real world events.
Criterion G.4.c	FEMA-2008-0022-0101-050	Florida Division of Emergency Management, Michael Younger	Page II-56, lines 36-41 This is an ever evolving area that is both very large in scope and not easily defined as technology changes. Clarification needs to be made as to what the intent of internet and social media monitoring entails. Monitoring of mainstream, credible open source media, regardless of format, does not present the inherent challenge that monitoring social media does. With an abundance of such outlets, OROs with limited staffing or technology may have difficulties monitoring such a broad area.	Noted	Effectiveness is explained in the first paragraph of the explanation for Criterion G.4.c in the REP Program Manual. Refer to Exhibit III-2 for criteria that may receive exercise credit for real world events.
Criterion G.4.c	FEMA-2008-0022-0097-049	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-57, Line 1:COMMENT: Retain original language in the 2002 draft: PIO to be “alert” for patterns, trends, etc. v. “analysis”. No guidelines for analysis of trends provided.BASIS: Unrealistic expectation imposed upon REP program.	Rejected	The current language correctly conveys FEMA's intent. Identifying trends and analyzing the information the public is receiving is the responsibility of the PIO. The PIO is responsible for correcting any misinformation the public receives. EMI offers basic and advanced PIO training.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.4.c	FEMA-2008-0022-0116-064	Nuclear Energy Institute, Alex Marion	Part II.C, G.4.c, p. II-57 (line 1): - The method for the PIO to ensure the analysis of any patterns or trends reported by the public inquiry staff. Part II.C, G.4.c, p. II-57 (line 1): Retain original language in the 2002 draft: PIO to be “alert” for patterns, trends, etc. v. “analysis”. No guidelines for analysis of trends provided. Basis: Unrealistic expectation imposed upon REP program.	Rejected	The current language correctly conveys FEMA's intent. Identifying trends and analyzing the information the public is receiving is the responsibility of the PIO. The PIO is responsible for correcting any misinformation the public receives. EMI offers basic and advanced PIO training.
Criterion G.4.c	FEMA-2008-0022-0121-060	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-57 Line: 1 thru 6 Comments: This is completely unnecessary. This level of detail should not be contained in this document. It is unnecessary to specify a method in any plan.	Modified	The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO. See Appendix B - Glossary of REP Terms.
Criterion G.4.c	FEMA-2008-0022-0097-048	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page II-57, Line 16: COMMENT: Remove the word “effectively”BASIS: Measure of effectiveness can not be determined in a simulated drill demonstration and in a real event, how can effectively monitored be determined? Unrealistic expectation under REP when real media coverage of day to day events always contain a level of ambiguity and less than accurate information that is corrected as the event progresses.	Rejected	Effectiveness is explained in the first paragraph of the explanation for Criterion G.4.c in the REP Program Manual. Refer to Exhibit III-2 for criteria that may receive exercise credit for real world events.
Criterion G.5					
Criterion G.5	FEMA-2008-0022-0121-061	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-57 Line: 27 Comments: States ORO's must do coordinated annual training to acquaint local media w/ emergency plan, information about radiation and points of contact for release of public information during an emergency. Will FEMA/NRC do the same w/ national media outlets?	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. This criterion is intended to assure that media serving EPZ communities have information specific to emergency plans for that site.
Criterion G.5	FEMA-2008-0022-0113-029	North Carolina Division of Emergency Management, Stephen Payne	.Page II-57, Line 39-41RECOMMENDATION/COMMENT: DELETE SENTENCEBASIS:This is an editorial commentary – while good, it is not needed in a guidance document.	Rejected	The cited text is part of a discussion about why media briefings are important and is an example of a best practice.
Criterion G.5	FEMA-2008-0022-0108-056	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-57 Line: 40 Comment: It is often difficult to get media to attend an annual briefing. If FEMA is not going to accept the provision for an annual briefing when there are no attendees, then the information in this criterion needs to reflect that.	Accepted	According to the Annual Letter of Certification checklist, in instances of poor attendance, in lieu of a meeting, a statement that program materials covering requisite topics were mailed to media representatives must be provided. Corresponding language has been added to the explanation for Criterion G.5. See the Explanation section of Evaluation Criterion G.5 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion G.5	FEMA-2008-0022-0108-057	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-58 Line: 8-15 Comment: If the EPZ is in two states, does each State plan need to note "the differences between such policies and procedures across jurisdictions," when the States' philosophy differs? Or can each State plan ignore the fact that other parts of their EPZ apply KI policies differently?	Noted	States are encouraged to coordinate as much as possible, but they are not required to adopt the same policy as the other State.
Planning Standard H					
Criterion H.3					
Criterion H.3	FEMA-2008-0022-0095-030	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-59, lines 30-32, due to open records laws which vary in each state, actual facility layouts and phone numbers may not be appropriate in plans.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0098-029	Kansas Department of Health and Environment, Thomas Conley	Page II-59, lines 30-32, due to open records laws which vary in each state, actual facility layouts and phone numbers may not be appropriate in plans.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0121-020	Utility Radiological Safety Board of Ohio, Nancy Dragani	Guidance needs to address security concerns regarding making the plan available to the public.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. OROs determine which portions of their plans/procedures may be available to the public and which should be safeguarded. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0086-020	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	H.3 Page II-59, line 30: Comments: An EOC layout diagram is highly sensitive information and should not be required. Instead, a general text description of EOC size and capabilities should be sufficient.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.3	FEMA-2008-0022-0101-051	Florida Division of Emergency Management, Michael Younger	Page II-59, lines 30-31 Due to various public records laws, facility layouts, phone numbers and other sensitive information may not be appropriate in an ORO's plans or procedures.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0113-030	North Carolina Division of Emergency Management, Stephen Payne	).Page II-59, Line 30-32 RECOMMENDATION/COMMENT: DELETE SENTENCEBASIS:Information listed here provides security related information and should be REFERENCED in the plan, but maintained separately. Providing location information and site diagrams, provides vital information that can be used to disrupt or destroy this location.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0113-031	North Carolina Division of Emergency Management, Stephen Payne	.Page II-60, Line 1-2RECOMMENDATION/COMMENT: DELETE SENTENCEBASIS:The existence on an alternate EOC can be acknowledged, but further information should only be referenced. Information listed here provides security related information and should be REFERENCED in the plan, but maintained separately. Providing location information and site diagrams, provides vital information that can be used to disrupt or destroy this location.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.3	FEMA-2008-0022-0113-032	North Carolina Division of Emergency Management, Stephen Payne	.Page II-60, Line 6 – 13 RECOMMENDATION/COMMENT:DELETE REQUIREMENTBASIS:Information listed here provides security related information and should be REFERENCED in the plan, but maintained separately. Providing location information and site diagrams, provides vital information that can be used to disrupt or destroy this location.	Modified	The REP Program Manual has been amended to read that plans/procedures should "include or reference…" The REP Program Manual is not suggesting that safeguarded information should be included in documents that may be available to unauthorized individuals. See the Explanation section of Evaluation Criterion H.3 in Part II.C - Planning Guidance.
Criterion H.4					
Criterion H.4	FEMA-2008-0022-0108-060	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-60 Line: 29-41 Comment: Isn't some of this covered by D.4 and E.2? Perhaps the explanation should reference other criterion.	Noted	This criterion refers to what level of mobilization is necessary to declare the facility operational. D.4 refers to who will be mobilized at what ECL; E.2 refers to how that mobilization is carried out.
Criterion H.4	FEMA-2008-0022-0095-031	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-60, line 30, states that plans and procedures should describe timely activation and staffing of ICPs. How can that describe a timely activation of an ICP? The staffing is up to the incident commander and may differ depending on the person leading that effort. ICP should be eliminated from this criterion.	Modified	What is "timely" depends on the situation. The examples have been deleted from the text. See the Appendix B - Glossary of REP Terms for the definition of "timely."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.4	FEMA-2008-0022-0098-030	Kansas Department of Health and Environment, Thomas Conley	Page II-60, line 30, states that plans and procedures should describe timely activation and staffing of ICPs. How can that describe a timely activation of an ICP? The staffing is up to the incident commander and may differ depending on the person leading that effort. ICP should be eliminated from this criterion.	Modified	What is "timely" depends on the situation. The examples have been deleted from the text. See the Appendix B - Glossary of REP Terms for the definition of "timely."
Criterion H.4	FEMA-2008-0022-0121-062	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-60 Line: 38-40 Comments: Rosters of key personnel, staff members, etc. is burdensome and unnecessary. Only position titles are needed.	Modified	The REP Program Manual has been amended to read "rosters of key positions." The rosters refer to positions or contacts, not necessarily individuals' names. The protocol could be to notify a support agency, and that agency would activate the individuals. See the Explanation section of Evaluation Criterion H.4 in Part II.C - Planning Guidance.
Criterion H.4	FEMA-2008-0022-0101-052	Florida Division of Emergency Management, Michael Younger	Page II-60, lines 38-40 Rosters may not be practical for agencies that rely on volunteer or National Guard support to activate and staff facilities as personnel availability may vary from incident to incident.	Modified	The REP Program Manual has been amended to read "rosters of key positions." The rosters refer to positions or contacts, not necessarily individuals' names. The protocol could be to notify a support agency, and that agency would activate the individuals. See the Explanation section of Evaluation Criterion H.4 in Part II.C - Planning Guidance.
Criterion H.4	FEMA-2008-0022-0116-033	Nuclear Energy Institute, Alex Marion	maintenance of duty rosters is an unrealistic expectation where, in the case of LLEA, rosters of personnel are considered proprietary.	Modified	The REP Program Manual has been amended to read "rosters of key positions." The rosters refer to positions or contacts, not necessarily individuals' names. The protocol could be to notify a support agency, and that agency would activate the individuals. Verification of rosters of individuals may be conducted during plan reviews or exercises, SAVs, or drills. REP Program Manual language modified. See the Explanation section of Evaluation Criterion H.4 in Part II.C - Planning Guidance.
Criterion H.4	FEMA-2008-0022-0111-016	Illinois Emergency Management Agency, Andrew Velasquez	Page II-6l there is more detail than is needed, i.e., rosters of key personnel do not belong in this procedure. In addition; the need to include the number of personnel to support operations in each role or position. This is scenario dependent.	Modified	The REP Program Manual has been amended to read "rosters of key positions." The rosters refer to positions or contacts, not necessarily individuals' names. The protocol could be to notify a support agency, and that agency would activate the individuals. Verification of rosters of individuals may be conducted during plan reviews or exercises, SAVs, or drills. REP Program Manual language modified. See the Explanation section of Evaluation Criterion H.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.7					
Criterion H.7	FEMA-2008-0022-0073-019	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-62Comment: Criterion H.7. 1. WDOH makes provision for near-site radiological detection and air sampling equipment for internal use by WDOH Field Teams. Other entities (counties, other state agencies or municipal first response agencies) are responsible for procuring, maintaining and calibration of any radiation detection equipment they may possess. WDOH will assist other agencies in obtaining emergency worker Thermo-luminescent dosimeters (TLD), but is not responsible for the distribution or collection of other county or state agency TLD's. Potential Impact: Regarding Comment 1: This is stated to prevent any confusion in assigning radiation detection equipment/dosimeters responsibilities during this review process.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion H.7	FEMA-2008-0022-0086-021	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	H. 7 Page II, line 19 and line 28: Comments: At-risk counties do not anticipate storing equipment near licensee facility unless required by the host county. The language does not reflect current practices or anticipated actions. This requirement is not needed and should be deleted.	Rejected	The criterion specifies "where appropriate." The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended. However, the commenter should note that the criterion provides flexibility by indicating "where appropriate."
Criterion H.7	FEMA-2008-0022-0073-076	Washington Military Department Emergency Management Division, Jim Mullen	2. There are permanent air sampling stations on the Hanford Site. While useful in providing baseline information, they are not situated or designed for use during a REP response for the Columbia Generating Station.Potential Impact Regarding Comment 2: Again a clarification statement regarding permanent air sampling stations.	Noted	REP Program Manual explanation is clear. ORO-owned or -operated equipment should be identified.
Criterion H.7	FEMA-2008-0022-0113-033	North Carolina Division of Emergency Management, Stephen Payne	.Page II-62, Line 27-30RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:Plans should reference procedure documents i.e. SOP/SOG documents for information on the following:s Radiological monitoring equipment, by type and number, that is located or stored near the nuclear facility or that will be brought in by the State, local, or tribal government.Fixed radiological monitoring stations near the nuclear facility. BASIS:As written the level of detail indicated here is too much for a plan. It robs the plan of flexibility. It is good guidance for procedures i.e. SOP/SOG documents, to address.	Rejected	The comment is inconsistent with FEMA policy or best practices. The REP Program Manual guidance in Part II refers to "plans/procedures" specifically to allow for flexibility regarding whether procedures are incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.7	FEMA-2008-0022-0121-063	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-62 Line: 28-29 Comments: It is unnecessary to require the distribution of rad equipment be tracked in a procedure or plan. It is placed/listed in a database but describing this in a plan or procedure is too cumbersome.	Noted	The plans/procedures may reference the location of the inventory data. The data should be available during plan reviews to ensure that quantities are adequate for the response outlined in the plans/procedures.
Criterion H.7	FEMA-2008-0022-0113-035	North Carolina Division of Emergency Management, Stephen Payne	Page II-63, Footnote RECOMMENDATION/COMMENT: ADD FOOTNOTE AS FOLLOWS:XX“Self-reading dosimeters” are now referred to as “direct-reading dosimeters (DRDs).”	Accepted	The REP Program Manual has been modified as suggested. See Evaluation Criterion K.3.a in Part II.C - Planning Guidance for the modification.
Criterion H.7	FEMA-2008-0022-0108-059	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-63 Comment: In H.11, we have provided kit inventories which provides much of the inventory requirements in H.10. For available items, will the kit inventories suffice to address H.10 or will the information need to be compiled and put in as separate content? Or will this be decided by the regions?	Noted	No. H.10 includes additional detail that is not provided in H.11. Yes, separate content is needed. No, the REP Program Manual is clear.
Criterion H.7	FEMA-2008-0022-0121-064	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-63 Line: Comments: H.10 - General comment - The technical requirements of this section are FAR too specific and unnecessarily limit the ability of off site agencies to make changes to plans/procedures.	Noted	The plans/procedures may reference the location of the inventory data. The data should be available during plan reviews to ensure that quantities are adequate for the response outlined in the plans/procedures.
Criterion H.10					
Criterion H.10	FEMA-2008-0022-0073-020	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-63Comment: Criterion H.10. NUREG-0654 requires the use of Direct Reading Dosimeters for Emergency Workers. FEMA has an obligation to abide by the requirements set forth in NUREG-0654. While some entities have more funding and can afford Electronic Personal Dosimeters (EPDs), not all entities can afford such equipment. It also should be noted that while Field Teams should (if possible) be equipped with EPD's, it is not necessary for ALL EW's to be equipped with EPD's.Potential Impact: DHSI FEMA needs to be aware of what kinds of dosimeter are appropriate based on the EW duty position, and not impose an unnecessary expense based on advances in dosimeter technology. DRD's meet the intent of the NUREG.Comment By: State Department of Health.	Noted	The REP Program Manual language does not require that OROs use electronic DRDs exclusively. Electronic DRD are included as an option for providing the ability to read both high- and low-range exposures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.10	FEMA-2008-0022-0086-023	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Revised explanation under H.10 to ensure sufficient equipment for supplemental workers. The language used is too prescriptive and rather should be to provide assurance of sufficient additional quantities of KI/dosimetry without being too prescriptive on exact numbers. Additional sources and distribution means should be considered and factored into HAB event planning.	Noted	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion H.10	FEMA-2008-0022-0113-034	North Carolina Division of Emergency Management, Stephen Payne	Page II-63, Line 37-39 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:Dosimetry. Dosimeters are available in two basic types: permanent record dosimeter (PRD) (e.g., film badges or Thermoluminescent Dosimeters [TLDs]) and direct reading dosimeter (DRD) xx . . . BASIS: Rewording uses more accurate descriptions and abbreviations for the two types of dosimetry.	Modified	The REP Program Manual has been modified with language similar to that suggested. See the Dosimetry subsection within the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance.
Criterion H.10	FEMA-2008-0022-0113-037	North Carolina Division of Emergency Management, Stephen Payne	Page II-64, Line 14 RECOMMENDATION/COMMENT: DELETE FOLLOWING:“e.g. film badges or Termoluniescent Dosimeters (TLDs)”	Accepted	The cited text has been moved as suggested. See Dosimetry subsection with the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance.
Criterion H.10	FEMA-2008-0022-0095-032	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-64, line 24-25, indicates the date of the last operational check and the next calibration should be on an instrument label. Many manufacturers do not require calibrations but only a functional test with a source before use, as FEMA requires. This line should say that calibration shall be at intervals recommended by the supplier of the equipment.	Accepted	The cited text is specific to portal monitors and does not require calibration before each use. The REP Program Manual has been modifed to read "Calibration is at intervals recommended by the manufacturer of the equipment." See Portal Monitors subsection with the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance.
Criterion H.10	FEMA-2008-0022-0098-031	Kansas Department of Health and Environment, Thomas Conley	Page II-64, line 24-25, indicates the date of the last operational check and the next calibration should be on an instrument label. Many manufacturers do not require calibrations but only a functional test with a source before use, as FEMA requires. This line should say that calibration shall be at intervals recommended by the supplier of the equipment.	Accepted	The cited text is specific to portal monitors and does not require calibration before each use. The REP Program Manual has been modifed to read "Calibration is at intervals recommended by the manufacturer of the equipment." See Portal Monitors subsection with the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance.
Criterion H.10	FEMA-2008-0022-0121-065	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-65 Line: 5 thru 10 Comments: It is unnecessary to require inventory and calibration information for back-up labs. More importantly, this would be an undue burden on the state and counties which would require more staff to meet these requirements.	Noted	The information on backup laboratories may be summarized.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion H.12					
Criterion H.12	FEMA-2008-0022-0116-065	Nuclear Energy Institute, Alex Marion	Part II.C, H.12, p.66, (line 16): The term “near-site” EOF has been removed from the regulation yet retained here. Part II.C, H.12, p.66, (line 16): Revise to reflect the current regulations (i.e., delete “near site” Basis: The term “near-site” EOF has been removed from the regulation yet retained here.	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion H.12	FEMA-2008-0022-0097-050	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 66, Line16:COMMENT: Revise to reflect the current regulations (i.e., delete “near site”BASIS: The term “near-site” EOF has been removed from the regulation yet retained here.	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion H.12	FEMA-2008-0022-0128-020	San Luis Obispo County Office of Emergency Services , Ron Alsop	page 66, line 16 The term “near-site” EOF.COMMENTs: The term “near-site” EOF has been removed from the regulation yet retained here.Explanation/recommendation: Revise to reflect the current regulations (i.e., delete “near site”	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion H.12	FEMA-2008-0022-0110-027	Alabama Emergency Management Agency, J Frank Price	page II-66, lines 16-19 and II-69, line 16: EOFs now can be located several hundred miles away the central point should be near the plant	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard I					
Criterion I.4 (licensee only)					
Criterion I.4 (licensee only)	FEMA-2008-0022-0108-061	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-69 Line: 6-7 Comment: "…readings and onsite and offsite exposures and contamination…" Should read "...readings, onsite and offsite exposures, and contamination…"	Noted	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion I.5 (licensee only)					
Criterion I.5 (licensee only)	FEMA-2008-0022-0097-051	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 69, Line 16:COMMENT: Revise to reflect the current regulations (i.e., delete “near site”	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion I.5 (licensee only)	FEMA-2008-0022-0108-062	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-69 Line: 16 Comment: "…information by at least the near-site…" Should read "…information by, at least, the near-site…"	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion I.5 (licensee only)	FEMA-2008-0022-0109-031	Ottawa County, Ohio, Koch Beth	page II-69, line 16:COMMENT: Remove “near site” to reflect current regulations.	Accepted	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.5 (licensee only)	FEMA-2008-0022-0108-062	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-69 Line: 16 Comment: "…information by at least the near-site…" Should read "…information by, at least, the near-site…"	Rejected	The REP Program Manual has been amended throughout the document to remove the term "near-site" for consistency with the NRC. However, note that changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion I.8					
Criterion I.8	FEMA-2008-0022-0113-038	North Carolina Division of Emergency Management, Stephen Payne	Page II-70, Line 39-40 & Page II-71, Line 1RECOMMENDATION/COMMENT: DELETE FOLLOWING:“. . . and individual(s), by title and/or position,. . . . . Plans/procedures should also specify the designated ECL at which the FMTs will be mobilized or deployed.”BASIS:This requirement goes beyond the information needed to insure an organization can accomplish it’s mission. Specification of the ECL for FMT deployment should at best be in an SOG to permit maximum flexibility for mobilization/deployment actions.	Rejected	The comment is inconsistent with FEMA policy or best practices. The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.
Criterion I.8	FEMA-2008-0022-0111-017	Illinois Emergency Management Agency, Andrew Velasquez	page II-70 through II-75. This section is a prime example of FEMA trying to vastly increase the scope and intent ofNUREG-0654/FEMA-REP-I, Rev.I criterion. It is not merely the length of the explanation (over 5 pages), but the level of detail that is of grave concern. The length of FEMA's assessment criteria for State and local governments is far in excess of what the NRC has promulgated for licensees. For example, sub-item #2, Field Team Composition, implies a specific level of expertise required for field team members. The intent ofNUREG-0654/FEMA-REP-I, Rev.I criterion could be met using properly trainednon-technical personnel. Likewise the proposed criterion for field team equipment and procedures (sub-item #7 & sub-item #8) go far beyond the requirement of I.8 in that there be appropriate monitoring equipment and methods to assess the release. In sub-item #9, the "chain-of-custody form" is listed as a procedure requirement. It should be Noted that criterion I.8 does not even dispute the desirability of such capabilities, but how such issues are addressed should be at the discretion of the responsible Off-Site Response Organization (ORO). The lack of such a procedure does not suggest an emergency response plan cannot provide reasonable assurance of public protection.	Noted	FEMA acknowledges what the commenter wrote. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The REP Program Manual guidance in Criterion I.8 is derived from other applicable Federal guidance documents. More detailed guidance is appropriate in technical subject areas.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.8	FEMA-2008-0022-0108-063	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-71 Line: 1-2 Comment: Shouldn't the ECL at which members are deployed (any ORO member) be described in more flexible terms? For example, during an HAB, perhaps FMTs won't be deployed until the area is secured, or GE instead what might be considered normal deployment at SAE.	Noted	Deployment will be based on the OROs plans/procedures.
Criterion I.8	FEMA-2008-0022-0121-066	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-71 Line: 4 thru 10 Comments: Procedures and plans should not be required to include a list of personnel (including alternates).	Noted	Lists of personnel may be by title/position in order to document a process. Individuals' names do not need to be included in the plans/procedures, as long as the location of the actual list is referenced, e.g., a list kept at the EOC.
Criterion I.8	FEMA-2008-0022-0113-039	North Carolina Division of Emergency Management, Stephen Payne	Page II-71, Line 6-7 RECOMMENDATION/COMMENT: DELETE FOLLOWING:“, and a list of personnel, including alternates, to be contacted”BASIS:This requirement goes beyond the information needed to insure an organization can accomplish an emergency recall of personnel. Placing such information in a plan robs the plan of the flexibility necessary to responded to a range of events.	Modified	The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO. Lists of personnel may be by title/position in order to document a process. Individuals' names do not need to be included in the plans/procedures, as long as the location of the actual list is referenced, e.g., a list kept at the EOC. See Appendix B - Glossary of REP Terms for the definition of "plans/procedures."
Criterion I.8	FEMA-2008-0022-0121-067	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-71 Line: 8 and 9 Comments: This requirement is an unnecessary burden on state and local governments with no significant increase in benefits.	Noted	Lists of personnel may be by title/position in order to document a process. Individuals' names do not need to be included in the plans/procedures, as long as the location of the actual list is referenced, e.g., a list kept at the EOC.
Criterion I.8	FEMA-2008-0022-0108-064	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-71 Line: 11-14 Comment: Is a "trained field team member" sufficient for a description? Or does FEMA expect field teams to be trained as specifically "health physics" type personnel?	Noted	Qualification is determined by the ORO. See Criterion O.4.
Criterion I.8	FEMA-2008-0022-0081-003	Georgia Environmental Protection Division, Jim Hardeman	These items, plus references to "two or more" on page II-71 line 12 and page III-58 line 10 refer to the number of field monitoring teams (FMTs) to be utilized by OROs to characterize a plume of radioactive material and/or deposited radioactive materials.While having the ability to deploy multiple FMTs is helpful in rapidly and accurately characterizing a plume of radioactive materials and/or deposited radioactive materials, it is not clear than multiple teams are required to demonstrate a capability to conduct field monitoring activities.	Noted	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.8	FEMA-2008-0022-0113-040	North Carolina Division of Emergency Management, Stephen Payne	Page II-71, Line 21 RECOMMENDATION/COMMENT:DELETE FOLOWING:“vehicles” RETURN TO ORIGINAL WORDING OF “resources”BASIS:Using the word “vehicles” gives the connotation of cars especially when the previous sentence referred to “four-wheeled vehicles”.	Modified	"Vehicles" has been replaced with "means of transportation." See the Transportation subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.8	FEMA-2008-0022-0108-065	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-71 Line: 25-26 Comment: For an "estimated time of arrival," what location is FEMA anticipating the deployment to? The edge of the 10-mile EPZ? The staging location determined by the wind direction? Or an estimate to the front of the 10-mile EPZ and to the other side of the 10-mile EPZ? NPPs can be in isolated areas or isolated by geography and bridges, making estimation of "time of arrival" exceedingly difficult. Plus road and weather conditions are not being taken into account. Plans should not include "estimated time of arrival" unless FEMA makes it a consistent effort.	Noted	REP Program Manual says "recommends." The intent is to establish an estimate for planning purposes.
Criterion I.8	FEMA-2008-0022-0113-042	North Carolina Division of Emergency Management, Stephen Payne	Page II-71 Line 27-41 & Page II-72, Line 1-43 (Sub section 8-Field Team Procedures.)RECOMMENDATION/COMMENT:REFORMAT ENTIRE SECTION IN BULLET OUTLINE FORM BASIS:Procedures described her should be found ONLY in SOP/SOG documents. Inclusion in Plans robs the plan of the flexibility necessary to responded to a range of events.	Modified	The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO. See Appendix B - Glossary of REP Terms for the definition of "plans/procedures."
Criterion I.8	FEMA-2008-0022-0111-019	Illinois Emergency Management Agency, Andrew Velasquez	page II-71 paragraph 5 , how communications are accomplished should be demonstrated in the exercise, not explained in the plan.	Rejected	The plan/procedure describing the communications system is necessary.
Criterion I.8	FEMA-2008-0022-0108-066	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-71/II-73 Line: 40/8 Comment: Why does FEMA prefer for FMTs to traverse the plume to obtain peak measurements? It does not seem to conincide the ALARA philosphy.	Modified	OROs obtain peak measurements according to their plans/procedures. FMTs are not required to enter the center of the plume if plans/procedures are in place to acquire a centerline measurements or peak exposure rates. Using plume edge measurements and calculating back to the centerline is an acceptable method; however, entering the plume provides the most reliable measurements. See the "Direction of Field Teams" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.8	FEMA-2008-0022-0113-041	North Carolina Division of Emergency Management, Stephen Payne	Page II-71, Line 40-41 RECOMMENDATION/COMMENT: DELETE FOLLOWING: “Preferably, State or local teams will traverse the plume to obtain peak and plume-edge measurements, but only at locations where they will not exceed turn-back exposure values.”BASIS:This should be an individual State decision not Federal direction.	Modified	Agreed. The reference to turn-back values has been deleted. How plume measurements are obtained is determined by ORO plans/procedures. See the "Direction of Field Teams" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.8	FEMA-2008-0022-0108-067	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-72 Line: 24 Comment: Change micro R meter to uR.	Accepted	The REP Program Manual has been amended as suggested. See Field Monitoring Equipment - Environmental Media Sampling Equipment subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.8	FEMA-2008-0022-0122-007	Emergency Management and Homeland Security Division , James Porcello	Definition of operational check is inconsistent and should be clarified. It is possible to have two different standards (perhaps different names) for operational checks; one standard for the Field Monitoring Teams (FMT) and one for everyone else. The FMT personnel should have additional training and be more familiar with their equipment. Berrien County recently received a planning issue for not properly completing an operational check on a CDV-700. The staff completed a check of the batteries, headphones, and that the meter responded to the check source, but did not have a value for the check source reading to indicate that the meter was responding accurately.	Modified	Detailed information on equipment maintenance and operational checks is under Criterion H.10. Additional clarification has been added to Criteria I.8 and K.5.a. See the "Field Monitoring Equipment - (4) Field Team Procedures" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.8	FEMA-2008-0022-0077-006a	PA DEP Bureau of Radiation Protection, David Allard	Page II-72, Lines 39-41, and Page II-73, Lines 1-2Comment: Under 'Ambient Radiation Measurements', it is stated, "... and that the beta window on the instrument's probe, when conducting open-window readings, should point up for waist level or higher readings and down for near-ground readings." The requirement for the probe to point up for open-window readings at waist level or higher is not supported in any document PA BRP is familiar with. -- In FEMA-REP-2, "Guidance on Offsite Emergency Radiation Measurement Systems, Phase 1 - Airborne Release", June 1990, open and closed window readings are discussed in Section 4.4, Instrumentation Requirements and Alternatives. FEMA-REP-2 does not specify the directionthe probe should point for open-window readings: "In the case of ground deposition, this can be determined by varying the height of the detector above the ground using open and closed window detector measurements, and observing the variations in the instrument readings." (Section 4.4, page 4-17) Since probes are normally held with the window pointing down, a reasonable reading of this section would be that the probe window would point down for both	Modified	The cited line has been amended to read, "When conducting open-window readings, it is recommended that that the beta window on the instrument’s probe point up for waist level or higher readings and down for near-ground readings." See the "Field Monitoring Equipment - (4) Field Team Procedures" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.8	FEMA-2008-0022-0077-006b	PA DEP Bureau of Radiation Protection, David Allard	(continued)waist level and ground level open-window readings.-- In FEMA-REP-14, "Radiological Emergency Preparedness Exercise Manual", September 1991, under Objective 6, Criterion I.11-4, page D.6-8, open and closed window readings are discussed in detail. It specifies that open-window readings at ground level are to be performed with the window facing down, but is silent on the direction the open-window should face for waist level readingsThe practice of PA BRP is to point the open window down for both waist level and ground level readings. This is consistent with the FEMA guidance noted above. Pointing the window down for open-window ground level readings is common sense, and PA BRP sees no benefit that is gained by pointing the window up for waist-level open-window readings as opposed to pointing the window down. We do not agree that pointing the open-window up for waist level readings is necessary, or supported by any technical reason. PA BRP requests that FEMA modify lines 1-2 on Page II-73, so the sentence reads: "... should point (up for waist level or higher readings and) down for near-ground readings."		
Criterion I.8	FEMA-2008-0022-0111-018	Illinois Emergency Management Agency, Andrew Velasquez	page II-74 paragraph 4, it is impossible to require deployment times, estimated or otherwise, as monitoring location points is situation dependent for field team crews based on plant conditions and decisions made by the Radiological Emergency Assessment Center (REAC).	Noted	REP Program Manual says "recommends." The intent is to establish an estimate for planning purposes.
Criterion I.8	FEMA-2008-0022-0108-068	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-74 Line: 10-12/41-42 Comment: Estimated times to transport samples to laboratories has the same problem as "estimated time of arrival" for FMTs. See I.8, II-71, 25-26 entry.	Noted	REP Program Manual says "recommends." The intent is to establish an estimate for planning purposes.
Criterion I.8	FEMA-2008-0022-0113-043	North Carolina Division of Emergency Management, Stephen Payne	Page II-74, Line 12-19 RECOMMENDATION/COMMENT:REFORMAT ENTIRE PARAGRAPH BASIS:Reformat to bring inline with previous paragraph format. This is NOT a sub paragraph.	Accepted	The REP Program Manual has been amended as suggested. See Field Monitoring Equipment - Laboratories subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.8	FEMA-2008-0022-0121-068	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -74 Line: 13 Comments: Why transport plume phase samples to the laboratory within 4 hours? Completed within 4 hours of what? Does this mean 4 hours from the time the sample was taken?	Noted	The four-hour time frame is appropriate to support timely data generation to support protective actions for the health and safety of the public.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.8	FEMA-2008-0022-0073-021	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-70Comment: Lines 26-43. Criterion 1.8. Paragraph 10. This subsection is titled Radiological Exposure Control; yet seems to restate the tasks stated in paragraphs 1-9 and appears to have NOTHING to do with Radiological Exposure Control for Field TeamsPotential Impact: RECOMMENDATION: Remove Criterion 1.8. paragraph 10 or at least re-write it in order to address radiological exposure control for Field Monitoring TeamsComment By: State Department of Health	Modified	The cited bullets are intended to summarize what plans/procedures should include relative to all of I.8, not just paragraph 10. The introductory text to the bullet list has be amended to read, "To meet the intent of Criterion I.8, plans/procedures shall describe:" See the bullet list under Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.9					
Criterion I.9	FEMA-2008-0022-0020-027	Ashtabula County EMA, George Rolland	Page Ref. II-75 Comment: Line 22 - should be 10 to the minus (-) 7 Comment by: State & Locals	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0021-027	Geauga County DES, Dale Wedge	Page Ref. II-75 Comment: Line 22 - should be 10 to the minus (-) 7 Comment by: State & Locals	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0036-027	Lake County EMA, Larry Greene	Page Ref. II-75 Comment: Line 22 - should be 10 to the minus (-) 7 Comment by: State & Locals	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0077-007	PA DEP Bureau of Radiation Protection, David Allard	Page II-75, Line 22Comment: The figure for radioiodine concentration should be 10-7 , not 107 .	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0086-025	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	I.9 Page II-75, line 22: Comments: The level of 10^7 uCi/cc is in error and the exponent should as a minimum be corrected to state l0^7 uCi/cc. In addition, it is our understanding that this value originally was mistakenly stated as "10^7 uCi/cc by omission of a number in front of the l0^7 uCi/cc concentration value. It is suggested that the corrected, higher concentration value be included under this criterion.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.9	FEMA-2008-0022-0097-052	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 11-15, Line 22: “air in theplume exposure EPZ as low as 107 µCi/cc (microcuries per cubic centimeter) under…….”COMMENT: Correct the minimum value to read 10-7 µCi/cc.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0097-053	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 75, Line 22: Thelower limit of detetction for radioiodine concentrations is incorrectly listed as 1E 7 uCi/cc.COMMENT: Revise the value to 1E-7 to be consistent with the lower limit specified elsewhere in the document.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0101-053	Florida Division of Emergency Management, Michael Younger	Page II-75, line 22 Needs to be corrected to read “as low as 10-7µCi/cc (microcuries per cubic centimeter)”	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0106-060	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-75, Line 22Comment: NUREG 0654/REP-1 reflects that it should be measure radioiodine concentrations in air in the plume exposure EPZ as low as 10-7µCi/cc (microcuries per cubic centimeter), not 107.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0116-066	Nuclear Energy Institute, Alex Marion	Part II.C, I.9, (line 22): “air in the plume exposure EPZ as low as 10^7 µCi/cc (microcuries per cubic centimeter) under…….” Part II.C, I.9, (line 22): Correct the minimum value to read 10^-7 µCi/cc.	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0129-013	Wisconsin Emergency Management, Teri Engelhart	Page: II-75, Line: 22 Comment: There is a typo: it should be 10-7 µCi/cc (rather than 107)	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.9	FEMA-2008-0022-0121-069	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -75 Line: 22 Comments: Typo: 1*Of* ~Ci/cc should be 10-7~Ci/cc	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0071-001	Georgia Environmental Protection Division, Jim Hardeman	The language on p. II-75, lines 29-34, regarding the use of a laboratory to assess air samples for radioiodine concentration, appears to contradict language on the same subject on p. II-74, lines 17-20.	Noted	The the two items cited by the commenter address different things. The reference in I.8 is to laboratory analysis, whereas the reference in I.9 is to immediate measurement in the field.
Criterion I.9	FEMA-2008-0022-0101-054	Florida Division of Emergency Management, Michael Younger	Page II-75, lines 39-40 Needs to be corrected to read “as low as 10-7µCi/cc (microcuries per cubic centimeter)”	Accepted	The REP Program Manual has been amended as suggested. See Evaluation Criterion 1.9 in Part II.C Planning Guidance.
Criterion I.9	FEMA-2008-0022-0121-070	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: 11-75 Line: 35 Comments: You cannot eliminate background when you are in a field that is in the hundreds of mR/hr. The paragraph implies that you should be able to count it while in the plume.	Noted	The cited language is not addressing eliminating background, but rather being able to compensate to maintain the required detection parameters.
Criterion I.9	FEMA-2008-0022-0121-071	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -76 Line: 23-24 Comments: Other terms used for the phases are early, intermediate, late and recovery. It would be helpful if only one term for each phase was agreed to among the different federal agencies. 3 phases? These 3 phases are fully understood. Those are not the 3 phases that are listed in EPA-400. Both of these activities take place in the intermediate phase.	Modified	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Terminology differs between organization because of each organization's focus and activities. The REP Program Manual has been reviewed whereever the term "phase" is used and has been amended for as much consistency as possible. See Part 1.E - Technical Basis for the REP Program, Section 5 - Radiological Incident Phases.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.11					
Criterion I.11	FEMA-2008-0022-0073-022	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-77Comment: Lines 17-31. Criterion 1-11: Department of Health (DOH) will NOT send Field Monitoring Teams (FMTs) inside the plume during a release. DOH FMTs are not equipped with respiratory protection. DOH Field Team Captains follow ALARA during all phases of operation. Air samples will be collected from the plume boundary areas.Potential Impact: Deliberately sending FMT's into high dose or contamination areas flies in the face of ALARA. There are accepted methods that can be used to calculate the dose at the plume centerline. RECOMMENDATION: DHS/FEMA should ensure that state or local radiation protection agencies are using models that are able to predict centerline dose rates.Comment By: State Department of Health	Noted	OROs obtain peak measurements according to their plans/procedures. FMTs are not required to enter the center of the plume if plans/procedures are in place to acquire a centerline measurements or peak exposure rates. Using plume edge measurements and calculating back to the centerline is an acceptable method; however, entering the plume provides the most reliable measurements. See the "Direction of Field Teams" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.11	FEMA-2008-0022-0101-055	Florida Division of Emergency Management, Michael Younger	Page II-77, lines 22-27 The use of field monitoring teams to establish the plume's peak concentrations or the centerline does not provide the best use of a responder's exposure. Bounding the release is the more important task. Consideration should also be given to the various federal resources that are available to assist in field monitoring	Modified	OROs must have the capability to obtain this information as quickly as possible. Federal assets may not be the most timely resource. If an ORO uses a centerline or peak reading from the utility, an LOA is not necessary. The ORO and utility should be working closely together routinely. REP Program Manual text has been amended to read, "For example, organizations may rely on Federal, licensee, or private (e.g., university, contractor, mutual-aid) FMT data. These arrangements should be established in a LOA, as appropriate." See the Explanation section for Evaluation Criterion I.11 in Part II.C - Planning Guidance.
Criterion I.11	FEMA-2008-0022-0111-020	Illinois Emergency Management Agency, Andrew Velasquez	page II-77. Another procedure that does not belong in the plan. The explanation does not allow the States flexibility when deciding whether or not to track the plume on the outer edges and/or peak areas. Sample techniques are scenario dependent. Any individual or agency committing personnel resources into a plume is violating ALARAprinciples.	Noted	OROs obtain peak measurements according to their plans/procedures. FMTs are not required to enter the center of the plume if plans/procedures are in place to acquire a centerline measurements or peak exposure rates. Using plume edge measurements and calculating back to the centerline is an acceptable method; however, entering the plume provides the most reliable measurements. See the "Direction of Field Teams" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.
Criterion I.11	FEMA-2008-0022-0078-041	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-77, lines 23-26 This refers to the plume, in the air, as opposed to the deposition footprint. Given at this point that any and all field monitoring resources will be deployed and stretched in their tasking; should not accurately identifying the extent of the plume and its boundaries be the highest priority, conferring the greatest public protection benefit? Shouldn't the emphasis be on those areas that have not yet been evacuated, opposed to those who already have?	Noted	OROs obtain peak measurements according to their plans/procedures. FMTs are not required to enter the center of the plume if plans/procedures are in place to acquire a centerline measurements or peak exposure rates. Using plume edge measurements and calculating back to the centerline is an acceptable method; however, entering the plume provides the most reliable measurements. See the "Direction of Field Teams" subsection within the Explanation section of Evaluation Criterion I.8 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion I.11	FEMA-2008-0022-0078-039	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-77, lines 23-26 "Should" or "shall"? Is this a recommendation or a regulatory requirement?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion I.11	FEMA-2008-0022-0078-040	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-77, lines 23-26 "Outside resources" needs to be defined, and examples given. The utility? Federal responders? What field monitoring resources exist that would not be already incorporated in the state plan	Noted	Outside resources are identified in the explanation section of Evaluation Criterion I.11 in Part II.C - Planning Guidance. Federal resources have been added to the existing text so that it now reads, "For example, organizations may rely on Federal, licensee, or private (e.g., university, contractor, mutual-aid) FMT data."
Criterion I.11	FEMA-2008-0022-0097-063	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.78, (lines 1-38): These requirements are specific to onsite actions and are misplaced in thisdocument.COMMENT: Delete or revise to show the relationship to the ORO.	Rejected	FEMA recognizes that these NUREG-0654/FEMA-REP-1 criteria are applicable only to the licensee. However, they are included in the REP Program Manual for informational purposes and to ensure consistency with the 16 Planning Standards. Because these criteria are applicable only to licensees, the Manual does not include any explanatory material.
Criterion I.11	FEMA-2008-0022-0116-074	Nuclear Energy Institute, Alex Marion	Part II.C, J.1, J.2, 1, p.78, (lines 1-38): These requirements are specific to onsite actions and are misplaced in this document. Part II.C, J.1, J.2, 1, p.78, (lines 1-38): Delete or revise to show the relationship to the ORO.	Rejected	FEMA recognizes that these NUREG-0654/FEMA-REP-1 criteria are applicable only to the licensee. However, they are included in the REP Program Manual for informational purposes and to ensure consistency with the 16 Planning Standards. Because these criteria are applicable only to licensees, the Manual does not include any explanatory material.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard J					
Criterion J.2					
Criterion J.2	FEMA-2008-0022-0108-069	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-78 Line: 23 Comment: Now that it has been recognized that FEMA requires the State and Local to be responsible for J.2, the criterion should be reworded. Based on the verbiage "Each licensee shall…," it sounds like the State and Local are not involved.	Noted	Criterion J.2 refers to the licensee's plan for evacuating the site. While OROs are not responsible for the licensee's plan, they may be called upon for assistance in implementing the site evacuation.
Criterion J.2	FEMA-2008-0022-0113-044	North Carolina Division of Emergency Management, Stephen Payne	Page II-78, Line 30-31 RECOMMENDATION/COMMENT:DEFINE SUBJECTIVE STATEMENT: "Large number of onsite personnel" BASIS:Recommend rewriting as follows to remove subjective ambiguous statement: :". . . licensee quickly evacuates a large number of onsite personnel (more than 2,000) in a short period of time."	Modified	The number of personnel varies by site. Site-specific considerations will determine whether the site evacuation would present a traffic control issue. REP Program Manual language has been clarified. See the Explanation section of Evaluation Criterion J.2 in Part II.C - Planning Guidance.
Criterion J.6 (licensee only)					
Criterion J.6 (licensee only)	FEMA-2008-0022-0113-045	North Carolina Division of Emergency Management, Stephen Payne	Page II-79, Line 32-34 RECOMMENDATION/COMMENT:ADD NRC COORDINATED EXPLAINATION TO REMOVE 30 MIN TIME REQUIREMENT DURING HOSTILE ACTION EVENT BASIS:While this Criterion is specifically Licensee related, an EXPLAINATION comment should be included to indicate that during hostile action events, this activity may not be accomplished within the specified time.	Rejected	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.6 (licensee only)	FEMA-2008-0022-0128-021	San Luis Obispo County Office of Emergency Services , Ron Alsop	Page II-80 - J.6 The added guidance assigns responsibility to OROs to include in ORO plans/procedures agreements between the licensee and OROs for providing the protective equipment and radioprotective drugs to offsite responders and to include provisions for timely procurement to support ORO response onsite.Any offsite response personnel who would be required to enter a licensee's site would be covered by the licensee's radiation protection program. The licensee's program description of measures taken to support offsite response should be sufficient and not require a separate agreement with OROs. There is no reason for ORO plans/procedures to provide for these contingencies.Explanation/recommendationAdded guidance should be deleted.	Modified	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See the Note for Evaluation Criterion J.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.6 (licensee only)	FEMA-2008-0022-0086-024	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Added explanation under J.6 that licensees should have arrangements for providing resources to ORO resources onsite. The language used is too prescriptive and rather should be to provide assurance of sufficient additional quantities of KI/dosimetry without being too prescriptive on exact numbers. Additional sources and distribution means should be considered and factored into HAB event planning.	Noted	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.6 (licensee only)	FEMA-2008-0022-0111-021	Illinois Emergency Management Agency, Andrew Velasquez	J.6 This is an onsite function that is under the NRC rules and regulations. Contrary to this, FEMA has decided to elaborate on what they feel should be included in the licensee's plan.	Noted	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.6 (licensee only)	FEMA-2008-0022-0102-033	Entergy Nuclear Operations, Inc., Michael Slobodien	Added explanation under J.6 that licensees should have arrangements for providing resources to ORO resources onsite.	Noted	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.6 (licensee only)	FEMA-2008-0022-0097-054	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.6 COMMENT: The added guidance assigns responsibility to OROs to include in ORO plans/procedures agreements between the licensee and OROs for providing the protective equipment and radioprotective drugs to offsite responders and to include provisions for timely procurement to support ORO response onsite. This added guidance goes beyond the intent of criterion J.6. and should be deleted.BASIS: Any offsite response personnel who would be required to enter a licensee’s site would be covered by the licensee’s radiation protection program. The licensee’s program description of measures taken to support offsite response should be sufficient and not require a separate agreement with OROs. There is no reason for ORO plans/procedures to provide for these contingencies.	Noted	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.6 (licensee only)	FEMA-2008-0022-0116-067	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion J.6 – The added guidance assigns responsibility to OROs to include in ORO plans/procedures agreements between the licensee and OROs for providing the protective equipment and radioprotective drugs to offsite responders and to include provisions for timely procurement to support ORO response onsite. This added guidance goes beyond the intent of criterion J.6. and should be deleted.Basis: Any offsite response personnel who would be required to enter a licensee's site would be covered by the licensee's radiation protection program. The licensee's program description of measures taken to support offsite response should be sufficient and not require a separate agreement with OROs. There is no reason for ORO plans/procedures to provide for these contingencies.	Noted	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.6 (licensee only)	FEMA-2008-0022-0121-072	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -80 Line: 10-12 Comment: It would be helpful to give examples or further guidance on how this may be accomplished during a fast breaking hostile action event.	Modified	The cited text has been reduced to a suggestion that OROs be aware of the licensee's arrangements. Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness. See the Note for Evaluation Criterion J.6 in Part II.C - Planning Guidance.
Criterion J.7 (licensee only)					
Criterion J.7 (licensee only)	FEMA-2008-0022-0108-014	Louisiana Department of Environmental Quality, Cheryl Chubb	There are some technical references that should be included in the manual. J.7 notes Tables 2.1 & 2.2 of EPA-520/1-75-001. J.10.a notes Table J-1 from NUREG-0654/FEMA-REP-1. Would it be possible to include referenced Tables in an Appendix or if possible, with the criterion?	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.7 (licensee only)	FEMA-2008-0022-0108-015	Louisiana Department of Environmental Quality, Cheryl Chubb	There are some technical references that should be included in the manual. J.7 notes Tables 2.1 & 2.2 of EPA-520/1-75-001. J.10.a notes Table J-1 from NUREG-0654/FEMA-REP-1. Would it be possible to include referenced Tables in an Appendix or if possible, with the criterion?	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.7 (licensee only)	FEMA-2008-0022-0097-064	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.80, (line 27): This section only acknowledges NUREG-0654 for EAL classification schemes.COMMENT: This section should be revised to include all endorsed methodologies as well as EAL schemes which may have been approved by the NRC. One approach would be to acknowledge those EAL schemes that have been endorsed under Reg Guide 1.101 and any other site specific NRC Approved EAL schemes. BASIS: The recommended approach encompasses NUREG-0654 Appendix I and all other currently approved EAL schemes while providing continued guidance for evaluation by referencing the dynamic approval document/authority for EALs.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.7 (licensee only)	FEMA-2008-0022-0116-075	Nuclear Energy Institute, Alex Marion	Part II.C, J.7, p.80, (line 27): This section should be revised to include all endorsed methodologies as well as EAL schemes which may have been approved by the NRC. One approach would be to acknowledge those EAL schemes that have been endorsed under Reg. Guide 1.101 and any other site specific NRC Approved EAL schemes.Basis: The recommended approach encompasses NuREG-0654 Appendix I and all other currenly approved EAL schemes while providing continued guidance for evaluation by referencing the dynamic approval document/authority for EALs.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.7 (licensee only)	FEMA-2008-0022-0109-032	Ottawa County, Ohio, Koch Beth	page II-80, line 27:COMMENT: All endorsed methodologies and EAL schemes which were approved by the NRC should be included.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.9					
Criterion J.9	FEMA-2008-0022-0073-023	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-81Comment: Criterion J.9: Comment 1: In Washington State the protective action decision making authority resides with the COUNTY level elected officials or THEIR authorized designee, Potential Impact: #1: The State constitution and laws set forth which officials have the authority to make protective action decisions. DHS/FEMA should remember that each state affected by a nuclear power plant emergency has its own constitution and legal codes. There are many states where local legal codes take precedence over state rules.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.9	FEMA-2008-0022-0121-073	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -81 Line: 19 Comments: What is meant by "timeframe"?	Noted	The subsequent paragraph expands on the meaning of "timeframe." Under certain circumstances, it may be appropriate to take protective actions without waiting for release rate information or environmental measurements.
Criterion J.9	FEMA-2008-0022-0020-028	Ashtabula County EMA, George Rolland	Page Ref. II-81 Comment: line 21 (spelling) authories should be authorities	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0021-028	Geauga County DES, Dale Wedge	Page Ref. II-81 Comment: line 21 (spelling) authories should be authorities	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0036-028	Lake County EMA, Larry Greene	Page Ref. II-81 Comment: line 21 (spelling) authories should be authorities	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0121-074	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -81 Line: 23 "Rapidly escalating event" should be clearly defined. Does it mean the same as a "fast breaker" event? Didn't research indicate this a very small percent of accidents and need NOT be considered.	Noted	The rapidly escalating scenario variation has been added to enhance the challenge and reduce predictibility of exercises. Incidents may progress rapidly or result in an initial declaration of Site Area Emergency or General Emergency. HAB incidents, among others, could result in a rapidly-escalating event.
Criterion J.9	FEMA-2008-0022-0113-046	North Carolina Division of Emergency Management, Stephen Payne	Page II-81, Line 25 RECOMMENDATION/COMMENT:DELETE EXAMPLE BASIS:This example goes against the Unified or Joint command structure of event response by both Utility & ORO. It gives the impression that the Incident Command element is ONLY composed of ORO's.	Accepted	The cited example has been deleted. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0113-047	North Carolina Division of Emergency Management, Stephen Payne	."Page 82, Line 8 RECOMMENDATION/COMMENT: DELETE BASIS:This example goes against the Unified or Joint command of the event by both Utility & ORO. It gives the impression that the Incident Commander is only from an ORO. ALL Radiological events, especially hostile action events, should be responded to using a Unified or Joint command structure.	Modified	Criterion J.9 is not applicable to the licensee. REP Program Manual language has been modified to be to say simply "ORO authorities." See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.9	FEMA-2008-0022-0113-048	North Carolina Division of Emergency Management, Stephen Payne	."Page 82, Line 13 RECOMMENDATION/COMMENT: DELETE BASIS:Who is this and at what level are they? As written here this seems to indicate the Utility is the Incident Commander and is separate from the State & Local EOCs. This statement is in conflict with information provided in previous explanatory paragraphs.	Modified	Criterion J.9 is not applicable to the licensee. REP Program Manual language has been modified to be to say simply "ORO authorities." See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0078-006	Minnesota Homeland Security and Emergency Management , kevin Leuer	FEMA and the NRC keep stating the evacuations may not be needed in a hostile action event. The definition of a General Emergency ECL has not changed, if a hostile action results in a GE being declared then the state and local authorities should be the ones to determine what protective actions are needed. If NRC/FEMA doesn't feel that an evacuation is needed for some hostile action based General Emergency Classifications then why aren't they a Site Area Emergency Classification instead.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. It is important to recognize that it is the OROs, not FEMA or NRC, who decide what protective actions are appropriate to protect the health and safety of the public. Even though OROs prepare emergency plans with pre-authorized PADs tied to plant ECLs, OROs always have the right and responsibility to make different PADs if appropriate for the specifics of the incident. See REP Program Manual explanation under Evaluation Criterion D.4, which discusses evacuation "…unless other conditions make evacuation dangerous."
Criterion J.9	FEMA-2008-0022-0070-001	Georgia Environmental Protection Division, Jim Hardeman	Page II-81, line 32. The use of the terms "immediately" and "without waiting for release rate information or environmental measurements" here would seem to be counter to the concept of implementing protective measures "on the basis of Protective Action Guides". Many incident sequences may "involve actual or significant potential for offsite consequences" without being significant enough to warrant evacuation -- an example of such an event, which might reasonably be expected during the life of a PWR, would be a steam-generator tube rupture with intact fuel. This event would result in a release of radioactive material to the atmosphere, but would most likely not be significant enough to warrant offsite protective measures. OROs must have the opportunity to assess both the nature of the event and offsite conditions (such as adverse weather) which might make evacuation hazardous in making a protective action decision -- rather than automatically or "immediately" evacuating.	Modified	Certain types of incidents may require immediate protective actions. REP Program Manual language has been modified to immediately take "protective actions," rather than "evacuation." See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.9	FEMA-2008-0022-0095-033	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-81, line 32. The use of the terms "immediately" and "without waiting for release rateinformation or environmental measurements" here would seem to be counter to the concept of implementing protective measures" on the basis of Protective Action Guides." Many incident sequences may "involve actual or significant potential for offsite consequences" without being significant enough to warrant evacuation -- an example of such an event, which might reasonably be expected during the life of a PWR, would be a steam-generator tube rupture with intact fuel. This event would result in a release of radioactive material to the atmosphere, but would most likely not be significant enough to warrant offsite protective measures. OROs must have the opportunity to assess both the nature of the event and offsite conditions (such as adverse weather) which might make evacuation hazardous in making a protective action decision -- rather than automatically or "immediately" evacuating.	Modified	Certain types of incidents may require immediate protective actions. REP Program Manual language has been modified to immediately take "protective actions," rather than "evacuation." See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0097-065	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	COMMENT: p. II-82 (lines 10-12): Replace "responders" with "decision-makers" and replace "emergency workers" with "first responders.BASIS: Improves the clarity of the expectation.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0116-076	Nuclear Energy Institute, Alex Marion	Part II.C, J.9, p. II-82 (lines 10-12): If the decision is to evacuate some or all of the population in the EPZ, ORO responders should plan for contingencies that would minimize congestion caused by emergency workers entering the area at the same time that the public is evacuating. Part II.C, J.9, p. II-82 (lines 10-12): Replace "responders" with "decision-makers" and replace "emergency workers" with "first responders. "ORO [del: responders] [und: decision makers] should plan for contingencies that would minimize congestion caused by [del: emergency workers] [und: first responders] entering the area at the same time that the public is evacuating."Basis: Improves the clarity of the expectation.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning Guidance.
Criterion J.9	FEMA-2008-0022-0096-002	Anonymous	How, and how broadly, is "recreation area" to be defined? "Recreation area" usage his higly dependant on the time of year; for example camping/fishing in summer and hunting seasons in fall.	Noted	Recreation areas are defined by ORO plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.9	FEMA-2008-0022-0096-003	Anonymous	How then will "recreation ares" be incorporated in ETE studies?	Noted	ETEs take into consideration the use of recreation areas in the estimate of transient populations.
Criterion J.9	FEMA-2008-0022-0073-024	Washington Military Department Emergency Management Division, Jim Mullen	[Criterion J.9] Comment 2: NUREG-0654 does require planning for evacuation beyond the 10-mile Plume Emergency Planning Zone. Potential Impact #2: Again, while an admirable thought, planning beyond 10 miles brings up the argument of where to STOP drawing lines. Planning and exercising evacuation beyond current regulatory standards places an onerous burden on smaller jurisdictions in many states. This would in turn result in a dilution of the planning effort.	Noted	Criterion J.9 does not require planning for evacuation beyond 10 miles.
Criterion J.10.a					
Criterion J.10.a	FEMA-2008-0022-0080-011	Douglas Fleck	J.10.a pages II-83 These requirements need rewritten to keep pace with present technology. Most OROs have access to Geographical Information Systems (GIS) and other data/mapping technologies that they can access for any type of disaster. It makes no sense at all for OROs with this capability to waste time and resources cluttering up their plans with these maps merely to meet a federal requirement when we have the capability to retrieve, and if necessary, print this data immediately at hand via GIS. Recommend these criteria be changed to allow the use of GIS if available instead of frequently outdated, “hard copy” maps buried in plans.	Accepted	Map information, or a reference to its location, is required. REP Program Manual language has been amended to include GIS products. However, hard copies are still needed for review. See the Explanation section of Evaluation Criterion J.10.a in Part II.C - Planning Guidance.
Criterion J.10.a	FEMA-2008-0022-0113-049	North Carolina Division of Emergency Management, Stephen Payne	.”Page, 83, Line 1 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“The plans/procedures should reference the location or agency responsible for preparing maps and displays showing features or landmarks important to emergency response during the early phase of the emergency.” BASIS:With current GIS technology, this type of information is better kept in a separate electronic file that can be updated as needed from similar GIS files from health care or agricultural sources, etc. If kept separately, the files should be referenced and be available during FEMA staff assistance visits.	Rejected	FEMA agrees that the REP Program Manual should include reference to GIS, and has revised the existing language. See the Explanation section of Evaluation Criterion J.10.a in Part II.C - Planning Guidance. But a map or reference to the map location (and not just the agency that prepares the map) is necessary for inclusion in the plans/procedures. In addition, hard copies are still needed for review.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.a	FEMA-2008-0022-0100-014	Pennsylvania Emergency Management Agency, Henry Tamanini	(Pages II-83 and II-84) requires maps to be included in plans that show a variety of items including relocations centers, schools, day cares, etc. Many OROs utilize Geographical Information Systems (GIS) and other data/mapping technologies. We recommend that this criterion be modified to allow for the use of appropriate available technology in support of this criterion. If “hard-copy” maps are required, we recommend that such itemsbe considered as supporting documents and appropriately referenced. Theinclusions of images which have been reduced in size to fit within a plandocument are generally distorted.	Accepted	Map information, or a reference to its location, is required. REP Program Manual language has been amended to include GIS products. However, hard copies are still needed for review. See the Explanation section of Evaluation Criterion J.10.a in Part II.C - Planning Guidance.
Criterion J.10.a	FEMA-2008-0022-0080a-011	Pennsylvania Emergency Management Agency, Douglas Fleck	pages II-83 and II-84 require maps be included in plans that show a variety of items including relocations centers, schools, day cares, etc. These requirements need rewritten to keep pace with present technology. Most OROs have access to Geographical Information Systems (GIS) and other data/mapping technologies that they can access for any type of disaster. It makes no sense at all for OROs with this capability to waste time and resources cluttering up their plans with these maps merely to meet a federal requirement when we have the capability to retrieve, and if necessary, print this data immediately at hand via GIS. Recommend these criteria be changed to allow the use of GIS if available instead of frequently outdated, “hard copy” maps buried in plans.	Accepted	Map information, or a reference to its location, is required. REP Program Manual language has been amended to include GIS products. However, hard copies are still needed for review. See the Explanation section of Evaluation Criterion J.10.a in Part II.C -Planning Guidance.
Criterion J.10.a	FEMA-2008-0022-0080-012	Douglas Fleck	J.10.b Pages II-84 These requirements need rewritten to keep pace with present technology. Most OROs have access to Geographical Information Systems (GIS) and other data/mapping technologies that they can access for any type of disaster. It makes no sense at all for OROs with this capability to waste time and resources cluttering up their plans with these maps merely to meet a federal requirement when we have the capability to retrieve, and if necessary, print this data immediately at hand via GIS. Recommend these criteria be changed to allow the use of GIS if available instead of frequently outdated, “hard copy” maps buried in plans.	Accepted	Map information, or a reference to its location, is required. REP Program Manual language has been amended to include GIS products. However, hard copies are still needed for review. See the Explanation section of Evaluation Criterion J.10.a in Part II.C - Planning Guidance.
Criterion J.10.a	FEMA-2008-0022-0129-014	Wisconsin Emergency Management, Teri Engelhart	Page: II-83, Line: 38 - 39 Comment: Maps should be updated using the most current and accurate census data. OROs should be encouraged to use the most current applicable local mapping data, if available. They should not be obligated to use only the Census data if more current and/or accurate data is available.	Modified	REP Program Manual language has been modified to say, "the most current and accurate data (e.g., census data, State and county records, etc.)." See the Explanation section of Evaluation Criterion J.10.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.a	FEMA-2008-0022-0121-075	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -84 Line: 2 Comments: what is the benefit of including pre-selected radiological sampling and monitoring points?	Noted	The cited text mirrors text in the original Criterion J.10.a language. FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion J.10.b					
Criterion J.10.b	FEMA-2008-0022-0097-066	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.84, (line 20): COMMENT: Clarify the need for reporting sector data when the protective action strategies arecommunicated utilizing a zone approach.BASIS: Protective action decision are based on a zonal approach with the sector referenced in the NuREG forming a basis for the original delineation of the zones. There is no value in reverting to sectors once the zones are agreed upon between the licensee and responsible OROs. Population numbers should be reported in a manner consistent with the protective action zones (evacuationareas)	Modified	The requirement to present information in sector format applies only to licensees. The sentence about sector formats has been deleted from the explanation since that is ORO guidance. FEMA has provided this comment to the NRC for situational awareness. See the Explanation section of Evaluation Criterion J.10.b in Part II.C - Planning Guidance.
Criterion J.10.b	FEMA-2008-0022-0116-077	Nuclear Energy Institute, Alex Marion	Part II.C, J.10.b, p.84, (line 20): Clarify the need for reporting sector data when the protective action strategies are communicated utilizing a zone approach. Basis: Protective action decisions are based on a zonal approach with the sector referenced in the NuREG forming a basis for the original delineation of the zones. There is no value in reverting to sectors once the zones are agreed upon between the licensee and responsible OROs. Population numbers should be reported in a manner consistent with the protective action zones (evacuation areas)	Modified	The requirement to present information in sector format applies only to licensees. The sentence about sector formats has been deleted from the explanation since that is ORO guidance. FEMA has provided this comment to the NRC for situational awareness. See the Explanation section of Evaluation Criterion J.10.b in Part II.C - Planning Guidance.
Criterion J.10.b	FEMA-2008-0022-0128-022	San Luis Obispo County Office of Emergency Services , Ron Alsop	page 84, line 20: This section requires data to be presented in sectors by the licensee in accordance with the NUREG criteria.COMMENTs: Protective action decisions are based on a zonal approach with the sector referenced in the NuREG forming a basis for the original delineation of the zones. There is no value in reverting to sectors once the zones are agreed upon between the licensee and responsible OROs.Explanation/recommendation: Population numbers should be reported in a manner consistent with the protective action zones (evacuation areas). Change reference from sectors to zones.	Modified	The requirement to present information in sector format applies only to licensees. The sentence about sector formats has been deleted from the explanation since that is ORO guidance. FEMA has provided this comment to the NRC for situational awareness. See the Explanation section of Evaluation Criterion J.10.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.b	FEMA-2008-0022-0121-076	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -84 Line: 27 Comments: Maps showing day care center populations and other special populations would require a significant effort. Population (estimated) for recreaction areas is simply excessive.	Noted	Some sites have significant seasonal population fluctuations or other special population groups and must be prepared for the possibility of implementing protective actions for those populations.
Criterion J.10.b	FEMA-2008-0022-0121-016	Utility Radiological Safety Board of Ohio, Nancy Dragani	Requiring maps and listings of day care and special populations would be a significant effort and be an undue burden on the state and counties.	Noted	OROs need to have estimates of populations of people with disabilities and access/functional needs for planning purposes.
Criterion J.10.b	FEMA-2008-0022-0078-042	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-84, lines 28-29 “Should” (recommendation) vs. “shall” (requirement)?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion J.10.b	FEMA-2008-0022-0078-043	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-84, lines 28-29 How, and how broadly, is “recreation area” to be defined?	Noted	Recreation areas are defined by ORO plans/procedures.
Criterion J.10.b	FEMA-2008-0022-0078-044	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-84, lines 28-29 How then will “recreation areas” be incorporated into ETE studies?	Noted	ETEs take into consideration the use of recreation areas in the estimate of transient populations.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.b	FEMA-2008-0022-0129-015	Wisconsin Emergency Management, Teri Engelhart	Page: II-84, Line: 29 Comment: Please define “Recreation Area.”	Noted	Recreation areas are defined by ORO plans/procedures.
Criterion J.10.d					
Criterion J.10.d	FEMA-2008-0022-0020-031	Ashtabula County EMA, George Rolland	Page Ref. II-86 Comment: line 34 (spelling) accomidation should be accommodation	Accepted	The REP Program Manual has been amended as suggested. See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
Criterion J.10.d	FEMA-2008-0022-0021-031	Geauga County DES, Dale Wedge	Page Ref. II-86 Comment: line 34 (spelling) accomidation should be accommodation	Accepted	The REP Program Manual has been amended as suggested. See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
Criterion J.10.d	FEMA-2008-0022-0036-031	Lake County EMA, Larry Greene	Page Ref. II-86 Comment: line 34 (spelling) accomidation should be accommodation	Accepted	The REP Program Manual has been amended as suggested. See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
Criterion J.10.d	FEMA-2008-0022-0101-058	Florida Division of Emergency Management, Michael Younger	Page II-86, line 34 Correct spelling of the word “accommodation”	Accepted	The REP Program Manual has been amended as suggested. See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
Criterion J.10.d	FEMA-2008-0022-0108-072	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-86 Line: 34 Comment: Typo - "accomidation" should be "accommodation".	Accepted	The REP Program Manual has been amended as suggested. See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
Criterion J.10.d	FEMA-2008-0022-0120-006	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-86, line 1-6 Governmental is spelled wrong.	Accepted	The REP Program Manual has been amended as suggested. See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.d	FEMA-2008-0022-0121-078	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -85 Line: 34-35 Comments: A list of people responsible for planning and implementing protective actions is unnecessary.	Noted	OROs need to have contact information for the person responsible for planning and implementing protective actions at institutional facilities. Lists containing personal information are confidential and should be incorporated by reference.
Criterion J.10.d	FEMA-2008-0022-0078-045	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-85, lines 33-35 “Should identify” (recommendation) or shall identify (requirement)?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion J.10.d	FEMA-2008-0022-0078-050	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-86, lines 1-2 What does “recommend” mean in regulatory terms?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
unlicensed daycare centers					
unlicensed daycare centers	FEMA-2008-0022-0097-057	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.d Delete the statement recommending that OROs make provisions for unlicensed day care providers.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0097-058	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.d BASIS: FEMA's expectations for planning for unlicensed day care providers are not clear. The planning guidance for disabled persons is unrealistic and overly prescriptive.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0097-059	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.dOROs would not necessarily know, or have a means of knowing, who these providers are. Unlicensed providers often operate intermittently and provide care for children on a small scale. Is there any reason why these providers would not be considered members of the public rather than special facilities or institutions warranting special provisions.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0118-008	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Criterion J.l0.d recommends that planning beprovided for any unlicensed day care provider. This needs to remain purely arecommendation and not a requirement. All parties should be aware this is only arecommendation. References to unlicensed providers also appear numerous other timesthroughout the document. If it is FEMA's intent to require planning for unlicensedproviders, be advised that this is not feasible. Unlicensed providers are not tracked andare therefore unknown to the REP planners.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0090-011	York County Office of Emergency Management, James Welty	Page II-85, Lines 33-35: Insert licensed before the word day care. It is impossible to know all the unlicensed day care centers within the EPZ	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0121-017	Utility Radiological Safety Board of Ohio, Nancy Dragani	The state and counties would have difficulties in identifying unlicensed and "exempt" day care providers.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0130-016	State of Vermont, Barbara Farr	Page II-86: Unlicensed or exempt day care providers requirement.Basic CommentsThere is no way to identify an unlicensed day or child care facility. Change all references to day care centers to “licensed or approved child care facilities”.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0020-030	Ashtabula County EMA, George Rolland	Page Ref. II-86 Comment: line 1 - Delete the unlicensed or exempt day care providers requirement. This is unreasonable since unlicensed day care providers don't have to report their existence and so no way to find them all. Comment by: Locals	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0021-030	Geauga County DES, Dale Wedge	Page Ref. II-86 Comment: line 1 - Delete the unlicensed or exempt day care providers requirement. This is unreasonable since unlicensed day care providers don't have to report their existence and so no way to find them all. Comment by: Locals	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
unlicensed daycare centers	FEMA-2008-0022-0036-030	Lake County EMA, Larry Greene	Page Ref. II-86 Comment: line 1 - Delete the unlicensed or exempt day care providers requirement. This is unreasonable since unlicensed day care providers don't have to report their existence and so no way to find them all. Comment by: Locals	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0052-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	How is a jurisdiction supposed to conduct planning for unlicensed of exempt daycares? Being unlicensed or exempt would mean that the authority having jurisdiction would have no way of knowing that they are there because there is no requirement to report. The reference to unlicensed or exempt daycares should be removed.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0052-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	Does this mean that all of the EV-2 requirements for schools in the guidance and NUREG-0654/FEMA REP 1 apply to “day-care centers”?2. Can you better define what a “day-care center” is?3. Is a licensed home daycare considered a day-care center?4. Is it the intent of this sentence to mean all licensed day care centers and or all licensed providers or just the corporate type day-care centers? In Minnesota we have specific laws that require virtually all in home daycares to be licensed regardless of the number of children being taken care of. Most of the in home day-care providers do not have the transportation capability to transport the children any significant distance from the home.5. Would this include adult day-care centers or just child day-care centers?6. Would “day-care centers” be required to demonstrate their plans and capability through an evaluated EV-2 type exercise at least once in every 6 year cycle the same as schools?	Modified	The glossary definition for "daycare center" has been amended to read "Daycare center: a specialized program or facility that provides care for children from infants through preschool age, usually within a group framework, and handicapped or dependent children or adults, either as a substitute for or an extension of home care." See Appendix B - Glossary of REP Terms. The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). Private entities are not required to participate in exercises; however, FEMA encourages OROs to work with private entities to participate to the extent possible.
unlicensed daycare centers	FEMA-2008-0022-0073-031	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-86Comment: Line 1. Criterion J.10.d. Recommend deleting the "unlicensed" or "exempt" day care providers requirement. This is unreasonable since unlicensed day care providers don't have to report their existence and so no way to find them all unless they self-register.Potential Impact: This places an unreasonable requirement on the locals to track unlicensed providers.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0079-013	Delaware Emergency Management Agency, James Turner	Part II Page 86 Issue: Unlicensed or exempt day care provider's requirement. Basis/Comment: This is an unreasonable statement since there is no mechanism to identify unlicensed day cares. They are not allowed in this state, and a cease and desist order is promulgated followed by civil action to terminate their function, if necessary.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0101-056	Florida Division of Emergency Management, Michael Younger	Page II-86, line 1 A better distinction needs to be made between "unlicensed" and "exempt" day care providers. Otherwise, it presents a challenge in identifying day care providers that are unlicensed by choice in lieu of having an exemption to registration.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0105-008	Tennessee Emergency Management Agency, Gary Lima	Unlicensed or exempt Day Care Centers can not be accounted for in REP planning. They are not seen; therefore they are not reachable by direct ORO direction and control.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0116-069	Nuclear Energy Institute, Alex Marion	FEMA's expectations for planning for unlicensed day care providers are not clear. The planning guidance for disabled persons is unrealistic and overly prescriptive. OROs would not necessarily know, or have a means of knowing, who these providers are. Unlicensed providers often operate intermittently and provide care for children on a small scale. Is there any reason why these providers would not be considered members of the public rather than special facilities or institutions warranting special provisions.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0127-007	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page II-86 Line 1: Comment: We do not know what unlicensed or "exempt" daycare centers are nor are we able to form a planning base for such an entity neither do we know how FEMA might endeavor to evaluate whether or not all unlicensed or "exempt" daycare centers are accounted for since they are exempt or unlicensed.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0109-034	Ottawa County, Ohio, Koch Beth	page II-85, line 1: FEMA recommends that planning be provided for any unlicensed or “exempt” day care providers.COMMENT: There is no way to accurately identify “unlicensed” or “exempt” day care providers.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0121-079	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -86 Line: 1 Comments: How do we (state/county) find info on unlicensed or "exempt" day care providers?	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0129-016	Wisconsin Emergency Management, Teri Engelhart	Page: II-86, Line: 1 Comment: Unlicensed daycare centers. Lines 5 - 6 state that daycares "located within the physical structure of a religious building" are exempt from licensing. Are these the only unlicensed daycares that would have to be planned for? Otherwise, it is unrealistic to identify unlicensed day care providers. Please consider specifying that these are the only unlicensed daycares that require planning, or removal of this requirement.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0128-024a	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-86, lines 1, 11-15, 26 – 36: Means for protecting unlicensed day cares, health care facilities and disabled persons.COMMENTs: OROs would not necessarily have a means of knowing who or where unlicensed day care providers are. Unlicensed providers often operate intermittently and provide care for children on a small scale. Since they are unlicensed there is no governmental entity that tracks these facilities. These providers should be considered members of the public rather than special facilities or institutions warranting special provisions.Health Care facilities are responsible for having facility specific evacuation plans and procedures. To make the ORO responsible for describing a means of evacuating patients in these types of facilities is unrealistic. SLO County PHD and Emergency Medical Services Agency coordinate with the County's Long Term Care Ombudsmen to provide evacuation templates and training to these types of facilities. In addition our current plans and procedures require coordination with these facilities for transportation in the event that they must evacuate.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0128-024b	San Luis Obispo County Office of Emergency Services , Ron Alsop	(continued)Reference to "means of protecting all categories of disabled individuals'" is not appropriate. We can only protect (or attempt to protect) those individuals who self register to be on the ORO's list.Explanation/recommendationDelete the statement recommending that OROs make provisions for unlicensed day care providers.Delete statement recommending OROs describe means of evacuating patients in hospitals, nursing homes and other healthcare facilities.Modify criterion to say that OROs should establish method identifying persons and healthcare facilities that would need notification and transportation assistance in the event of a radiological emergency.		
unlicensed daycare centers	FEMA-2008-0022-0078-051	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-86, lines 1-2 What would planning for unlicensed or exempt day care providers look like? The authority having jurisdiction would have no way of knowing the existence of these providers, because they have no requirement to report. The reference to unlicensed or exempt day cares needs to be removed.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0090-009	York County Office of Emergency Management, James Welty	Page II-86, Lines 1-6: Who will provide the planning for unlicensed day care centers when we do not even know they exist? Also, these centers are for profit and should already be planning for emergencies.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0108-073	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-86 Line: 1-6 Comment: Licensing standards establish legal responsibilities for managers of "licensed" providers for emergency situations. As "unlicensed" daycare centers do not have the licensing standards or legal responsibilities to adhere to, it is unreasonable to provide planning for these providers. How do you locate all the "unlicensed" daycare centers?	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0120-007	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-86, line 1-6 To what extent are agencies supposed to plan for unlicensed day cares? How can you plan for them if you don't even know that they exist since they are unlicensed?	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0110-029	Alabama Emergency Management Agency, J Frank Price	page II-86, lines 1-7: How are the local planners to find all possible daycare center and providers? These can come and go overnight and requiring this in the planning should be as they self identify	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

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unlicensed daycare centers	FEMA-2008-0022-0113-050	North Carolina Division of Emergency Management, Stephen Payne	Page 86, Line 6RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“FEMA recommends that planning be provided for state licensed day care providers.”BASIS:As written, this statement addresses “unlicensed or “exempt” day care providers.” The referenced footnote only addresses LICENSED daycare providers thereby putting the statements in conflict with each other.Recommending the planning for any “unlicensed or “exempt” day care providers” places an undue requirement and burden on local EM agencies to track and accomplish planning activity.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0086-027	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-86, line 8: The statement recommending that OROs make provisions for unlicensed or exempt day care providers should be deleted. Unlicensed or exempt day care providers should appropriately be treated as the general public.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0106-062	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-86, Line 8Comment: "FEMA recommends that planning be provided for any unlicensed … daycare". Unlicensed daycare indicates that they will not be known to authorities authorities, so how can one plan for unlicensed daycare? As there is no way of finding these facilities without a great amount of time and energy expended, it becomes an unreasonable planning requirement.Potential Impact: Require additional manpower for planning and training, neither of which States or counties can afford presently.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
unlicensed daycare centers	FEMA-2008-0022-0102-037	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-87, Line 9: The statement recommending that OROs make provisions for unlicensed or exempt day care providers should be deleted. Unlicensed or exempt day care providers should appropriately be treated as the general public.	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
other daycare center comments					
other daycare center comments	FEMA-2008-0022-0078-046	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-85, lines 33-35 In the section above, day care centers are clearly classified as schools. Does this mean that all EV-2 requirements for schools in this guidance and NUREG-0654/FEMA REP 1 apply to “day care centers”? Would “day care centers” be required to demonstrate their plans and capability through an evaluated EV-2-type exercise at least once in the same 6-year cycle as schools?	Modified	The REP Program Manual language regarding planning for daycare centers has been amended for clarity. Evaluation of daycare centers is conducted according to conditions of licensing and as specified in ORO plans/procedures. See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
other daycare center comments	FEMA-2008-0022-0078-049	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-85, lines 33-35 Is this requirement intended to apply to all licensed day cares and/or all licensed providers, or just the corporate-type day care centers? This distinction is important. Minnesota has specific laws requiring licensing for virtually all in-home daycares, regardless of the number of children being cared for. Most in-home day care providers do not have the transportation capability to transport children any significant distance from the licensed home.	Modified	The REP Program Manual language regarding planning for daycare centers has been amended for clarity. Evaluation of daycare centers is conducted according to conditions of licensing and as specified in ORO plans/procedures. See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
other daycare center comments	FEMA-2008-0022-0078-047	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-85, lines 33-35 What is the definition of a “Day Care Center”?	Modified	The glossary definition for "daycare center" has been amended to read "Daycare center: a specialized program or facility that provides care for children from infants through preschool age, usually within a group framework, and handicapped or dependent children or adults, either as a substitute for or an extension of home care." See Appendix B - Glossary of REP Terms. The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes. See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
other daycare center comments	FEMA-2008-0022-0078-048	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-85, lines 33-35 Is a home daycare licensed for 12-15 children considered a “day care center”?	Modified	Yes. If a facility is licensed by the local licensing authority, then it would need to be planned for the same as a school. OROs would need to ascertain the level of assistance needed to and identify resources. The referenced REP Program Manual text has been deleted. The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended. See Appendix B - Glossary of REP Terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
term "prisons"					
term "prisons"	FEMA-2008-0022-0042-010	Ned Wright	Page II-87, Line 7: “Prisons” Add “or other correctional facilities.” There are several types or levels of correctional facilities other than prisons that could be affected that have similar restrictions to movement of those persons confined.	Accepted	The REP Program Manual has been amended to use the term "correctional facilities" in place of "prisons." See the Correctional Facilities subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
term "prisons"	FEMA-2008-0022-0108-074	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-87 Line: 7-9 Comment: "Prison" should be replaced with "Correctional Center."	Modified	The REP Program Manual has been amended to use the term "correctional facilities" in place of "prisons." See Correctional Facilities subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
term "disabled"					
term "disabled"	FEMA-2008-0022-0108-071	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-85/II-86 Line: 26/30-41 Comment: "Disabled" should be replaced with "Special Needs" or "Special Populations."	Modified	The REP Program Manual has been amended to replace the term "disabled" with "persons with disabilities and access/functional needs." This section within the explanation for Evaluation Criterion J.10.d has been renamed "Documented Individuals who need assistance in an evacuation." See the "Documented individuals who need assistance in an evacuation" subsection with the Explanation section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance.
transportation needs					
transportation needs	FEMA-2008-0022-0118-007	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Criterion J.lO.d indicates plans should describe anyspecial transportation needs and the specific transportation resources available to provide for transport of special needs populations in the entire EPZ. This requirement isunreasonable. The requirement to describe the processes for evacuating specialpopulations should be sufficient in describing that measures will be taken to transport thespecial needs populations using all appropriate, necessary, and available resources.	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
transportation needs	FEMA-2008-0022-0090-012	York County Office of Emergency Management, James Welty	Page II-85, Lines 30-31: Transportation needs would not be known until the event and are based on specific needs. This information would change day to day and the decisions would be made upon notification by the EOC Staff. This requirement should be removed	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0110-028	Alabama Emergency Management Agency, J Frank Price	page II-85, lines 30-31: This amount and types of emergency equipment cannot be in the plan since often private rescue vehicles are used and can change without notice	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0073-030	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-85Comment: Line 31.Critierion J.10.d. Recommend removing the phrase "including types and quantities of vehicles" Transportation needs for the 'mobility impaired' would not be known until the time of the emergency and would be based on the current facility census and specific needs. This info would change day-to-day and would be ascertained by the appropriate EOC position/person when they call to notify an agency or special needs person of the emergency. Additionally, transportation providers only need to know that the mission includes a special needs rider and what those needs are. The transportation provider can select the best vehicle for the job.Potential Impact: This places an unreasonable task on local level ORO's. The providers of the transportation asset know what equipment is necessary to transport mobility impaired people; they do it everyday as part of normal business.Comment By: State/Locals	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
transportation needs	FEMA-2008-0022-0020-029	Ashtabula County EMA, George Rolland	Page Ref. II-85 Comment: Line 31 - Delete - "including types and quantities of vehicles" - Transportation needs for the 'mobility impaired' would not be known until the time of the emergency and would be based on the current facility census and specific needs. This info would change day-to-day and would be ascertained by the appropriate EOC position/person when they call to notify an agency or special needs person of the emergency. Comment by: Locals	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0021-029	Geauga County DES, Dale Wedge	Page Ref. II-85 Comment: Line 31 - Delete - "including types and quantities of vehicles" - Transportation needs for the 'mobility impaired' would not be known until the time of the emergency and would be based on the current facility census and specific needs. This info would change day-to-day and would be ascertained by the appropriate EOC position/person when they call to notify an agency or special needs person of the emergency. Comment by: Locals	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0036-029	Lake County EMA, Larry Greene	Page Ref. II-85 Comment: Line 31 - Delete - "including types and quantities of vehicles" - Transportation needs for the 'mobility impaired' would not be known until the time of the emergency and would be based on the current facility census and specific needs. This info would change day-to-day and would be ascertained by the appropriate EOC position/person when they call to notify an agency or special needs person of the emergency. Comment by: Locals	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0106-061	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-85, Lines 32-33Comment: Again NRC/FEMA getting into the weeds for planning in requiring the description of transportation types and resources moving special needs personnel.	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
transportation needs	FEMA-2008-0022-0110-030	Alabama Emergency Management Agency, J Frank Price	page II-87, line 4: Transportation resources and number of mobility persons are ever changes numbers and putting the amount in the plan would be outdated by the time FEMA approved it. The plan should let the local OROs use planning information for all hazards for equipment needs and number of persons and this local plan can be in the REP plan.	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
transportation needs	FEMA-2008-0022-0073-032	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-87Comment: Lines 4-5. Criterion J.10.d. Delete the statement. Transportation needs for mobility impaired people not on any existing roster will have to be handled on an ad hoc basis. Furthermore, the inventory of special vehicles for the transport of mobility impaired changes often and is best handled by the service provider.Potential Impact: This places an undue burden on the local level ORO. A more common sense approach would be that they provide the information to the service provider that the person is mobility impaired and let the provider determine which vehicle is best suited to accomplish the mission.	Modified	The REP Program Manual text has been amended to read, "An up-to-date estimate of transportation needs and list of potential resources..." FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance
lists of individuals requiring assistance in an evacuation					
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0097-056	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.dThe criterion should say that OROs should establish method identifying persons who would need notification and transportation assistance in the event of a radiological emergency	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0097-067	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. II-85 (lines 22, 26-27, 30-31) and p. II-86 (lines 38, 39-41) p. II-87 (lines 4-5): Theplans/procedures should:• Include or reference lists of all disabled person in the EPZ and processes for keeping the lists up to date.• Describe any special transportation needs for these groups and the transportation resources, including types and quantities of vehicles to be used to move them should also be described.COMMENT: Delete both 'requirements'; info does not belong in a plan/procedure.BASIS: Lists of 'special needs' persons is to be kept confidential and thus should not be included in a plan/procedure. Specific transportation needs and specific resources (including types and quantities of vehicles) would not be known until the time of the emergency and would be based on the current facility census and specific needs. The info could/would change day-to-day andwould be ascertained by the appropriate EOC position/person when they call to notify an agency or 'special-needs' person of the emergency.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0128-023	San Luis Obispo County Office of Emergency Services , Ron Alsop	p. II-85 (lines 22, 26-27, 30-31) and p. II-86 (lines 38, 39-41) p. II-87 (lines 4-5)Lists of 'special needs' persons is to be kept confidential and thus should not be included in a plan/procedure. In addition reference to "means of protecting all categories of disabled individuals', is not appropriate. We can only protect (or attempt to protect) those individuals who self register to be on the ORO's list. Specific transportation needs and resources (including types and quantities of vehicles) would not be known until the time of the emergency and would be based on the current situation and need. The info would change day-to-day and would be ascertained during the notification process. Explanation/recommendation: Delete both 'requirements'; info does not belong in a plan/procedure. Revise line 26 to read: reference list of registered disabled persons in the EPZ and processes for keeping the lists up to date.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0109-033	Ottawa County, Ohio, Koch Beth	page II-85, lines 22, 26-27, 30-31) and p. II-86 (lines 38, 39-41) p. II-87 (lines 4-5): The plans/procedures should: Include or reference lists of all disabled person in the EPZ and processes for keeping the lists up to date.Describe any special transportation needs for these groups and the transportation resources, including types and quantities of vehicles to be used to move them should also be described.COMMENT: Lists of 'special needs' persons must be kept confidential and thus should not be included in a plan/procedure.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0116-078	Nuclear Energy Institute, Alex Marion	Part II.C, J.10.d, p. II-85 (lines 22, 26-27, 30-31) and p. II-86 (lines 38, 39-41) p. II-87 (lines 4-5): Delete both 'requirements'; info does not belong in a plan/procedure. Basis: Lists of 'special needs' persons is to be kept confidential and thus should not be included in a plan/procedure. Specific transportation needs and specific resources (including types and quantities of vehicles) would not be known until the time of the emergency and would be based on the current facility census and specific needs. The info could/would change day-to-day and would be ascertained by the appropriate EOC position/person when they call to notify an agency or 'special-needs' person of the emergency.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms). FEMA recognizes that transportation needs will be constantly changing, but believes that OROs need to have a planning basis for implementing protective actions. A baseline estimate of the types and quantities of vehicles needed and available should be included in the plans and can be updated as needed during an incident.
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0127-006	New Hampshire Homeland Security and Emergency Management, Michael Nawoj	Page II-85 Line 26: Comment: Many disabled persons decline for what ever reason to disclose their disability. Neither the state nor municipal officials have the authority to compel those persons to reveal their disability in order to meet this requirement. Currently persons who feel that they may need assistance in the event of an emergency may ask that they be included on a listing of persons with special needs. These lists are reviewed on a regular basis and inform the municipal planning base. The requirement that lists of ALL disabled persons is unrealistic. Neither is the term "disabled" properly or adequately defined (Citation of inadequate definition in appendix B notwithstanding)	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0121-018	Utility Radiological Safety Board of Ohio, Nancy Dragani	Also, listing of all disabled persons is nearly impossible to maintain as most do not self identify,	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0121-077	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -85 Line: 26-27 Comments: Lists of all disabled persons are nearly impossible to maintain - most do not self identify.	Noted	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0108-070	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-85 Line: 26-27 Comment: If a list of "all disabled persons in the EPZ" were included in a plan/procedure, it needs to be labeled as sensitive information and not made public. HIPAA.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0116-068	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion J.10.d – Means for protecting mobility impaired persons Part II.C, Criterion J.10.d – The explanation includes a statement that says that the plans/procedures should include or reference lists of all disabled persons in the EPZ and processes for keeping the lists up to date. This is an unrealistic expectation. The most that can be expected is that OROs will have a means of identifying mobility impaired persons who volunteer that they will need transportation assistance during an emergency. The criterion should say that OROs should establish method identifying persons who would need notification and transportation assistance in the event of a radiological emergency	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0102-036	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-86, Line 8: A listing of all disabled persons in the EPZ is not practical because such information is provided only on a voluntary basis and those contact lists are updated from year to year. Other methods are normally provided for disabled persons to contact offsite response agencies during an emergency if transportation or other assistance is required. It is not feasible to expect that alldisabled persons within the EPZ can be preidentified prior to an emergency. The wording for this criterion should be revised to state that OROs be required to establish means of identifying persons with special needs who would need notification and assistance in the event of a radiological emergency.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0097-055	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.d COMMENT: The explanation includes a statement that says that the plans/procedures should include or reference lists of all disabled persons in the EPZ and processes for keeping the lists up to date. This is an unrealistic expectation. The most that can be expected is that OROs will have a means of identifying mobility impaired persons who volunteer that they will need transportation assistance during an emergency.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0113-051	North Carolina Division of Emergency Management, Stephen Payne	Page II-87, Line 2 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING: A list (which may be included by reference) identifying all disabled individuals who need assistance within the EPZ and describing the procedure for keeping the list current.BASIS:This type of list must be included by reference only to maintain currency of the list and the plan in an economical manner	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0113-052	North Carolina Division of Emergency Management, Stephen Payne	. Page II-87, Line 8 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:A list (which may be included by reference) of transportation resources, including types and quantities, to move the mobility impaired BASIS:This type of list must be included by reference only to maintain currency of the list and the plan in an economical manner	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).
lists of individuals requiring assistance in an evacuation	FEMA-2008-0022-0086-026	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-87, Line 9: Comments: The recommendation to list all disabled persons in the EPZ is impractical because such information is provided to OROs on a voluntary basis and those contact lists are updated from year to year. Normally, additional mechanisms are provided for disabled persons to contact ORO or response agencies during an emergency if transportation or other assistance is required. It is unrealistic to expect that all disabled persons within EPZ can be pre-identified prior to an emergency. This is an unrealistic expectation. The wording for this criterion should be revised to state that OROs should establish means of identifying persons with special needs who would need notification and assistance in the event of a radiological emergency.	Modified	Lists containing personal information are confidential and should be incorporated by reference. REP Program Manual language has been modified to state that plans should reference lists of "documented individuals needing assistance with evacuation" rather than "all disabled individuals." General resources available to assist evacuation of persons with disabilities and access/functional needs should be known to the ORO for planning purposes. See "Documented individuals who need assistance in an evacuation" subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance. In addition, the glossary entry for "Persons with disabilities and access/functional needs" has been clarified (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.e					
Criterion J.10.e	FEMA-2008-0022-0073-033	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-87Comment: Criterion J.10.e: Given that REP Program evaluators have a diverse range of experience and opinion; DHS/FEMA should publish a patient information form for use by state and local authorities in those portions of their Plans and Procedures pertaining to the use of Potassium-Iodide (KI).Potential Impact: A DHS/FEMA accepted format will prevent situations where the opinion of an evaluator causes one agency to be held to a "higher" standard than another. RECOMMENDATION: Suggest that DHS/FEMA prepare a KI minimal information form for use by state and local entities. In this instance the criterion deals with a specific drug, therefore it should be easy for DHS/FEMA to either generate what is acceptable or refer state and local planners to a Food and Drug Administration or a Centers for Disease Control KI information sheetComment By: State Department of Health	Modified	It was not the intent of the REP Program Manual guidance to suggest that OROs develop their own patient information form. The REP Program Manual paragraph containing the reference to information to be provided with KI on page II-88, lines 8-12, has been replaced with the following sentence: "The plans/procedures should include a statement that the manufacturer's instructions will be provided with KI." Patient information can be obtained from the CDC and FDA web sites. See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0100-015	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-88, Line 8 requires that a copy of the Potassium Iodide (KI) instructions be included in the plans/procedures. We recommend that this requirement be modified to require that the KI instruction be available with the KI supplies and procedures per existing FDA requirements.	Modified	The cited REP Program Manual paragraph containing the reference to information to be provided with KI has been replaced with the following sentence: "The plans/procedures should include a statement that the manufacturer's instructions will be provided with KI." See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0080-013	Douglas Fleck	Page II-88, Line 8 requires a copy of KI instructions be placed in plans/procedures. What possible advantage is to be gained by placing this information in state and municipal plans? The first responders do not normally access these plans and copies of the instructions are provided to everyone who receives KI. Recommend this requirement be deleted.	Modified	The cited REP Program Manual paragraph containing the reference to information to be provided with KI has been replaced with the following sentence: "The plans/procedures should include a statement that the manufacturer's instructions will be provided with KI." See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0080a-012	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-88, Line 8 requires a copy of KI instructions be placed in plans/procedures. What possible advantage is to be gained by placing this information in state and municipal plans? The first responders do not normally access these plans and copies of the instructions are provided to everyone who receives KI. Recommend this requirement be deleted.	Modified	The cited REP Program Manual paragraph containing the reference to information to be provided with KI has been replaced with the following sentence: "The plans/procedures should include a statement that the manufacturer's instructions will be provided with KI." See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0113-053	North Carolina Division of Emergency Management, Stephen Payne	."Page II-88, Line 9 RECOMMENDATION/COMMENT: DELETE:BASIS: These requirements are specified in EPA documentation and not necessary in ORO plans. At most should be referenced in a local plan.	Modified	The cited REP Program Manual paragraph containing the reference to information to be provided with KI has been replaced with the following sentence: "The plans/procedures should include a statement that the manufacturer's instructions will be provided with KI." See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.e	FEMA-2008-0022-0108-075	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-88 Line: 4 Comment: If a plan/procedure is to include "information regarding EWs and others who have declined the use of KI in advance," then it needs to be labeled as sensitive information and not made public.	Noted	Blank forms without names are non HIPPA information. Plans may include the blank form, along with a reference to where the actual information may be found (e.g., at the EOC).
Criterion J.10.e	FEMA-2008-0022-0078-052	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-88, line 11Technically there is no such thing as an iodine allergy. This should be referred to as iodine sensitivity.	Modified	The cited REP Program Manual text has been deleted.See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0020-032	Ashtabula County EMA, George Rolland	Page Ref. II-88 Comment: Line 24 - spelling of aquire to acquire	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0021-032	Geauga County DES, Dale Wedge	Page Ref. II-88 Comment: Line 24 - spelling of aquire to acquire	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0036-032	Lake County EMA, Larry Greene	Page Ref. II-88 Comment: Line 24 - spelling of aquire to acquire	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0113-054	North Carolina Division of Emergency Management, Stephen Payne	Page II-88, Line 27-28RECOMMENDATION/COMMENT: DELETE BASIS:This requirement is NOT part of Criterion G.1. G.1. addresses the distribution of INFORMATION not prophylactic drugs.	Accepted	The REP Program Manual reference cited has been changed from G.1 to J.10.f. See the Explanation section for Evaluation Criterion J.10.e in Part II.C - Planning Guidance.
Criterion J.10.e	FEMA-2008-0022-0130-017	State of Vermont, Barbara Farr	Page II-89: KI Administration.Basic CommentsRecheck wording, not all states instruct ingestion of KI. PAD should be followed and SOP within the approved plan.	Noted	Criterion J.10.f is applicable to the KI decision-making process consistent with the ORO's policy on the administration of KI (J.10.e). The text of Criterion J.10.f is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 are beyond the scope of this REP Program Manual revision. Note that the explanation Comment will be noted for consideration during future revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.f					
Criterion J.10.f	FEMA-2008-0022-0098-034	Kansas Department of Health and Environment, Thomas Conley	Section J.10.f, regarding KI. DHS/FEMA has stated in the draft REP program manual that; “Both Documents leave the decision on conditions that warrant administration of KI to State medical officials.” Retain the above statement and ensure that each regional RAC Chair provides regional specific KI distribution policies to REP evaluators. KI distribution and administration is based on the policies of each state involved in the REP Program.	Noted	It is FEMA policy to provide appropriate briefing to evaluators prior to an exercise.
Criterion J.10.f	FEMA-2008-0022-0079-014	Delaware Emergency Management Agency, James Turner	Part II Page 89 Issue: KI administration Basis/Comment: Recheck guidance for proper wording. Not all state instructs ingestion of KI at a General Emergency. This is based on SOPs within their approved plan	Noted	Criterion J.10.f is applicable to the KI decision-making process consistent with the ORO's policy on the administration of KI (J.10.e). The text of Criterion J.10.f is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 are beyond the scope of this REP Program Manual revision. Note that the explanation Comment will be noted for consideration during future revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.
Criterion J.10.f	FEMA-2008-0022-0073-034	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-89Comment: Lines 23-30. Criterion J.10.f: Discrepancy between EPA and FDA action levels, conditions and target populations for the administration of Potassium-Iodide (KI).Potential Impact: In Washington, the trigger levels for EMERGENCY WORKERS to take KI are either a projected exposure of 5 rem CDE or a radioiodine concentration in air of 1.4x10·7 microCi/cc (either measured or projected). RECOMMENDATION: DHS/FEMA has stated in the draft REP program manual that; "Both Documents leave the decision on conditions that warrant administration of KI to State medical officials." Retain the above statement and ensure that each regional RAG Chair provides regional specific KI distribution policies to REP evaluators. KI distribution and administration is based on the policies of each state involved in the REP Program. In Washington, it is not the policy of the state to stockpile KI for the general public. KI is on hand for emergency workers with a small stockpile on hand to accommodate follow*on shifts of emergency workers or unforeseen situations. The Washington State Department of Health, Office of Radiation Fixed Nuclear Facility plan clearly states the criteria for the administration of KI, and who can authorize its administration (either the State Health Officer or the County Health Officer) for emergency workers.	Noted	It is FEMA policy to provide appropriate briefing to evaluators prior to an exercise.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.f	FEMA-2008-0022-0020-033	Ashtabula County EMA, George Rolland	Page Ref. II-89 Comment: Line 27 says "administration of KI if the projected dose to the thyroid exceeds 5 rem" but the 6/15/02 Interim Guidance says "exceeds 25 rem". Both cite the same guidance. Which is correct? Comment by: Locals	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0021-033	Geauga County DES, Dale Wedge	Page Ref. II-89 Comment: Line 27 says "administration of KI if the projected dose to the thyroid exceeds 5 rem" but the 6/15/02 Interim Guidance says "exceeds 25 rem". Both cite the same guidance. Which is correct? Comment by: Locals	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0036-033	Lake County EMA, Larry Greene	Page Ref. II-89 Comment: Line 27 says "administration of KI if the projected dose to the thyroid exceeds 5 rem" but the 6/15/02 Interim Guidance says "exceeds 25 rem". Both cite the same guidance. Which is correct? Comment by: Locals	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0097-069	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	COMMENT: p. II-89 (line 27: Interim guidance of 6/15/02 says “exceeds 25 rem”. Both cite the same guidance. Which is correct? The guidance needs clarification on what the action level should be for recommending iIngestion of KI for general population and emergency workers.	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0116-079	Nuclear Energy Institute, Alex Marion	Part II.C, J.10.f, p. II-89 (line 27: …administration of KI if the projected dose to the thyroid exceeds 5 rem, without regard to the population….. Part II.C, J.10.f, p. II-89 (line 27): Interim guidance of 6/15/02 says “exceeds 25 rem”. Both cite the same guidance. The guidance needs clarification on what the action level should be for recommending ingestion of KI for general population and emergency workers.Basis: NEI recommends that FEMA reconcile the discrepancy.	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0109-035	Ottawa County, Ohio, Koch Beth	page II-89, line 27: …administration of KI if the projected dose to the thyroid exceeds 5 rem, without regard to the population.COMMENT: This conflicts with interim guidance 6/15/02.	Noted	The citations are both correct. They are different way of applying the guidance.
Criterion J.10.f	FEMA-2008-0022-0095-035	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Section J.10.f, regarding KI. DHS/FEMA has stated in the draft REP program manual that; “Both Documents leave the decision on conditions that warrant administration of KI to State medical officials.” Retain the above statement and ensure that each regional RAC Chair provides regional specific KI distribution policies to REP evaluators. KI distribution and administration is based on the policies of each state involved in the REP Program.	Noted	It is FEMA policy to provide appropriate briefing to evaluators prior to an exercise.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.f	FEMA-2008-0022-0121-080	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -90 Line: 36 Comments: What is the benefit for including "drivers" in plans/procedures--?	Noted	Drivers are a transportation resource.
Criterion J.10.h					
Criterion J.10.h	FEMA-2008-0022-0097-060	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.h COMMENT: The guidance is too prescriptive and misses the point where it prescribes radiological monitoring of house pets. The purpose of radiological monitoring of members of the public at reception centers is to assure the Red Cross that their shelters will not become contaminated byevacuees referred to shelters. Remove references to monitoring animals and household pet.BASIS: This added requirement does not comply with the intent of the original requirement to monitor the evacuated public in order to prevent contamination at Red Cross shelters.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0116-070	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion J.10.h – The guidance is too prescriptive and misses the point where it prescribes radiological monitoring of house pets. The purpose of radiological monitoring of members of the public at reception centers is to assure the Red Cross that their shelters will not become contaminated by evacuees referred to shelters.Remove references to monitoring animals and household pet. Basis - This added requirement does not comply with the intent of the original requirement to monitor the evacuated public in order to prevent contamination at Red Cross shelters.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0076-002	Georgia Environmental Protection Division, Jim Hardeman	Page II-91 line 18 through page II-92 line 7.The language here would seem to require OROs to develop procedures for radiological monitoring and "handling" of household pets (this term is undefined). The commenter is unaware of any guidance documents outlining appropriate monitoring techniques or criteria for household pets. Absent guidance, it is unclear how FEMA intends to assess the adequacy of ORO plans and procedures in this area.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0110-031	Alabama Emergency Management Agency, J Frank Price	page II-91, 18-42 and II-92, lines 1-7: This area gets to detailed with information. Red Cross has the guidance on shelters and household pets will be handled by local plans not the REP plan.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0122-004	Emergency Management and Homeland Security Division , James Porcello	When is it applicable to include household pets? How is household pet defined? What about security dogs? Including animals within the EPZ population numbers would unnaturally affect the size, nature, and quantity of the reception centers. What is the rationale for including pets in the EPZ count? How will guidance regarding pet radiological monitoring and decontamination be addressed?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0073-005	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualComment: BLANKET COMMENT: There are numerous references to service animals and household pets in this document. NUREG-0654 is silent regarding how to handle service animals and household pets. In the absence of a specific REGULATORY requirement, many jurisdictions have not developed plans and procedures to monitor, decontaminate or register these animals. In rural areas, there has been planning regarding livestock sheltering and monitoring as such animals are economically key to a community's prosperity. Other jurisdictions have taken steps to apply human monitoring and decontamination techniques in caring for service animals. There are many variables to this issue; people who are allergic to animals are much more common than individuals who are allergic to Potassium Iodide. Consider the lengths that have been gone to in order to ensure that the REP system accounts for this specific health condition.Potential Impact: RECOMMENDATION: That DHS/FEMA, the Food and Drug Administration, U.S. Department of Agriculture work with state level departments of agriculture or the state entity responsible for animal health and safety, and animal health advocacy groups in order to establish radiation health policies for animals. In addition to radiological concerns, there are animal health issues that must be addressed as well and issues that arise from human/animal interface.Comment By: State Health Dept.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0118-004	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Pets - Throughout the document there are multiple references to pets, however, there isno regulatory requirement placed on Offsite Response Organizations (OROs) or NuclearPower Plants (NPPs) requiring them to account for pets of evacuees. We recommenduniform requirements and guidance be put in place dictating standards regarding plauningfor evacuees' pets during a NPP event, to include decontamination, monitoring, tracking,etc.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0095-011	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	There are numerous references throughout the document to service animals and household pets. Neither the initial planning basis nor any guidance changes issued since that time has made planning for service animals or household pets a regulatory requirement. Lacking the guidance and direction for care and decontamination of animals, many state and local plans do not include them in their plans and procedures. Is it the intent of this document to make planning for service animals and pets a criterion for planning and then evaluation? Lacking new evaluation criteria, planning standards and regulatory authority, FEMA must remove any new references to pets and service animals in this document.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0098-011	Kansas Department of Health and Environment, Thomas Conley	There are numerous references throughout the document to service animals and household pets. Neither the initial planning basis nor any guidance changes issued since that time has made planning for service animals or household pets a regulatory requirement. Lacking the guidance and direction for care and decontamination of animals, many state and local plans do not include them in their plans and procedures. Is it the intent of this document to make planning for service animals and pets a criterion for planning and then evaluation? Lacking new evaluation criteria, planning standards and regulatory authority, FEMA must remove any new references to pets and service animals in this document.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0128-038	San Luis Obispo County Office of Emergency Services , Ron Alsop	Delete references to monitoring household pets. Delete p II-92 line 3.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0086-028	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	J.10.h; Page II-92, line 4: Comments: The commonly understood intent of Criterion J.12 is to assure adequate resources for the timely monitoring of evacuating persons arriving at relocation centers. The intent appears to have changed to include service animals and pets in the calculation of required monitoring resources. OROs should only be required to make provisions for the management and care of arriving animals, not to count their numbers for meeting the 12- hour monitoring requirement which is intended for people. Inclusion of animals in the total EPZ population should be deleted and instead be replaced by language that clarifies the expectation for proper management and care of animals so as not to impede timely monitoring of people at relocation centers. Service animals and pets need to be accommodated (given temporary care, monitored and decontaminated if necessary) but not within the time requirements needed for evacuees. Also, the phrase "where applicable" with regard to service animals and pets is confusing and should be deleted. It is unlikely that EPZs exist which have no pets or service animals.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0102-038	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-92, Line 4: First comment: Criterion J.12 was established to assure adequate resources for the timely monitoring of persons from evacuated EPZ areas who may be expected to arrive at relocation centers. The original intent appears to have changed to include service animals and pets in the calculation of required monitoring resources. OROs should only be required to make provisions for the management and care of arriving animals, not to count their numbers for meeting the 12-hour monitoring requirement which is intended for people. Inclusion of animals in the total EPZ population should be deleted and instead be replaced by clarifying language that more appropriately states the practical expectation to provide for proper management and care of animals in order not to interfere with the timely monitoring of people at relocation centers. Service animals and pets need to be accommodated (given temporary care, monitored and decontaminated if necessary) but should not be subject to the 12-hour time requirement needed for evacuees. Rationale: If taken literally, applying the same 12-hour time requirement to pets and service animals as is currently done for expected evacuees could have a very significant impact on required ORO monitoring resources	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0121-081	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -92 Line: 4 Comments: household pets could be a number of animals--and could present a real challenge for monitoring.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0101-057	Florida Division of Emergency Management, Michael Younger	Page II-92, lines 4-5 There is currently no guidance available concerning monitoring of evacuees' household pets. Additionally, there is currently no guidance referenced or cited (such as DAP 9523.19) as to what constitutes a household pet. Additional planning guidance related to animals should be provided prior to OROs being required to implement the related planning.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0044-017	Alliance For A Clean Environment , Lewis Cuthbert	A section in each shelter should accommodate pets.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0121-019	Utility Radiological Safety Board of Ohio, Nancy Dragani	Household pets could be any number of animals and could represent a real challenge or monitoring. What should be done with pets/service animals if they cannot be decontaminated?	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0108-076	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-91 Line: 23 Comment: Replace "disabled" with "special population" or "special needs."	Accepted	The REP Program Manual has been amended to replace the term "disabled" with "persons with disabilities and access/functional needs." See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0078-053	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-91, line 22 Should or shall? A recommendation or are backup reception centers required?	Modified	The term "backup" has been removed (See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance). Multiple centers may be necessary to allow for flexibility depending on the risk area. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Pat I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion J.10.h	FEMA-2008-0022-0078-054	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-91, line 22 Since Reception centers must be located a significant distance from the site why would back-up centers be required?	Modified	The term "backup" has been removed. Multiple centers may be necessary to allow for flexibility depending on the risk area. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance.
Criterion J.10.h	FEMA-2008-0022-0100-016	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-91, Line 22 requires plans to identify backup centers in the event that primary evacuation centers are filled or unavailable. Evacuation centers are predesignated based upon their ability to accommodate the projected number of evacuees. The use of mass care centers/shelters is a frequently occurring function of emergency management and Volunteer Organizations Active in Disasters (VOADs) in the “All-Hazards” planning and response paradigm.Therefore, we recommend that this requirement be either deleted or modified to include specific requirements reflecting the formula for calculating the number of required backup centers. Additionally, we further recommend that the appropriate references and guidance be provided for the determination of the capacity of an evacuation center/shelter. We understand that the American Red Cross document “ARC 3031” is no longer valid.	Modified	The term "backup" has been removed. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance. The planning basis for the number of shelters is discussed in Evaluation Criterion J.12 and is based on actual historical statistics on the percentage of the population that utilized shelters during real disasters.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0080a-013	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-91, Line 22 requires plans to identify backup centers in the event, one assumes, that primary evacuation centers are filled or unavailable. This gains nothing. Primary evacuation centers have already been pre-designated and certified based on their ability to accommodate the projected number of evacuees that will need this service. Anything above and beyond this will have to be handled as needed. To merely name some other potential sites accomplishes nothing and to certify additional, currently unneeded, sites is a waste of resources. Opening mass care centers is a frequently occurring function of emergency management. A nuclear power plant incident does not make it any more difficult. Recommend this requirement be deleted.	Modified	The term "backup" has been removed. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance. The planning basis for the number of shelters is discussed in Evaluation Criterion J.12 and is based on actual historical statistics on the percentage of the population that utilized shelters during real disasters.
Criterion J.10.h	FEMA-2008-0022-0129-017	Wisconsin Emergency Management, Teri Engelhart	Page: II-91, Line: 23 - 24 Comment: Requirement that back-up reception centers and animal friendly centers be identified.If backup centers are included in our plans and procedures, then does this require them to be evaluated as a primary facility by FEMA during biennial exercises?	Modified	The term "backup" has been removed. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance. The planning basis for the number of shelters is discussed in Evaluation Criterion J.12 and is based on actual historical statistics on the percentage of the population that utilized shelters during real disasters.
Criterion J.10.h	FEMA-2008-0022-0080-014	Douglas Fleck	Page II-91, Line 22 requires plans to identify backup centers in the event, one assumes, that primary evacuation centers are filled or unavailable. This gains nothing. Primary evacuation centers have already been pre-designated and certified based on their ability to accommodate the projected number of evacuees that will need this service. Anything above and beyond this will have to be handled as needed. To merely name some other potential sites accomplishes nothing and to certify additional, currently unneeded, sites is a waste of resources. Opening mass care centers is a frequently occurring function of emergency management. A nuclear power plant incident does not make it any more difficult. Recommend this requirement be deleted.	Modified	The term "backup" has been removed. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance. The planning basis for the number of shelters is discussed in Evaluation Criterion J.12 and is based on actual historical statistics on the percentage of the population that utilized shelters during real disasters.
Criterion J.10.h	FEMA-2008-0022-0078-055	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-91, line 22 If backup reception centers are required, what must be demonstrated (e.g., location, letters of agreement, monitoring equipment, training of backup reception center staff)?	Noted	The term "backup" has been removed. All reception centers listed in the plans/procedures are evaluated. See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0108-079	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-91 Line: 13-42 Comment: The "relocation center" is defined as a facility where monitoring, decontamination, registration AND congregate care occurs, "also referred to as congregate care centers." On page B-4, congregate care center is defined as "temporary housing, care and feeding of evacuees." On page B-22, reception center "generally refers to a facility where monitoring, decontamination and registration of evacuees are conducted. A reception center can also be referred to as a "relocation center." There is enough confusion in the manual that these three terms should be defined as complete and separate entities. CCC = CCC, RC = RC, Relocation center = RC + CCC. Pick one definition for "relocation center" so that plans/procedures are consistent through the regions. Until "relocation center" is defined as a single entity, it is difficult to determine what is expected of the State and local agencies for the successful demonstration of this criteria.	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified. There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.
Criterion J.10.h	FEMA-2008-0022-0113-055	North Carolina Division of Emergency Management, Stephen Payne	Page II-90, Line 24 RECOMMENDATION/COMMENT: DELETE SENTENCEBASIS:This sentence presupposes that OROs WILL conduct evacuation during a hostile action event. This is a decision that MUST be made based on existing conditions at the time of an event.	Rejected	Criterion J.10.g addresses evacuation specifically. Thus, the guidance provided under the explanation applies only in the event that a decision to evacuate has been made. It is intended to describe considerations if such an evacuation occurs during an HAB incident.
Criterion J.10.h	FEMA-2008-0022-0113-056	North Carolina Division of Emergency Management, Stephen Payne	."Page II-91, Line 23-24 RECOMMENDATION/COMMENT: DELETE WORD "PLANS"BASIS:Information listed here is too detailed for inclusion in a response plan.. It robs the plan of flexibility. It should be part of a REFERENCED SOP/SOG that can be update as necessary with out requiring a plan change.	Rejected	The comment is inconsistent with FEMA policy or best practices. The REP Program Manual guidance in Part II refers to "plans/procedures" specifically to allow for flexibility regarding whether procedures are incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0108-077	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-91 Line: 24 Comment: Typo - "accomodation" should be "accommodation".	Modified	The cited text has been deleted. The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.10.h	FEMA-2008-0022-0108-078	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-91 Line: 35 Comment: If a nursing home were to be evacuated to another nursing home, that determination would be made by the nursing home owners. As nursing home are not regulated in any FEMA demonstration, it is unlikely that the State would have access to their procedures. Does FEMA intend to review private nursing home procedures?	Noted	Review of nursing home plans is situation-dependent. The cited text specifies to IDENTIFY facilities that will support ORO response. The OROs may have mutual aid agreements with these facilities and review plans according to local plans/procedures.
Criterion J.10.h	FEMA-2008-0022-0128-025	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-91 (line 37) p II-92 (lines 3, 4-5): Relocation centers in host areas.COMMENTs: This requirement does not comply with the intent of the original requirement to monitor the evacuated public in order to prevent contamination at shelters.Hospitals, correctional facilities and nursing homes will not receive “evacuees. They may receive individuals from like facilities but would not be utilized for “evacuees” references in this criterion.	Noted	The cited facilities may receive a specialized group of all evacuees. ORO plans may have paired facilities where one nursing home, for example, would evacuate its residents to another.
Criterion J.10.h	FEMA-2008-0022-0113-057	North Carolina Division of Emergency Management, Stephen Payne	.”Page II-92, Line 4-5RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Provisions for the radiological monitoring of evacuees, evacuees’ service animals and household pets, where applicable, and evacuee vehicles (as necessary).”BASIS:100% monitoring of vehicles using proper monitoring techniques presents an unnecessary delay in the processing of evacuees. This monitoring should be done as necessary depending upon the circumstances requiring evacuation i.e. a precautionary evacuation of individuals BEFORE a release should NOT require vehicle monitoring.	Accepted	The evaluation area criterion clarifies that monitoring of vehicles is only required if the occupant is contaminated. Plans/procedures should specify how evacuee vehicles will be handled. The text has been amended to read "according to ORO plans/procedures." See the bullet list uner Evaluation Criterion J.10.h in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.h	FEMA-2008-0022-0113-058	North Carolina Division of Emergency Management, Stephen Payne	." Page II-92, Line 5-7 RECOMMENDATION/COMMENT: DELETEBASIS:As written, this presupposes that students will be relocated AFTER a release is in progress. Considering the importance of the safety of children in a radiological event, it is safe to assume they will be part of a precautionary relocation BEFORE a release occurs and therefore should NOT require monitoring. Depending on the local monitoring capabilities, monitoring of children that have not been exposed can be a traumatic experience.	Rejected	The comment is inconsistent with FEMA policy or best practices. It is not FEMA's intent to require unnecessary monitoring of students evacuated as a precautionary measure prior to any release. However, the existing language does recommend that OROs plan for the possibility that school students could be exposed to contamination.
Criterion J.10.i					
Criterion J.10.i	FEMA-2008-0022-0097-061	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.10.i COMMENT: There is no reason to include traffic capacities of evacuation routes in ORO plans/procedures. Delete the necessity to include traffic capacities of evacuation routes in ORO plans/procedures.BASIS: Traffic capacities are accounted for in the ETE calculations and vary by weather conditions.	Rejected	The text regarding traffic capacities is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. Hostile actions are among other examples cited in the explanation of factors that could affect evacuation.
Criterion J.10.i	FEMA-2008-0022-0116-071	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion J.10.i – There is no reason to include traffic capacities of evacuation routes in ORO plans/procedures. Delete the necessity to include traffic capacities of evacuation routes in ORO plans/procedures.Basis - Traffic capacities are accounted for in the ETE calculations and vary by weather conditions.	Rejected	The text regarding traffic capacities is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. Hostile actions are among other examples cited in the explanation of factors that could affect evacuation.
Criterion J.10.i	FEMA-2008-0022-0128-026	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-92, lines16 -32: Projected traffic capacities of evacuation routes.COMMENTs: Traffic capacities are accounted for in the ETE calculations and vary by weather conditions. Potential to use alternate routes depends on current conditions and should not be accounted for in plans and procedures. Having evacuation routes made public, which may or not be available during an evacuation could hamper the evacuation efforts.Explanation/recommendation: Delete criterion J.10.i.	Rejected	The text regarding traffic capacities is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. Hostile actions are among other examples cited in the explanation of factors that could affect evacuation.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.i	FEMA-2008-0022-0110-032	Alabama Emergency Management Agency, J Frank Price	page II-92, lines 20-21: Why does the REP plan need to list things like traffic capacity? If the ETE support the capacity for the EPZ then that information is the source document and added it just increases information that want be used by anyone but evaluators. Plans should not be written for evaluations.	Noted	The text regarding traffic capacities is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. Hostile actions are among other examples cited in the explanation of factors that could affect evacuation.
Criterion J.10.i	FEMA-2008-0022-0101-059	Florida Division of Emergency Management, Michael Younger	Page II-92, lines 20-23 While the plans and procedures should reference the ETE, inclusion of the traffic capacities is unnecessary. The key information from the ETE that needs to be included in the plans and procedures is the clearance times to evacuate the EPZ population under various conditions and the primary routes to be utilized. The reference to areas affected by hostile actions should be deleted and more emphasis placed on other factors from an all hazards perspective.	Noted	The text regarding traffic capacities is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. Hostile actions are among other examples cited in the explanation of factors that could affect evacuation.
Criterion J.10.i	FEMA-2008-0022-0120-008	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-92; 26-27 Significant is spelled wrong.	Modified	The cited misspelled word has been deleted.
Criterion J.10.i	FEMA-2008-0022-0108-080	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-92 Line: 27 Comment: Typo - "signifigant" should be "significant."	Modified	The cited misspelled word has been deleted.
Criterion J.10.i	FEMA-2008-0022-0097-070	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p.92, (line 28): This section references the current guidance for ETE in a footnote rather than in the body of the document.COMMENT: Revise to reference the current guidance NUREG/CR4831.	Accepted	The cited reference has been moved to the body of the document. See the bullet list under Evaluation Criterion J.10.i in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.i	FEMA-2008-0022-0116-080	Nuclear Energy Institute, Alex Marion	Part II.C, J.10.i, p.92, (line 28): This section references the current guidance for ETE in a footnote rather than in the body of the document. Part II.C, J.10.i, p.92, (line 28): Revise the body of the document to reference the current guidance.	Accepted	The cited reference has been removed from the body of the document. All references are listed under the References section. See the References section of Evaluation Criterion J.10.i in Part II.C - Planning Guidance.
Criterion J.10.i	FEMA-2008-0022-0109-036	Ottawa County, Ohio, Koch Beth	page II-92, line 28):COMMENT: Reference current guidance.	Accepted	The cited reference has been removed from the body of the document. All references are listed under the References section. See the References section of Evaluation Criterion J.10.i in Part II.C - Planning Guidance.
Criterion J.10.j					
Criterion J.10.j	FEMA-2008-0022-0101-060	Florida Division of Emergency Management, Michael Younger	Page II-93, line 18 Correct spelling of the word “relevant”	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.j in Part II.C - Planning Guidance.
Criterion J.10.j	FEMA-2008-0022-0108-082	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-93 Line: 18 Comment: Typo - "relavant" should be "relevant."	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.j in Part II.C - Planning Guidance.
Criterion J.10.j	FEMA-2008-0022-0020-034	Ashtabula County EMA, George Rolland	Page Ref. II-93 Comment: line 18 - spelling relavant to relevant	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.j in Part II.C - Planning Guidance.
Criterion J.10.j	FEMA-2008-0022-0021-034	Geauga County DES, Dale Wedge	Page Ref. II-93 Comment: line 18 - spelling relavant to relevant	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.j in Part II.C - Planning Guidance.
Criterion J.10.j	FEMA-2008-0022-0036-034	Lake County EMA, Larry Greene	Page Ref. II-93 Comment: line 18 - spelling relavant to relevant	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion J.10.j in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.j	FEMA-2008-0022-0086-029	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	J.10.i. Page II-93, line 20: Comments: Traffic capacities are determined in the computation of ETEs and do not add value to ORO plans/procedures. While it is useful to reference or extract portions of ETE results for assessment and operational response, having the raw traffic capacity information included in ORO plans/procedures would only add extraneous detail. Other tools, such as local route maps are available and effectively used by ORO agencies to address the need for alternate routing or evacuees. The requirement to include traffic capacities in ORO plans/procedures should be deleted from this criterion or better clarified.	Modified	This comment is outside the scope of the REP Program Manual. FEMA acknowledges what the commenter wrote. The text cited by the commenter is an original NUREG-0654/FEMA-REP-1 critierion and will not be deleted at this time. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 are beyond the scope of this REP Program Manual revision. Comment will be noted for consideration during future revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.
Criterion J.10.j	FEMA-2008-0022-0113-059	North Carolina Division of Emergency Management, Stephen Payne	."Page II-92, Line 24RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Maps should be referenced as recommended in Criterion J.10.a."BASIS:With current GIS technology, this type of information is better kept in a separate electronic file that can be updated as needed from similar GIS files from health care or agricultural sources. If kept in these files the files should be referenced and be available during on site staff assistance visits.	Accepted	The REP Program Manual has been amended as suggested. See bullet list under Evaluation Criterion J.10.i in Part II.C - Planning Guidance.
Criterion J.10.k					
Criterion J.10.k	FEMA-2008-0022-0108-083	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-94 Line: 11-13 Comment: How detailed do you want the manpower and equipment resources to be identified? For example, a police car could push a car out of the way to clear the impediment. Equipment - one police car. Manpower - one policeman.	Noted	The resources used will be situation-dependent. The plans should include a list of potential resources and manpower that may be called on.
Criterion J.10.k	FEMA-2008-0022-0073-035	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-94Comment: Lines 13-14. Criterion J.10.k. OROs have their own specialized list of resources and LOAs with the resources (e.g.; LLEA - tow truck companies; Public Works - debris removal equipment) for day-to-day business. Additional LOAs are not necessary.Potential Impact: Places an undue burden on the ORO to obtain and maintain a multitude of LOA's and multiple inventories that they do not have direct control over.Comment By: State/Local	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion J.10.k	FEMA-2008-0022-0020-035	Ashtabula County EMA, George Rolland	Page Ref. II-94 Comment: Line 13-14 OROs have their own specialized list of resources and LOAs with the resources (e.g.; Sheriff with tow truck companies) and would be available at the time of the emergency. Other LOAs not needed. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.k	FEMA-2008-0022-0021-035	Geauga County DES, Dale Wedge	Page Ref. II-94 Comment: Line 13-14 OROs have their own specialized list of resources and LOAs with the resources (e.g.; Sheriff with tow truck companies) and would be available at the time of the emergency. Other LOAs not needed. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion J.10.k	FEMA-2008-0022-0036-035	Lake County EMA, Larry Greene	Page Ref. II-94 Comment: Line 13-14 OROs have their own specialized list of resources and LOAs with the resources (e.g.; Sheriff with tow truck companies) and would be available at the time of the emergency. Other LOAs not needed. Comment by: Locals	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion J.10.k	FEMA-2008-0022-0113-060	North Carolina Division of Emergency Management, Stephen Payne	;Page II-94, Line 16-36 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING WITHOUT FOLLOWING:The plan should describe:1. Procedures for controlling road access to sheltered and/or evacuated areas, including organizations responsible for staffing TCPs/ACPs;2. Maps identifying TCPs/ACPs (may be incorporated by reference);3. Equipment and resources needed (e.g., cones, barricades); and4. Procedures and responsibilities for controlling access via other transportation modes.BASIS:Original wording provides sufficient information to accomplish this Criterion. Outline section duplicates verbage contained in main paragraph. If outline format is to be retained, editing of main paragraph should be accomplished to eliminate duplication.	Rejected	The existing language is adequate. Consistent with the format throughout Part II of the REP Program Manual, the bullets are intended to summarize the information in the explanatory text for quick reference.
Criterion J.10.l					
Criterion J.10.l	FEMA-2008-0022-0116-081	Nuclear Energy Institute, Alex Marion	Part II.C, J.10.l, p.94, (lines 32-37): This section references the guidance for ETE contained in appendix 4 of NuREG-0654. Part II.C, J.10.l, p.94, (lines 32-37): Revise to reference the current guidance NUREG/CR4831.	Noted	The guidance for ETEs is under revision. The new guidance will supersede all of NUREG-0654/FEMA-REP-1 Appendix 4 and NUREG/CR 4831 and will be cited in the REP Program Manual once it is finalized.
Criterion J.10.l	FEMA-2008-0022-0097-072	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Page 94, Line 32-37: This section references the guidance for ETE contained in appendix 4 of NuREG-0654. Revise to reference the current guidance NUREG/CR 4831	Noted	The guidance for ETEs is under revision. The new guidance will supersede all of NUREG-0654/FEMA-REP-1 Appendix 4 and NUREG/CR 4831 and will be cited in the REP Program Manual once it is finalized.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.l	FEMA-2008-0022-0109-037	Ottawa County, Ohio, Koch Beth	page II-94, lines 32-37COMMENT - Reference current guidance.	Noted	The guidance for ETEs is under revision. The new guidance will supersede all of NUREG-0654/FEMA-REP-1 Appendix 4 and NUREG/CR 4831 and will be cited in the REP Program Manual once it is finalized.
Criterion J.10.l	FEMA-2008-0022-0106-063	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-95, Lines 6 - 21Comment: Again NRC/FEMA are in the weeds with planning requirements. State and Local LLEAs have their own resource lists and LOAs for tow trucks; both State and Local Dept. of Roads/Transportation have snow plows. During the 4th of July 2002 Holiday Weekend, when both the East and West I-80 bridges were washed away in a flash flood, the NE Dept. of Roads responded along with the Nebraska Emergency Management Agency, Nebraska Highway Patrol and National Guard. While the Patorl and Guard worked the detour routes, the NE Dept. of Roads and it's contractors had replacement bridges in place 6 days later all without a list of resources in the State Emergency Operations Plan. In addition, during the Chadron, Nebraska wildfires, once again the NE Dept. of Roads and NE National Guard responded with water trucks and water tankers to assist in preventing Chadron State College from being burned down; again without a list of all the resources being in the State Emergency Operations Plan. There is no need to list the resources available in the plan as long as it is indicated who is responsible for providing them. Potential Impact: A plan will become so thick with hyperbole that no one will want to read, review it, or use it and will ignore it.	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
Criterion J.10.l	FEMA-2008-0022-0020-036	Ashtabula County EMA, George Rolland	Page Ref. II-95 Comment: Line 8 - Evacuation time estimates are based on specific subareas/evacuation areas and do not define by each population within that area (school children and other special populations) the amount of time an evacuation will take; only the time required for the population as a whole for that evacuation area is defined. This seems too prescriptive and the information would add no value to a plan or procedure since evacuations are for an entire subarea/area of the EPZ, not by different populations within that subarea/area. Comment by: Locals	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The estimated time required for the movement of school children and other special populations is important planning information and is typically included in the ETE.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.l	FEMA-2008-0022-0021-036	Geauga County DES, Dale Wedge	Page Ref. II-95 Comment: Line 8 - Evacuation time estimates are based on specific subareas/evacuation areas and do not define by each population within that area (school children and other special populations) the amount of time an evacuation will take; only the time required for the population as a whole for that evacuation area is defined. This seems too prescriptive and the information would add no value to a plan or procedure since evacuations are for an entire subarea/area of the EPZ, not by different populations within that subarea/area. Comment by: Locals	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The estimated time required for the movement of school children and other special populations is important planning information and is typically included in the ETE.
Criterion J.10.l	FEMA-2008-0022-0036-036	Lake County EMA, Larry Greene	Page Ref. II-95 Comment: Line 8 - Evacuation time estimates are based on specific subareas/evacuation areas and do not define by each population within that area (school children and other special populations) the amount of time an evacuation will take; only the time required for the population as a whole for that evacuation area is defined. This seems too prescriptive and the information would add no value to a plan or procedure since evacuations are for an entire subarea/area of the EPZ, not by different populations within that subarea/area. Comment by: Locals	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The estimated time required for the movement of school children and other special populations is important planning information and is typically included in the ETE.
Criterion J.10.l	FEMA-2008-0022-0073-036	Washington Military Department Emergency Management Division, Jim Mullen	Page Ref.: II-95Comment: Line 8. Criterion J.1 0.1. Evacuation time estimates are based on specific subareas/evacuation areas and do not define by each population within that area (school children and other special populations) the amount of time an evacuation will take; only the time required for the population as a whole for that evacuation area is defined. This seems too prescriptive and the information would add no value to a plan or procedure since evacuations are for an entire subarea/area of the EPZ, not by different populations within that subarea/area.Potential Impact: This would require extensive studies to catalog the data necessary to calculate the evacuation times for special population groups.Comment By: State/Locals	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The estimated time required for the movement of school children and other special populations is important planning information and is typically included in the ETE.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.m					
Criterion J.10.m	FEMA-2008-0022-0073-037	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-95Comment: Criterion J.10.m: Washington State has adopted the Nuclear Regulatory Commission preference to evacuate.Potential Impact: Standardized response when a General Emergency is declared speeds up evacuation and prevents confusion or delay while attempting calculate exposures based on building type. In Washington, the elected county level official is the decision maker. Residents of the Emergency Planning Zone are provided information on evacuation and steps to take if the ELECTED COUNTY OFFICIAL decides sheltering is more appropriate. RECOMMENDATION: DHS/FEMA should coordinate with the NRC regarding the "ideal" protective action(s).	Noted	This section of REP Program Manual language has been modified. Supplement 3 (the basis for this section) is undergoing revision and will be incorporated into the REP Program Manual when appropriate. PADs will be based on situational requirements and ORO plans/procedures.
Criterion J.10.m	FEMA-2008-0022-0044-014	Alliance For A Clean Environment , Lewis Cuthbert	Account for the wind direction at the time of the radiation release to avoid having masses of people evacuating with the plume. People should be told they may be asked to shelter in place or go a different direction.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. It is important to recognize that it is the OROs, not FEMA or NRC, who decide what protective actions are appropriate to protect the health and safety of the public. Even though OROs prepare emergency plans with pre-authorized PADs tied to plant ECLs, OROs always have the right and responsibility to make different PADs if appropriate for the specifics of the incident. See REP Program Manual explanation under Evaluation Criterion D.4, which discusses evacuation "…unless other conditions make evacuation dangerous."
Criterion J.10.m	FEMA-2008-0022-0044-021	Alliance For A Clean Environment , Lewis Cuthbert	The evacuation plan fails to account for the wind direction of the radiation plume after the accident or attack. Instead of traveling away from radiation releases in evacuation, large numbers of people would be traveling with the radiation released, increasing their exposure risk. Gridlock due to accidents, breakdowns, or just from heavy traffic would further extend exposure time in the plume. This is a serious oversight and flaw in the evacuation plan. The evacuation plan needs to redirect people in the predominant wind direction away from the plume of a nuclear disaster, to take another route to avoid prolonged radiation exposure or advise them to shelter in place until the safest route of evacuation can be determined.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. It is important to recognize that it is the OROs, not FEMA or NRC, who decide what protective actions are appropriate to protect the health and safety of the public. Even though OROs prepare emergency plans with pre-authorized PADs tied to plant ECLs, OROs always have the right and responsibility to make different PADs if appropriate for the specifics of the incident. See REP Program Manual explanation under Evaluation Criterion D.4, which discusses evacuation "…unless other conditions make evacuation dangerous."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.10.m	FEMA-2008-0022-0113-062	North Carolina Division of Emergency Management, Stephen Payne	'Page II-96, Line 5 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Evacuation is the recommended protective action unless site-specific conditions, threats, environmental conditions, or . . .BASIS:Rewording makes evacuation the recommended PAD not the prescriptive PAD based on the local evaluation of the current conditions. This also adds environmental conditions to the list of variables to be considered when making a PAD.	Modified	This section of REP Program Manual language has been modified, and the cited sentence has been deleted. Supplement 3 (the basis for this section) is undergoing revision and will be incorporated into the REP Program Manual when appropriate. PADs will be based on situational requirements and ORO plans/procedures. See the Explanation section of Evaluation Criterion J.10.m in Part II.C - Planning Guidance.
Criterion J.10.m	FEMA-2008-0022-0113-063	North Carolina Division of Emergency Management, Stephen Payne	."Page II-96, Line 9RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:These protective actions can be implemented for selected portions of the population prior to. . .	Modified	This section of REP Program Manual language has been modified, and the cited sentence has been deleted. Supplement 3 (the basis for this section) is undergoing revision and will be incorporated into the REP Program Manual when appropriate. PADs will be based on situational requirements and ORO plans/procedures. See the Explanation section of Evaluation Criterion J.10.m in Part II.C - Planning Guidance.
Criterion J.10.m	FEMA-2008-0022-0121-082	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -96 Line: 10 thru 31Comments: Dose projections associated with assumptions and research should not be contained in this manual. Particularly when the facts stated are from old references. References should be made to the source documents.	Noted	EPA-400 is currently under revision. The REP Program Manual will be updated as appropriate when the new EPA-400 is finalilzed.
Criterion J.10.m	FEMA-2008-0022-0113-061	North Carolina Division of Emergency Management, Stephen Payne	."Page II-96, Line 10-11RECOMMENDATION/COMMENT: DELETEBASIS:Criterion cannot reference itself for required actions.	Noted	Comment is not entirely clear. None of the footnotes on page II-96 contain a circular reference.
Criterion J.10.m	FEMA-2008-0022-0121-083	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -96 Line: 23 Comments: EPA-400 currently does not recommend sheltering for greater 10 Rem.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The guidelines for sheltering are currently undergoing revision. The REP Program Manual will be updated as appropriate when new guidance is finalized.
Criterion J.11					
Criterion J.11	FEMA-2008-0022-0113-064	North Carolina Division of Emergency Management, Stephen Payne	.Page II-98, Line 4-5RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . protective action at the time of the incident, based solely on plant status information without consideration ofdose projection calculations traffic impediments, adverse weather conditions, an airborne radioactive plume, or areas affected by hostile actions at the time of the accident."	Modified	This section of REP Program Manual language has been amended, and the cited sentence has been deleted. See the Explanation section of Evaluation Criterion J.10.m in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.11	FEMA-2008-0022-0129-018	Wisconsin Emergency Management, Teri Engelhart	Page: II-98, Line: 24 Comment: The use of the phrase, "relevent time" is vague. Please provide a more precise time reference	Noted	The term "relevant" is directly from the FDA document "Accidental Radioactive Contamination of Human Food and Animal Feeds: Recommendations for State and Local Agencies." The DILs apply for the first year after the accident, unless there is a concern that contamination will continue longer.
Criterion J.11	FEMA-2008-0022-0121-084	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -98 Line: 36-37 Comments: If the actions are listed as "preventive actions" and "emergency protective actions" then line 37 should not say "Preventive protective actions" - these two are mutually exclusive.	Accepted	The cited text in the REP Program Manual has been amended to read, "Preventive actions are taken to prevent…" See the Explanation section of Evaluation Criterion J.11 in Part II.C - Planning Guidance.
Criterion J.11	FEMA-2008-0022-0111-022	Illinois Emergency Management Agency, Andrew Velasquez	pages II-98 through II-104. lEMA objects to FEMA's desire to add greater detail in the ingestion pathway plans and procedures as the guidance implies specific methodology that goes well beyond the scope ofNUREG-0654/FEMA-REP-l, Rev. 1 language. FEMA is essentially unnecessarily restating the EPA PAG manual and FDA guidance, while leaving out important items that should be in a plan such as any mention of the National Response Framework, FRMAC and other federal agency support as a component of the OROs plans to address ingestion pathway issues. This level of detail is more appropriate for a reference and not planning criteria.	Rejected	The REP Program Manual is a compendium of guidance from many sources. The explanation provided under Criteria J.11 and J.12 includes details from EPA and FDA REP specific guidance for ease of reference.
Criterion J.11	FEMA-2008-0022-0113-066	North Carolina Division of Emergency Management, Stephen Payne	" Page II-100, Line 11-13 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"The geographical area affected by the embargo would depend on the accident sequence, and the meteorological conditions. Because of potential economic impacts, care should be taken when determining the area for a temporary embargo prior to determining the levels of contamination in food. The embargo should remain in effect at least until results are obtained."	Rejected	The existing language is appropriate and describes an example of a protective action (i.e., a temporary embargo). The commenter's suggestion would eliminate that description.
Criterion J.11	FEMA-2008-0022-0108-084	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-99 Line: 17-18 Comment: Is it reasonable to anticipate the extent and magnitude of the offsite contamination prior to declaration of an SAE or GE? It is unlikely, at NOUE or Alert, that OROs would take precautionary actions prior to an SAE.	Modified	"Should be taken" has been changed to "Should be considered." See the Precautionary Actions subsection within the Explanation section of Evaluation Criterion J.11 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.11	FEMA-2008-0022-0113-068	North Carolina Division of Emergency Management, Stephen Payne	Page II-100, Line 19 RECOMMENDATION/COMMENT: INSERT FOLLOWING:"Simple precautionary actions include modest adjustment of normal operations prior to arrival of contamination. While these will not guarantee that contamination in food will be below the DILs, but the severity of the problem should be significantly reduced. Typical precautionary actions include covering exposed products, moving animals to shelter, corralling livestock, and providing protected feed and water. Temporary embargos on food and agricultural products (including animal feeds) prevents the consumption of food that is likely to be contaminated. Distribution and use of possibly contaminated food and animal feeds is halted until protective actions are instituted. Temporary embargoes are applied when the concentrations are not yet known. Because there is potential for a negative economic impact on the community, justification for this action must be significant. The embargo should remain in effect at least until results are obtained. A temporary embargo should be issued only upon declaration of a GE and if predictions of the extent and magnitude of the offsite contamination are persuasive. The geographical area affected by the embargo would depend on the accident sequence, and the meteorological conditions."	Rejected	The existing language describing precautionary protection actions is adequate for implementing Criterion J.11.
Criterion J.11	FEMA-2008-0022-0113-065	North Carolina Division of Emergency Management, Stephen Payne	."Page II-99, Line 23 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Setting limits, called DILs (Derived Intervention Level), on the radionuclide activity . . ." Rewording indicates that DILs are a limit to be set AND provides an explanation of what DIL stands for.All abbreviations should be spelled out when used the first time.	Modified	The acronym "DIL" is first used in the Explanation section of Evaluation Criterion J.9 in Part II.C - Planning guidance and the definition has been added there. There are existing entries in Appendix A - Abbreviations and Acronyms and Appendix B - Glossary.
Criterion J.11	FEMA-2008-0022-0108-085	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-99 Line: 38 Comment: Based on the verbiage regarding the water, "Substituting uncontaminated feed." should read "Substituting uncontaminated feed for contaminated feed. It makes more sense if the verbiage was replaced to indicate substituting contaminated with uncontaminated. It sounds more positive that you are substituting/replacing/removing contaminated items and leaving uncontaminated in their place.	Accepted	The REP Program Manual text amended as suggested. See "Protective Actions for Animal Feeds Confirmed to be Contaminated" subsection within the Explanation section of Evaluation Criterion J.11 in Part II.C - Planning Guidance.
Criterion J.11	FEMA-2008-0022-0108-086	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-100 Line: 14-25 Comment: Does FEMA have any recommended mapping programs? Are there any Federal agencies that might have the capability to supply specific information (i.e., location of agribusiness)?	Noted	This information is usually available at the State level. The Advisory Team for Environment, Food and Health may also have information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.11	FEMA-2008-0022-0113-067	North Carolina Division of Emergency Management, Stephen Payne	Page II-100, Line 15RECOMMENDATION/COMMENT: CHANGE : “incidentally” TO “accidentally”	Modified	The word "incidentally" has been deleted. See the Explanation section of Evaluation Criterion J.11 in Part II.C - Planning Guidance.
Criterion J.11	FEMA-2008-0022-0121-085	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -101 Line: 4 Comments: How far outside 50-mile EPZ--this info will be impossible to obtain.	Noted	This information would be determined by ORO plans/procedures.
Criterion J.12					
Criterion J.12	FEMA-2008-0022-0078-059	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 How will “household pet” be defined?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0078-068	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 19-23 How will “household pet” be defined? Dogs, cats, snakes, turtles, ferrets, rats, birds, and lizards all present very different monitoring requirements and challenges	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-063	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 UsingThe monitoring of people at the reception centers is mostly based on the use of portal monitors which expedite the monitoring of people. The typical portal monitors cannot monitor a dog unless the dog can stand upright in the portal monitors for the required six seconds. The use of hand held monitors for pets in the volume anticipated is not practical for the pets.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0078-069	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-102, lines 19-23 There are no commercial portal monitors available that is appropriate for pets that will monitor beta and gamma radiation.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-070	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-102, lines 19-23 Minnesota reception centers employ Ludlum 52-1 portal monitors for personnel; one of very few and very similar models that are portable, detect beta and gamma, and meet the requirements as outlined in FEMA-REP-21. The dimensions of this model are 83”height x 28”width x24”depth, and when operational requires a count time of six seconds. Given these requirements, the pet either needs to be small enough to be carried through, or well trained enough to stand on its hind legs for at least six seconds. These issues need to be solved technologically before this can be implemented as a standard.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0078-071	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 19-23 Minnesota already has a station for pets at our reception center and the only way to monitor the pets is with handheld monitors and decontamination is challenging and takes a lot of time. You cannot use the same base timelines for monitoring and decontaminating humans and apply them to pets.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0080-015	Douglas Fleck	Page II-102, Line 1 instructs OROs to include service animals and household pets in determining total EPZ population. While it is possible to get a fairly accurate estimate of service animals through surveys with special needs cards it is not even in the realm of possibility to get an accurate estimate of the potential number of household pets in a given EPZ. No one has yet even managed to define what a household pet is. They can run the gamut from dogs and cats to fish, snakes, turtles, and birds. Many are licensed and many are not. Emergency managers can ill-afford the time that would be wasted trying to meet such a whimsical and fruitless requirement. Recommend household pets not be included in total EPZ population.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0073-039	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-101 – II-102Comment: Lines 32 (p. 101) through 35 (p. 102). Criterion J.12. People are the first priority in any reception center monitoring effort. There are no regulatory standards or limits set for the decontamination of animals. NUREG-0654 does not address Service animals or Household pets. Additionally it is impractical to expect that any state or local agency can accurately know the number of Service animals or household pets at any given time. Potential Impact: Animals are an important part of any family. RECOMMENDATION: DHS/FEMA should work with the United States Department of Agriculture, Nuclear Regulatory Commission, and the Environmental Protection Agency and animal rights/health advocacy groups to standardize how animals are monitored and decontaminated during a radiological emergency. Without such guidance, DOH is not empowered to unilaterally make policy regarding animal health.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0101-039	Florida Division of Emergency Management, Michael Younger	Page II-47, lines 21-23 The issue of pet friendly sheltering and monitoring & decontamination operations is very large in scope. Sufficient time must be allowed for these plans to be developed and exercised as additional memorandums of understanding may need to be developed in situations where host sheltering is required. Additional planning guidance related to animals should be provided prior to OROs being required to implement the related planning.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0090-013	York County Office of Emergency Management, James Welty	Pages II – 101 & 102 Lines 39, 40, 1, & 2: What does "where applicable" mean? If household pets and service animals are included in the total population there is no EPZ that could complete monitoring of 20% of the population in a 12 hour period. How would anyone find these numbers to even begin to plan for this? I would recommend removing "Where applicable, service animals and household pets are also included in the 'Total EPZ population'."	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0128-027a	San Luis Obispo County Office of Emergency Services , Ron Alsop	Service animals are a necessity for a small portion of the public and can be planned for.Household pets are not defined in this document. There is no guidance on the monitoring of household pets and no exposure limits in the EPA PAGs.We recommend studies be performed by the federal government to define the term "household pet", and the impacts including them in population figures. Explanation/recommendation: Remove commuters from outside the EPZ, special facility populations and transients from the calculation and definition of total EPZ population.Remove the inclusion of household pets in the calculation and definition of total EPZ population. Please remove any further references that are based on this definition from the manual.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0117-025	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIC, J.12, page II-102: Where applicable, service animals and household pets are also included in the "Total EPZ population."Comments: Household pets should not be included in the definition of Total EPZ population. Service animals are a necessity for the function of challenged individuals and are a relatively small selection of animals that can be planned for. There is no guidance on the monitoring of household pets, and instructions have not been provided to measure the impact/s of including household pets in the Total EPZ population will have on public safety and emergency worker safety. No rational and/or measurable explanation has been provided for their inclusion. explanation/RecommendatioN: Remove the inclusion of Household pets in the calculation and definition of total EPZ population. Please remove any further references that are based on this definition from the manual. There are no household pet contamination or exposure limits in the EPA PAGs nor is there information regarding the impacts of including household pets in the Total EPZ Population on public and emergency worker safety. Information needed for the methodology for measuring and decontamination of household pet populations.If household pets are to remain add that the OROs "may" include them in the total PAZ calculations and not "will" or "should".	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0080a-014	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-102, Line 1 instructs OROs to include service animals and household pets in determining total EPZ population. While it is possible to get a fairly accurate estimate of service animals through surveys with special needs cards it is not even in the realm of possibility to get an accurate estimate of the potential number of household pets in a given EPZ. No one has yet even managed to define what a household pet is. They can run the gamut from dogs and cats to fish, snakes, turtles, and birds. Many are licensed and many are not. Emergency managers can ill-afford the time that would be wasted trying to meet such a whimsical and fruitless requirement. Recommend household pets not be included in total EPZ population.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0020-037	Ashtabula County EMA, George Rolland	Page Ref. II-102 Comment: Line 1 - what does "where applicable" mean? Also, if service animals and household pets included in 'total EPZ population' the potential exists to more than quadruple the population. Potential Impact: If household pets included in the EPZ population there is no area around a nuclear power plant that could accomplish the monitoring of 20% of the EPZ population within a 12-hour period. How to find the number of household pets to include in the EPZ population? That would be a moving target, 'babies' born every day (kittens/puppies/etc.) Comment by: Locals	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0021-037	Geauga County DES, Dale Wedge	Page Ref. II-102 Comment: Line 1 - what does "where applicable" mean? Also, if service animals and household pets included in 'total EPZ population' the potential exists to more than quadruple the population. Potential Impact: If household pets included in the EPZ population there is no area around a nuclear power plant that could accomplish the monitoring of 20% of the EPZ population within a 12-hour period. How to find the number of household pets to include in the EPZ population? That would be a moving target, 'babies' born every day (kittens/puppies/etc.) Comment by: Locals	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0036-037	Lake County EMA, Larry Greene	Page Ref. II-102 Comment: Line 1 - what does "where applicable" mean? Also, if service animals and household pets included in 'total EPZ population' the potential exists to more than quadruple the population. Potential Impact: If household pets included in the EPZ population there is no area around a nuclear power plant that could accomplish the monitoring of 20% of the EPZ population within a 12-hour period. How to find the number of household pets to include in the EPZ population? That would be a moving target, 'babies' born every day (kittens/puppies/etc.) Comment by: Locals	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-008	Minnesota Homeland Security and Emergency Management , kevin Leuer	The FEMA REP manual is requiring pets to be included into the evacuation planning and if this ends up being required the ETE must be required to include pets in the assessment and evacuation time estimate models.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0116-073	Nuclear Energy Institute, Alex Marion	The notion of including service animals and household pets in the total EPZ population is absurd.Basis – When the animals are counted in the decennial US census, they can be included in total EPZ population.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0100-017	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-102, Line 1 indicates that “where applicable” service animals and household pets are also included in the Total EPZ population. While it is possible to estimate the number and types of service animals within the EPZ by means of surveys, it is considered to be difficult to estimate the potential number and types of household pets within a given EPZ. Although “service animals” are generally permitted within public buildings, the admittance of “household pets” to a shelter may not be permissible due to laws, building use agreements, and ordinances. Therefore, we recommend that this NUREG Criterion (J.12) and theproposed “Explanation” be modified to “consider where appropriate”arrangements for evacuees with household pets. Additionally, OROs withshelters with allowances for evacuees with household pets (such as portablekennels or arrangements with the local Humane Society) should provideappropriate information in appropriate public information materials.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0129-022	Wisconsin Emergency Management, Teri Engelhart	Page: II-102, Line: 1 - 2 Comment: The requirement states that the "Total EPZ Population" includes service animals and household pets (where applicable). This leaves several unanswered questions. What is the definition of household pets? For example, would it be expected that we would include animals at veterinarians and kennels? There is currently no mechanism in place to census pets and it seems as though it would be more logical to make this a voluntary and volunteer run program. Also, it would seem the phrase "where applicable" is implying an exception. Are there exceptions where this planning standard would not apply?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-058	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 When is it applicable to include household pets? When is it not?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0108-089	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102 Line: 1-2 Comment: "Where applicable" is defined in lines 19-21. One is originally left with need to know what "where applicable" means. Either move the sentence on lines 1-2 to the definition, or move the definition.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0073-040	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-102Comment: Lines 1-2. Criterion J.12. While we understand that pets and service animals are important to the evacuees and knowing this information would be good planning information to have, we do not see how it is possible to obtain accurate data on the numbers of services animals and pets within the EPZ without expending a considerable amount of resources.Potential Impact: This places an unreasonable burden on the developer of the ETE. The resources required to gather accurate numbers of service animals and pets would be substantial. Furthermore, the numbers of pets constantly changes, much more so than human population. Since this is a rural area, do we need to gather the same information on livestock? Recommend removing the requirement to include pets and service animals in population figures.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0078-060	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 Using American Veterinary Medical Association formulas, for the State of Minnesota, including dogs and cats will represent a 54% increase to the EPZ populations of both Prairie Island and Monticello.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-061	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 UsingIf the pets are included as the baseline EPZ population then the size and number of reception centers would need to be significantly larger and would result in significant costs to the utilities.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0078-062	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-102, lines 1-2 UsingWith the requirement that 20% of the EPZ population to be processed through monitoring in a 12-hour period, the inclusion of dogs and cats in EPZ populations would alone warrant the addition of 1-4 new reception centers based on this language	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0110-033	Alabama Emergency Management Agency, J Frank Price	page II 102, lines 1-2: Household pets should not be counted in the “Total EPZ population”. The additional count would require increases in evacuations routes number of shelters, sheltering supplies and more. If the census includes the pets as the population then consideration of including pets in the plan.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0097-071	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. 11-102 (lines 1-2: Where applicable, service animals andhousehold pets are also included in the"Total EPZ population."COMMENT: Unrealistic expectation to include pets in the total EPZ population and expect monitoring/decontamination of 20% of that population in 12 hours.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0116-082	Nuclear Energy Institute, Alex Marion	Part II.C, J.12, p. 11-102 (lines 1-2: Where applicable, service animals and household pets are also included in the "Total EPZ population." Part II.C, J.12, p. 11-102 (lines 1-2): Delete statement. Unrealistic expectation to include pets in the total EPZ population and expect monitoring/decontamination of 20% of that population in 12 hours.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0101-061	Florida Division of Emergency Management, Michael Younger	Page II-102, lines 1-2 The inclusion of household pets in the total EPZ population is completely without basis. The household pet population within the EPZ should be counted separate from the human population within the EPZ. There is currently no guidance referenced or cited to incorporate as a planning basis for determining not only the number of household pets in the EPZ but what also constitutes a household pet (such as DAP 9523.19). For OROs that monitor by hand, the health and safety of the general public should not be delayed for monitoring of pets. This is less of an issue for OROs using portal monitors. However, the inclusion of household pets into the 20 percent rule is inappropriate.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0078-064	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 1-2 UsingThe language in reference to monitoring pets needs to be removed until the technology exists to expedite pet monitoring.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0109-038	Ottawa County, Ohio, Koch Beth	page 11-102, lines 1-2: Where applicable, service animals and household pets are also included in the "Total EPZ population."COMMENT - Service animals and pets should not be included in this requirement. It is unrealistic to assume that OROs have the resources to comply.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0120-010	Alabama Emergency Management Agency, La'Tonya Stephens	page II-102, line 1-9 and 18-23 Considering service animals and household pets into the total EPZ will more than double the EPZ population. I do not agree that the same standards for monitoring and decontamination should apply to household and service pets. The time it takes to do the same actions for humans most likely will take more time to do with animals especially being handled by a stranger and if separated from an owner their behavior cannot be predicted and it cannot be assumed that they will cooperate.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0079-015	Delaware Emergency Management Agency, James Turner	Part II Page 102 Issue: Where applicable, service animals and household pets are also included in the Total EPZ population. Basis/Comment: If household pets are included in the EPZ population this action would make it difficult in highly populated EPZs to accomplish the monitoring of 20% of the EPZ population within a 12-hour period. It is difficult to identify the number of household pets in the EPZ population, and there is currently no mechanism within emergency management standards to accomplish this.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0108-090	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102 Line: 18-23 Comment: If household pets are not included in the "Total EPZ Population," then there is no FEMA requirement to monitor the animals if they are brought to a monitoring/decontamination facility. Correct?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0078-067	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 19-23 Additional time and difficulty is involved monitoring animals. If pets are included in EPZ populations this severely impacts the requirement to monitor 20% of this population in 12 hours.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0105-005	Tennessee Emergency Management Agency, Gary Lima	Household pets – Cross contamination is a public health hazard to which enormous effort is made to monitor, separate from and decontaminate evacuees for sheltering. The addition of pets makes critical procedures to mitigate cross contamination untenable. The training, equipment and additional personnel not only add more weight to shelter activities, but will not prevent a potentially contaminated cat, dog, small pig, etc. from getting away from an owner and seeking “shelter” amongst the “clean.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0105-006	Tennessee Emergency Management Agency, Gary Lima	If portal monitors are used – the potential exists for contamination of equipment by pets, thereby endangering the evacuees. If pet monitors are used, how many per unreported number of pets, and by size, weight and definition are being planned for (20% of X without any idea is still X.) What funding streaming will accommodate the number of monitors, personnel and training dollars needed in radiological preparedness for receiving pets to shelters?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0130-018	State of Vermont, Barbara Farr	Page II-103: Where applicable, service animals and household pets are also included in the Total EPZ population.Basic CommentsIf household pets are included in the EPZ population this action would make it difficult to accomplish monitoring 20% of the population within 12 hours. It is difficult to identify the numbers of household pets in the EPZ, and there is no mechanism to accomplish the issues surrounding decon or cross contamination of Emergency Workers and the general population if a pet escapes into the clean zone at registration. Remove “Where applicable, service animals and household pets are also included in the ‘Total EPZ population’”.	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0086-030	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-103, line 1: Comments: The commonly understood intent of Criterion J.12 is to assure adequate resources for the timely monitoring of evacuating persons arriving at relocation centers. The intent appears to have changed to include service animals and pets in the calculation of required monitoring resources. OROs should only be required to make provisions for the management and care of arriving animals, not to count their numbers for meeting the 12- hour monitoring requirement which is intended for people. Inclusion of animals in the total EPZ population should be deleted and instead be replaced by language that clarifies the expectation for proper management and care of animals so as not to impede timely monitoring of people at relocation centers. Service animals and pets need to be accommodated (given temporary care, monitored and decontaminated if necessary) but not within the time requirements needed for evacuees.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0102-039	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-103, Line 1: First comment: Criterion J.12 was established to assure adequate resources for the timely monitoring of persons from evacuated EPZ areas who may be expected to arrive at relocation centers. The original intent appears to have changed to include service animals and pets in the calculation of required monitoring resources. OROs should only be required to make provisions for the management and care of arriving animals, not to count their numbers for meeting the 12-hour monitoring requirement which is intended for people. Inclusion of animals in the total EPZ population should be deleted and instead be replaced by clarifying language that more appropriately states the practical expectation to provide for proper management and care ofanimals in order not to interfere with the timely monitoring of people at relocation centers. Service animals and pets need to be accommodated (given temporary care, monitored and decontaminated if necessary) but should not be subject to the 12-hour time requirement needed for evacuees. Rationale: If taken literally, applying the same 12-hour time requirement to pets and service animals as is currently done for expected evacuees could have a very significant impact on required ORO monitoring resources.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0086-031	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-103, line 7: Also, the phrase "where applicable" with regard to service animals and pets is confusing and should be deleted. It is unlikely that EPZs exist which have no pets or service animals.	Accepted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0106-064	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-103, Line 7Comment: What does "Where Applicable" mean?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0102-040	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-103, Line 7: Second comment: The phrase “where applicable” with regard to service animals and pets should be clarified assuming there are no restrictions for evacuees bringing them.Rationale: If taken literally, applying the same 12-hour time requirement to pets and service animals as is currently done for expected evacuees could have a very significant impact on required ORO monitoring resources.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0073-043	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-103Comment: Lines 13-23. Criterion J.12. Service animals and household pets are outside the purview of the Department of Health (DOH.) DOH recognizes the importance of animals; particularly service animals; however, the mission of DOH is to protect the health and safety of people.Potential Impact: RECOMMENDATION: As mentioned previously, DHS/FEMA and other federal agencies with the specific knowledge regarding animal health need to develop and publish standards for animal decontamination.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

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Criterion J.12	FEMA-2008-0022-0073-078	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-103Comment: Lines 25-31. Criterion J.12. Service animals and household pets present issues regarding registration. The Department of Health (DOH) emphasis at the Reception Center is to ensure that people are cared for.Potential Impact: Registration of people takes precedence over animals in that there are no effective standards regarding pets.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0097-062a	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The notion of including service animals and household pets in the total EPZ population is absurd.BASIS: When the animals are counted in the decennial US census, they can be included in total EPZ population.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
Criterion J.12	FEMA-2008-0022-0108-088	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102 Line: 18 Comment: Replace "disabled" with "special population" or "special needs."	Modified	The REP Program Manual has been amended to replace the term "disabled" with "persons with disabilities and access/functional needs." See the Monitoring subsection within the Explanation Section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0078-066	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-102, lines 19-23 "Should" be monitored in accordance with the same standards or "shall"?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Criterion J.12	FEMA-2008-0022-0108-087	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-101/II-102 Line: 28,36/41 Comment: The "relocation center" is defined as a facility where monitoring, decontamination, registration AND congregate care occurs, "also referred to as congregate care centers." On page B-4, congregate care center is defined as "temporary housing, care and feeding of evacuees." On page B-22, reception center "generally refers to a facility where monitoring, decontamination and registration of evacuees are conducted. A reception center can also be referred to as a "relocation center." There is enough confusion in the manual that these three terms should be defined as complete and separate entities. CCC = CCC, RC = RC, Relocation center = RC + CCC. Pick one definition for "relocation center" so that plans/procedures are consistent through the regions. Until "relocation center" is defined as a single entity, it is difficult to determine what is expected of the State and local agencies for the successful demonstration of this criteria.	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified (See Appendix B - Glossary of REP Terms). There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.
Criterion J.12	FEMA-2008-0022-0129-021	Wisconsin Emergency Management, Teri Engelhart	Page: II-101, Line: 36 Comment: The manual's use of congregate care, relocation center, and reception center terminology is confusing. When reading the manual content it is unclear how these terms interrelate.	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified (See Appendix B - Glossary of REP Terms). There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.

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Criterion J.12	FEMA-2008-0022-0113-069	North Carolina Division of Emergency Management, Stephen Payne	."Page II-101, Line 36RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING:". . . at host areas such as reception (relocation) . . "	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified (See Appendix B - Glossary of REP Terms). There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.
Criterion J.12	FEMA-2008-0022-0112-010	Harford County Division of Emergency Operations, Linda Ploener	All planning standards should remove the American Red Cross references completely. As the ARC has changed it's mandate, many jurisdictions have developed Mass Care plans and procedures utilizing local staff and not the ARC.	Rejected	Because the NUREG-0654/FEMA-REP-1 Planning Standards do not refer to the ARC, there are no references to remove. However, FEMA acknowledges changes in Mass Care protocols and has modified REP Program Manual references to the ARC Sheltering Handbook. FEMA shelter guidance is under development.
Criterion J.12	FEMA-2008-0022-0129-020	Wisconsin Emergency Management, Teri Engelhart	Page: II-101, Line: 29 Comment: Regarding the planning standard above, the statement "within about" is unclear as to the actual time.	Noted	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion J.12	FEMA-2008-0022-0097-062	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion J.12 COMMENT: In "total EPZ population", commuters from outside the EPZ and transients should be excluded. These people have residences outside the EPZ to go to. The only purpose of monitoring at the reception centers is to assure the Red Cross that shelters used byevacuees will not become contaminated.	Rejected	Transient and commuter populations must be counted because of their impact on evacuation routes and monitoring capacity. The purpose of monitoring is to ensure the health and safety of the public.
Criterion J.12	FEMA-2008-0022-0116-072	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion J.12 – In "total EPZ population", commuters from outside the EPZ and transients should be excluded. These people have residences outside the EPZ to go to. The only purpose of monitoring at the reception centers is to assure the Red Cross that shelters used by evacuees will not become contaminated.	Noted	Transient and commuter populations must be counted because of their impact on evacuation routes and monitoring capacity. The purpose of monitoring is to ensure the health and safety of the public.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0128-027	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-101 – 102 (lines 39 – 40, 1-2): Describe means for registering and monitoring of evacuees.COMMENTs: In “total EPZ population”, commuters from outside the EPZ, special facility populations and transients should be excluded. These people have residences outside the EPZ to go to or in the case of special facility populations, will be evacuated to a like facility. The only purpose of monitoring at the reception centers is to assure that shelters used by evacuees will not become contaminated.	Noted	Transient and commuter populations must be counted because of their impact on evacuation routes and monitoring capacity. The purpose of monitoring is to ensure the health and safety of the public.
Criterion J.12	FEMA-2008-0022-0073-038	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-101Comment: Criterion J.12: GENERAL COMMENT: Suggest expanding planning standard J to accommodate this criterion as several separate criteria as opposed to an all-encompassing one.	Noted	FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. FEMA has provided this comment to the NRC for situational awareness.
Criterion J.12	FEMA-2008-0022-0108-091	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102 Line: 34-35 Comment: "Waste water from decontamination operations does not need to be collected." Please confirm this is valid for all monitoring/decontamination facilities and all items decontaminated including persons, vehicles, equipment and other possessions.	Modified	The recommendation that waste water from decontamination operations does not need to be collected is FEMA policy and applies to all REP monitoring/decontamination facilities. See "FEMA Policy Statement on Disposal of Waste Water and Contaminated Products from Decontamination Activities, January 1989". A footnote referencing this memo has also been added to the end of the cited sentence. Waste water from decontamination operations is handled according to the OROs plans/procedures. See the Contamination Control subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0108-092	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102 Line: 37-40 Comment: "While not specifically discussed in NUREG-0654/FEMA-REP-1…" With the addition of NUREG criteria and updates to the criterion to include HAB, HSEEP, etc, NUREG-0654/FEMA-REP-1 is being changed if/when this is promulgated, why not specifically discuss ALARA+ in NUREG now. Either address it as it appears you would like to do, remove the reference to NUREG, or remove the discussion.	Accepted	The cited language has been deleted from the REP Program Manual. The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. See the Decontamination subsection within the Explanation Section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0108-094	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-103 Line: 33 Comment: "While not specifically discussed in NUREG-0654/FEMA-REP-1…" With the addition of NUREG criteria and updates to the criterion to include HAB, HSEEP, etc, NUREG-0654/FEMA-REP-1 is being changed if/when this is promulgated, why not specifically discuss temporary care+ in NUREG now. Either address it as it appears you would like to do, remove the reference to NUREG, or remove the discussion.	Accepted	The cited language has been deleted from the REP Program Manual. The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. See the Decontamination subsection within the Explanation Section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0129-023	Wisconsin Emergency Management, Teri Engelhart	Page: II-103, Line: 33-39 Comment: It is suggested that congregate care centers be available for 20% of the EPZ population. The manual does not consider state boundaries. For example, if the EPZ population has grown dramatically in one state but not the other. How would the 20% planning basis be applied to the state having limited population growth?	Noted	OROs determine an appropriate number and location of congregate care centers based on local population figures and how far evacuees could reasonably be expected to travel. Areas of the EPZ that have higher populations will also have more corresponding congregate care centers.
Criterion J.12	FEMA-2008-0022-0112-007	Harford County Division of Emergency Operations, Linda Ploener	We have concerns regarding “temporary care” and evacuee numbers. What are you looking for here that is different from what we do now? Most jurisdictions have plans and procedures in place for “Mass Care”, whether the need is opening a reception center for monitoring and, perhaps decontamination or for temporary sheltering of residents during/after a disaster. These plans are based on 20% of a given population requiring assistance to 20% of the entire county requiring assistance. Again, what are you looking for? .	Noted	OROs determine an appropriate number and location of congregate care centers based on local population figures and how far evacuees could reasonably be expected to travel. Areas of the EPZ that have higher populations will also have more corresponding congregate care centers.
Criterion J.12	FEMA-2008-0022-0129-019	Wisconsin Emergency Management, Teri Engelhart	Page: II-101, Line: 27 - 37 Comment: The planning standard clearly indicates that "all residents and transients" in the EPZ must be monitored within about a 12 hour period and the explanation of the planning standard clearly indicates that the requirement is 20% of the population. If this is the intent, additional information needs to be included to help clarify the issue. Also see page II-103 line 42-44.	Noted	The full sentence in the criterion says, "all residents and transients in the plume exposure EPZ arriving at relocation centers." The established FEMA planning basis of 20% represents an estimate of the population expected go to a relocation center and is supported by historical statistics on the percentage of the population who arrived at relocation centers during real-life emergencies.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0078-072	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-102, lines 11-12 In Contamination Monitoring Standard Monitor Used for Emergency Response, Sept 1992 standards for monitoring rates with a handheld meter are given. Though approved portal monitor models are listed in this document, no guidance is given for their measuring rates, despite that this should be far more predictable than individual monitoring by hand. It is left up to state or local jurisdictions to decide these monitoring rates: Running two lines and projecting 12 seconds/person will monitor 7200 people in 12 hours; representing 20% of a population, this center would cover an EPZ population of 36,000. Changing that to 20 seconds/person will cover an EPZ population of 21,600; at 30 seconds/person, 14,400. Differences in monitoring time assumptions could result in one state's EPZ having twice the number of reception centers as an EPZ in an adjoining state with a nearly identical population. Standard guidance should be developed that ties the number of reception centers to preset population thresholds.	Noted	OROs use the expected monitoring rate to support planning for an appropriate number of reception centers. OROs may choose to plan for additional reception centers. OROs need to have the appropriate number of reception centers to monitor 20% of the EPZ population in 12 hours according to their plans/procedures. See the bullet list under Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0108-093	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-102/II-103 Line: 15,19,22/22,45 Comment: The document needs to be consistent. Choose one term, define it, then use it throughout the document. On the lines noted, this single criterion uses: "trigger/action levels"; "trigger level"; and "action levels." The glossary defines "action level," but none of the other phrases. Please use "action level(s)" in the document. For other usage of the terminology "trigger level(s)" see: page II-115, lines 36-37; page II-115, footnote 117; and page B-6, line 44. For the usage of the terminology "decision criteria" in relation to contamination/decontamination, see: page II-115, lines 37 and 43; page II-115, footnote 117; page III-48, line 6; and page III-56, line 14.	Modified	The term trigger/action level will be used throughout, and the glossary has been amended. See Appendix B - Glossary of REP Terms.
Criterion J.12	FEMA-2008-0022-0073-041	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-102Comment: Lines 37 (p.102) through lines 11 (p.103). Criterion J.12. DHSIFEMA is correct in that the NUREG does not address specific decontamination policies or procedures. This regulatory "silence" is deliberate in that decontamination efforts can be accomplished in different ways.Potential Impact: In Washington, state and local plans and procedures account for how decontamination efforts will be conducted.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Decontamination is handled according to the OROs plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0073-042	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-102Comment: Line 46-47. Criterion J.12. When decontaminating equipment and vehicles, our experience has shown us that high pressure solid stream tends to spread the water over a much larger area and it is more likely to splash the operator and other nearby objects. We find that when using a standard fire hose, a low velocity fog works better at controlling the spread of contamination.Potential Impact: The methodology would spread the potentially contaminated water over a much larger area. Recommend replace the words "high velocity" with "low velocity."	Modified	The term "low-pressure" has been substituted. See the Decontamination subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0111-023	Illinois Emergency Management Agency, Andrew Velasquez	pages II-l02 through II-104. Again, FEMA is micro-managing and going beyond the planning standard ofNUREG-0654/FEMA-REP-l, Rev. 1 criterion by setting overly prescriptive requirements. What criteria does FEMA suggest for estimating commuters, "anticipated transient populations" and household pets when compiling population estimates? The requirement that plans specify contaminated waste storage and disposal provisions does not fall within the scope of the NUREG-0654/FEMA-REP-l, Rev.1 criterion and certainly there are no provisions under FEMA's jurisdiction. For decontamination, FEMA admits that this area is not specifically addressed in NUREG-0654/FEMA-REP-l, Rev.I, Decontamination should be mentioned in the plan, BUT the procedures and details mentioned in the guidance belong in SOPs/SOGs. Contamination Control and Registration should also be generally mentioned as with most of this criterion guidance, the details should be in SOPs/SOGs and are not appropriate for the plan itself.	Noted	The REP Program Manual has been amended to use the term "plans/procedures" specifically to allow for flexibility. Procedural details may be either incorporated into the main plans or into separate procedural documents, including SOPs/SOGs, at the discretion of the ORO.The REP Program Manual contains guidance on how to meet the intent of the regulations in NUREG-0654/FEMA-REP-1. OROs may propose alternate means for meeting the intent of the regulations as outlined in REP Program Manual Part I, Section D.3.
Criterion J.12	FEMA-2008-0022-0113-072	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-103, LINE 43RECOMMENDATION/COMMENT: ADD ORIGINAL WORDING:Individuals who cannot be decontaminated with simple soap and water washing should be referred to the care of qualified medical or health physics personnel for further evaluation and/or decontamination measures.BASIS:How individuals that cannot be decontaminated are to be handled MUST be addressed.	Noted	The suggested text already exists in the REP Program Manual. These procedures are specified in local plans/procedures.
Criterion J.12	FEMA-2008-0022-0113-070	North Carolina Division of Emergency Management, Stephen Payne	."PAGE II-103, LINE 7 RECOMMENDATION/COMMENT: REPLACE WITH FOLLOWING:"instruments" BASIS:Reference to monitoring kits refers to old Civil Defense nuclear attack response equipment provided in kits (containing both low- and high-level survey instruments). The majority of these kits and instruments have been replaced with more up-to-date instruments.	Rejected	The existing REP Program Manual language is adequate. Use of terms "kit" and the inventory of CDV dosimetry varies across the country and may include other personal protection equipment.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0113-071	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-103, LINE 15 RECOMMENDATION/COMMENT: REPLACE WITH THE FOLLOWING:Contamination Monitoring Standard for A Portal Monitor Used for Radiological Emergency Response, FEMA-REP-21 (March 1995) BASIS:This gives full designation of reference document as in paragraph 1 reference to REP-22.	Rejected	The full document name of FEMA-REP-21 is given when first cited on page II-64, as well as in the references at the end of each criterion in which it is cited. Repeating such reference information would make the document unnecessarily longer.
Criterion J.12	FEMA-2008-0022-0108-095	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-103 Line: 19-23 Comment: We do not provide documentation to people that their vehicle is clean. We provide documentation to people if the vehicle is contaminated, and the vehicle remains onsite. Persons who have cleared monitoring & decontamination: 1) if clean, are provided with a CLEAN stamp on their hand, 2) if decontaminated, are provided with documentation. This section needs to address other philosophies for allowing persons to enter registration and congregate care areas. If this philosophy is the only one FEMA will accept, then please confirm.	Modified	The REP Program Manual has been amended to read as follows: "Individuals found to be clean after monitoring do not need to have their vehicle monitored. These individuals do not require confirmation that their vehicle is free from contamination prior to entering the congregate care center. However, for those individuals found to be contaminated and are then decontaminated, these individuals will have their vehicles monitored and decontaminated (if applicable) and do require confirmation (in accordance with ORO plans and procedures) that their vehicle is free from contamination prior to entering the congregate care center." See the Contamination Control subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0073-079	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP ManualPage Ref.: II-103Comment: Lines 33-39. Criterion J.12. Establishing the location of a reception center in Washington State is the responsibility of the county. The county works with the local chapter of the American Red Cross (ARC) in order to ensure that the reception center meets ARC shelter standards.Potential Impact: RECOMMENDATION: DHS/FEMA needs to assess how effective the current system of reception center and the coordination of additional sheltering facilities function. It is difficult to see how all communities in the absence of a major athletic facility or large university has access to the type of facility considered ideal for this criterion. If one, were to apply ALARA, would it be practical to have a potentially contaminated population traveling to a facility located in the center of a large city? This will vary based on the size of the community and that community's resources. A large, urban city will have many more resources than a small rural city.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Planning for shelter locations, numbers, capabilities, etc., is determined by the ORO.
Criterion J.12	FEMA-2008-0022-0090-014	York County Office of Emergency Management, James Welty	Page II-103, Lines 33-39: Is temporary lodging the same as temporary care? Recommend you standardize terminology. To me temporary care would be the same as a Red Cross Comfort Station while temporary loading would be a Red Cross Shelter.	Modified	No, they are not the same thing. The REP Program Manual has been modified to use the term "congregate care" instead of "temporary lodging" and "temporary care." See the Explanation section of Evaluation Criterion J.10.h in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion J.12	FEMA-2008-0022-0113-074	North Carolina Division of Emergency Management, Stephen Payne	."PAGE II-104, LINE 5RECOMMENDATION/COMMENT: ADD THE FOLLOWING TO END OF SENTENCE:" . . .for this remonitoring."	Modified	The REP Program Manual has been modified with language similar to that suggested. See the Contamination Control subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
Criterion J.12	FEMA-2008-0022-0113-073	North Carolina Division of Emergency Management, Stephen Payne	."PAGE II-104, LINE 1-2 RECOMMENDATION/COMMENT:DELETE BASIS: Statement provides no additional information or support for this sub paragraph.	Noted	Comment cannot be answered because the cited lines do not correspond to appropriate text in the published Federal Register version of the draft REP Program Manual and the intended reference cannot be identified.
Criterion J.12	FEMA-2008-0022-0113-075	North Carolina Division of Emergency Management, Stephen Payne	2PAGE II-104, LINE 27 RECOMMENDATION/COMMENT: ADD ORIGINAL WORDING:"Registration must be conducted after monitoring and decontamination. American Red Cross (ARC) . . ."	Rejected	The term American Red Cross is only used a few times in the REP Program Manual, and consequently has been spelled out each time.
Planning Standard K					
Criterion K.1 (licensee only)					
Criterion K.1 (licensee only)	FEMA-2008-0022-0108-096	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-105 Line: 26 Comment: The licensee is to establish guidelines and have LOAs with ORO EWs if the limits differ from EPA PAGs. Do you expect the OROs to maintain of copy of the LOA and have available for FEMA review? If so, please add an X to both the State and Local.	Noted	Addressing the difference in limits is the licensee's responsibility. The term "agreements" in the cited text does not necessarily refer to a letter of agreement. It may be a process outlined in the plans/procedures. The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a					
Criterion K.3.a	FEMA-2008-0022-0116-083	Nuclear Energy Institute, Alex Marion	Part II.C, Criterion K.3.a – Remove guidance that singles out HAB events. Basis: Offsite responders onsite would be provided for by the licensee's radiation protection program. Additional exposure control supplies for augmented offsite personnel during an HAB event should not be necessary. Although we acknowledge that under traditional REP scenarios (for exercises), the number of responders needing dosimetry and KI – and the levels of radiation to which they may be exposed – has been fairly predictable. But the REP planning for a real event should have addressed the variables described in this section. Too much emphasis on contingency actions for OROs in an HAB event. REP planning should already include contingencies for many of the variables described in this criterion. Mutual aid departments outside the EPZ now have dosimetry/KI and receive annual training (or should). The local EMAs have (or should have) an unassigned amount of dosimetry/KI/survey instruments that can be used during an HAB event.	Rejected	Existing planning for augmented resources responding to a hostile action at a nuclear power plant varies by ORO. The guidance related to HAB incidents is intended to assist OROs that have not yet fully developed these plans.
Criterion K.3.a	FEMA-2008-0022-0097-073	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion K.3.a COMMENT: Remove guidance that singles out HAB events.BASIS: Offsite responders onsite would be provided for by the licensee's radiation protection program. Additional exposure control supplies for augmented offsite personnel during an HAB event should not be necessary. It's true, that under traditional REP scenarios (for exercises), the number of responders needing dosimetry and KI – and the levels of radiation to which they may be exposed – has been fairly predictable. But the REP planning for a real event should have addressed the variables described in this section. Too much emphasis on contingency actions for OROs in an HAB event. REP planning should already include contingencies for many of the variables described in this criterion. Mutual aid departments outside the EPZ now have dosimetry/KI and receive annual training (or should). The local EMAs have (or should have) an unassigned amount of dosimetry/KI/survey instruments that can be used during an HAB event. REP planning and training assures a mechanism for authorization to exceed dose limits and just-in-time training.	Rejected	HAB incidents present unique challenges to OROs, including planning for augmented resources responding on or near the NPP. The guidance related to HAB incidents under Criterion K.3.a is intended to assist OROs that have not yet fully taken these considerations into account in their plans.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0102-034	Entergy Nuclear Operations, Inc., Michael Slobodien	The wording provided in criteria K.3.a and H.10 seems overly prescriptive and should instead require assurance of sufficient additional quantities of KI/dosimetry without specifying exact values. Additional sources and distribution means should be considered by licensees and OROs for HAB events.	Noted	It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion K.3.a	FEMA-2008-0022-0078-073	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-106, lines 21-23 “Evacuation vehicle driver” needs to be defined. If evacuations are done at a SAE for special populations and schools do those drivers of evacuation vehicles need training and dosimeter? If yes then why? This should be specific for evacuation vehicle drivers when a release has occurred and should not apply prior to a release.	Modified	The role of "evacuation vehicle drivers" is defined in ORO plans/procedures. REP Program Manual text has been clarified with examples. See the Definition of Emergency Workers subsection within the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance. See the glossary entry for Emergency Worker in Appendix B - Glossary of REP Terms.
Criterion K.3.a	FEMA-2008-0022-0113-077	North Carolina Division of Emergency Management, Stephen Payne	”PAGE II-107, LINE 32RECOMMENDATION/COMMENT: REPLACE WITH THE FOLLOWING:“Permanent Record Dosimeter (PRD)”	Modified	The acronym "PRD" is defined where first used in Dosimetry subsection within the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance and in Appendix A - Acronyms and Abbreviations Used in the REP Program.
Criterion K.3.a	FEMA-2008-0022-0111-024	Illinois Emergency Management Agency, Andrew Velasquez	page II-106 through II-111. The explanation is not only confusing but also constraining, overly restrictive and adds obligations and criterion beyond that ofNUREG0654/ FEMA-REP-I, Rev.I. On page II-106-07, 2. Dosimeters", it states (Note: all electronic dosimeters are subject to some degree of radio frequency (RF) interference. The amount of RF interference depends on the amount of shielding in the dosimeter design and the frequency range. The electronic dosimeters used in emergency response plans should be tested with any hand-held radios or cellular telephones that may be used by the emergency responders to determine whether the electronic dosimeters will be affected by RF interference)." First, the use of the word "all" at the beginning of the quotation may not be appropriate. Thermo-Electron's Siemens Mk 2.3 was built to military specifications which required that it not be affected at all by "IR" or "RF	Noted	The statement is : "Electronic dosimeters could be subject to some degree of radio frequency (RF) interference."

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0089-001	State of Tennessee Department of Environment and Conservation/ Division of Radiological Health, Bruce House	Page II-107, Line 21-24: Currently, in Tennessee we are less conservative using a factor of 2 for the plume from a gap activity release or less severe release. Our Division feels this restriction will be costly to implement and suggest this be changed to a factor of 2 for Gap Activity Releases or lessor type releases and that a calculation be made for the Early In-Vessel and greater types of releases at the time of the incident.	Noted	Federal Guidance is to use factor of 5, but OROs may elect to be more conservative. OROs may request approval for an alternative approach via the process in REP Program Manual Part I, Section C.3.
Criterion K.3.a	FEMA-2008-0022-0113-076	North Carolina Division of Emergency Management, Stephen Payne	.PAGE II-107, LINE 27 RECOMMENDATION/COMMENT: ADD ORIGINAL WORDING:“Volunteers with emergency duties are also considered emergency workers. Volunteers with emergency duties are also considered emergency workers.”BASIS:Volunteers MUT be addressed due to the large numbers used during response activity.	Rejected	The existing language is adequate. FEMA agrees that voluntary workers are also emergency workers - as explicitly Stated in the first paragraph under the Criterion K.3.a explanation. See also the glossary entry for Emergency Worker.
Criterion K.3.a	FEMA-2008-0022-0108-097	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-107 Line: 34-40 Comment: If emergency worker is guaranteed to be removed from the area if their DRD reads 1R or 5R (dependent upon their duty), does the EW require such a high-range DRD? Could we change from 0-200R to 0-20R? Most functions within our jurisdiction will never be allowed to continue their roles above 5R. And those personnel will never be requested to perform a duty that would exceed 25R. For safety, some functions would have to maintain the higher range DRD. If agreeable, specification and the basis of the selection would be required within plans/procedures. Correct?	Noted	There are no guaranteed situations. Use of high and low DRDs is for life saving mission exposures greater than 25 R.
Criterion K.3.a	FEMA-2008-0022-0113-078	North Carolina Division of Emergency Management, Stephen Payne	”PAGE II-107, LINE 37RECOMMENDATION/COMMENT: REPLACE WITH THE FOLLOWING:“Direct Reading Dosimeters (DRD) 111”	Rejected	The acronym "DRD" is defined where first used in Criterion H.10 and in Appendix A, Abbreviations and Acronyms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0108-098	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-107 Line: 42-47 Comment: Line 43 - "required to have permanent record dosimeters." Lines 45-47 - "Issuance of a permanent record dosimeter… for these EWs is an option." Please review and rephrase.	Modified	The cited sentence has been amended to more clearly convey the intended meaning. It now reads, "Group dosimetry for these EWs is permitted. Group dosimetry is accomplished by issuing a PRD to each individual, then using one or more area DRDs to monitor exposure of the entire group. Group dosimetry is also permitted for EWs assigned to a fixed facility inside the 10-mile EPZ; however, if they are deployed outside the building, including moving to an alternate facility, they must be issued a DRD." See the Dosimeter subsection within the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance
Criterion K.3.a	FEMA-2008-0022-0073-045	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: II-108Comment: Paragraph 3. Criterion K.3.a. Regarding dose control and limits; there needs to be a default/standard turn back value established for emergency workers that is used prior to any dose projection that allows. for the issuance of a dose correction factor. In Washington, for a nuclear power plant emergency this turn back value 2.5 R. This allows the emergency worker to identify the need to retreat to a lower exposure area. 2.5 R is one-half the allowable emergency worker exposure of 5.0 R.Potential Impact: DHS/FEMA has been inconsistent in its evaluations regarding this long-standing emergency worker safety measure. RECOMMENDATION: At the regional level, DHS/FEMA must ensure that evaluators understand the scheme used for emergency worker exposure control. If an emergency worker cannot explain the reason behind the 2.5 R turn around value; that is a training issue. This does not result in the need for the state to change the system used to prevent emergency workers from receiving excessive exposure.	Noted	FEMA evaluates exercise criteria against the information in the ORO plans/procedures.
Criterion K.3.a	FEMA-2008-0022-0113-079	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-108, LINE 13RECOMMENDATION/COMMENT: REPLACE WITH THE FOLLOWING:“total effective dose equivalent (TEDE)	Rejected	The acronym "TEDE" is defined in Criterion J.9 and in Appendix A, Abbreviations and Acronyms.
Criterion K.3.a	FEMA-2008-0022-0113-080	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-108, LINE 13RECOMMENDATION/COMMENT: REPLACE WITH THE FOLLOWING:“Roentgens (R)”	Rejected	The abbreviation "R" is defined the first time it appears in the REP Program Manual, which is in Part I.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0077-008	PA DEP Bureau of Radiation Protection, David Allard	Page II-108, Lines 20-29Comment: Option 1 for controlling TEDE dose is taken from a FEMA Memorandum of July 25, 1994 from Dennis Kwiatkowski, Deputy Associate Director, Preparedness, Training and Exercises Directorate. The wording in the Draft REP Program Manual differs in significant respects from the 1994 document. For example:-- At lines 22-23, the wording of the 1994 document was:"Emergency workers entering the plume *after evacuation of the general public has been completed* will be assigned a predetermined administrative dose limit, *stated in terms of external radiation dose only, that is lower than the maximum TEDE dose recommended by the EPA for the class of emergency response activity to be performed.*"-- At line 27, the wording of the 1994 document was:"(2.) the calculated ratio of external dose to the TEDE. The basis of this calculated ratio will be dose projections provided by the licensee or measurements of the radionuclide mix in the plume."The italics represent wording in the 1994 original that is missing or modified in the Draft REP Program Manual.PA BRP asks that FEMA reproduce language accurately and completely when the Draft REP Program Manual pulls language from longstanding FEMA guidance documents. In this case, PA BRP requests that FEMA use the language for Option 1 found in the original 1994 document. The changes FEMA made in the Draft REP Program Manual in this case materially alter the meaning of the passage, and would require changes in emergency plans where Option 1 had been adopted.	Accepted	The REP Program Manual has been amended as suggested. See the Dose Control and Limits subsection with the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.a	FEMA-2008-0022-0108-099	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-108/II-109 Line: 23-25,37-40/7-9 Comment: "The TEDE calculation for EWs who have taken KI should not include the contribution from thyroid dose due to inhalation of radioiodine." To whom does one submit an alternate option? During an emergency removing the thyroid dose from TEDE calculations has not been identified as a priority. Taking KI, reading dosimetry, surveying and removal from the plume are higher priorities.	Noted	Alternative approaches are submitted to the appropriate Regional office as per REP Program Manual Part I, Section C.3.
Criterion K.3.a	FEMA-2008-0022-0020-038	Ashtabula County EMA, George Rolland	Page Ref. II-109 Comment: Line 20 - The plans/procedures should 'indicate the quantities of dosimetry available'…..The number of dosimeters provided to an agency is based on number of personnel they have at the time dosimetry is being provided; this # changes sometimes weekly/monthly. This seems too prescriptive and would add no value to the plan/procedure. We suggest that only the types of dosimetry be listed. Comment by: Locals	Rejected	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0021-038	Geauga County DES, Dale Wedge	Page Ref. II-109 Comment: Line 20 - The plans/procedures should 'indicate the quantities of dosimetry available'…..The number of dosimeters provided to an agency is based on number of personnel they have at the time dosimetry is being provided; this # changes sometimes weekly/monthly. This seems too prescriptive and would add no value to the plan/procedure. We suggest that only the types of dosimetry be listed. Comment by: Locals	Rejected	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion K.3.a	FEMA-2008-0022-0036-038	Lake County EMA, Larry Greene	Page Ref. II-109 Comment: Line 20 - The plans/procedures should 'indicate the quantities of dosimetry available'…..The number of dosimeters provided to an agency is based on number of personnel they have at the time dosimetry is being provided; this # changes sometimes weekly/monthly. This seems too prescriptive and would add no value to the plan/procedure. We suggest that only the types of dosimetry be listed. Comment by: Locals	Rejected	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion K.3.a	FEMA-2008-0022-0102-035	Entergy Nuclear Operations, Inc., Michael Slobodien	The wording provided in criteria K.3.a and H.10 seems overly prescriptive and should instead require assurance of sufficient additional quantities of KI/dosimetry without specifying exact values. Additional sources and distribution means should be considered by licensees and OROs for HAB events.	Noted	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion K.3.a	FEMA-2008-0022-0108-100	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-109 Line: 42 Comment: Typo - "conduced" should be "conducted."	Accepted	The REP Program Manual has been amended as suggested. See the Dose Control and Limits subsection with the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.a	FEMA-2008-0022-0113-081	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-110, LINE 11ITEM: End of paragraph.RECOMMENDATION/COMMENT: ADD THE FOLLOWING TO END OF SENTENCE:“Each of the above options is considered acceptable. Option 2 appears to offer the best balance of simplicity and flexibility while protecting emergency worker safety.”	Rejected	The existing REP Program Manual language is adequate. All three options are considered acceptable. The commenter's suggestion would imply that FEMA recommends Option 2 over the others.
Criterion K.3.a	FEMA-2008-0022-0108-101	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-110 Line: 16 Comment: Additional supplies may be costly. Dependent upon agency, bids may need to be issued. It may take some time to obtain the necessary supplies. When does FEMA anticipate this requirement will be evaluated in the field?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0113-083	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-111, LINE 26-28 RECOMMENDATION/COMMENT: MOVE STATEMENT:This statement should be moved to the end of line 28 to read as follows:“Some dose limits for certain specialized emergency workers are not high enough to allow responders in an HAB event to be able to continue working in the area without seeking authorization to exceed these limits (which may be time consuming). Processes should allow for just-in-time authorization to exceed dose limits.”BASIS:The possibility of immediate or “just-in-time” authorizations for exceeding dose limits is addressed on page I12 line 5-6 which states “Processes should allow for just-in-time authorization to exceed dose limits.”	Modified	The cited text is in a paragraph discussing procedures for increasing authorized dose limits and will stay there. The term "just-in-time" has been deleted, since all field authorization to exceed limits is by definition "just-in-time." See the Considerations for HAB incidents subsection within the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance
Criterion K.3.a	FEMA-2008-0022-0113-084	North Carolina Division of Emergency Management, Stephen Payne	.”PAGE II-111, LINE 29-32 RECOMMENDATION/COMMENT:While there may be multiple response organizations, if they are responding under a single plan – that plan should specify the exposure limits not the organization.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Organizations may not all be responding under the same plan.
Criterion K.3.a	FEMA-2008-0022-0113-082	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-110, LINE 30-31ITEM: “During response to HAB events, for ORO EWs responding onsite, use of group dosimetry should be supported by an agreement between licensees and OROs.”PAGE II-110, LINE 30-31 RECOMMENDATION/COMMENT:What kind of agreement is be referenced? What is the benefit of such an agreement?	Modified	This is open-ended language and does not require a formal agreement. The intent is to ensure that dosimetry supplies will be adequate. The cited sentence has been amended to read that group dosimetry should be "coordinated with the licensee" instead of "supported by an agreement with the licensee." See the Quantities subsection within the Explanation section of Evaluation Criterion K.3.a in Part II.C - Planning Guidance
Criterion K.3.a	FEMA-2008-0022-0113-085	North Carolina Division of Emergency Management, Stephen Payne	).” PAGE II-111, LINE 34-41 RECOMMENDATION/COMMENT: DELETEBASIS:While good planning ADVICE, this paragraph is too prescriptive in nature. ORO’s should be allowed to use local procurement systems to provide sufficient equipment to accomplish the mission. Maintenance of large stock piles of equipment ties up resources and funds better used in preparation for events and NPP facilities.As written, this paragraph does NOT take into consideration the use of mutual-aid or EMAC to address shortfalls in material. These are accepted emergency management methods to obtain the needed resources for a given situation.	Rejected	The current language in the REP Program Manual is intended to suggest a range of options for ensuring that equipment will be available. As such it does not preclude use of mutual aid or EMAC. Specifically, the language does not identify which organizations should be responsible for equipment maintenance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0121-086	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -110 Line: 34-36 Comments: Methods for estimating the number of potential responders, supplies and equipment, as well as the amount of consumption and loss will be difficult to estimate. This is especially true when pre-planning, considering the numerous types of hostile actions scenarios with various resource requirements. This requirement is unrealistic. It would be better to say that an ORO will rely on in state mutual aid agreements, interstate mutual aid from the Emergency Management Assistance Compact (EMAC) and available aid, resources and supplies from the federal government beyond the immediate capacity of the ORO.	Modified	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion K.3.a	FEMA-2008-0022-0086-022	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Part II: Inserted additional language in K.3.a. Comments: The language used is too prescriptive and rather should be to provide assurance of sufficient additional quantities of KI/dosimetry without being too prescriptive on exact numbers. Additional sources and distribution means should be considered and factored into HAB event planning.	Noted	FEMA recognizes that equipment needs fluctuate with numbers of personnel. It is a best practice for OROs to establish quantities of equipment as a planning basis. In addition, OROs should be inventorying equipment periodically to ensure that quantities on hand are adequate.
Criterion K.3.a	FEMA-2008-0022-0108-102	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-110 Line: 34-36 Comment: FEMA should provide guidance and/or examples of some "acceptable methods for estimating… how much is expected to be lost due to consumption, malfunction, and loss.	Rejected	Methods will be different for each ORO, and will be affected by the population composition around the site (i.e., the number of people who need to respond.)
Criterion K.3.a	FEMA-2008-0022-0121-087	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -110 Line: 45-47 Comments: Even for dosimetry and KI, just in time training may not be possible during a hostile action event when a rapid response may be critical. The assumption is that there will be a minimal amount of time available to provide just in time training. This may be an invalid assumption in many potential scenarios.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. OROs should do their best to provide needed training, but FEMA acknowledges that extreme circumstances may prevent its delivery. See NUREG-0654/FEMA-REP-1 Supplement 4, Part C - Planning and Preparedness for Hostile Action-Based Incidents.
Criterion K.3.a	FEMA-2008-0022-0108-103	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-111 Line: 5-6 Comment: The plan/procedure should include information regarding proper documentation of just-in-time authorization to exceed dose limits.	Modified	A bullet has been added to Criterion K.3.a that says plans/procedures should describe proper documentation of authorization to exceed administrative dose limits. See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.a	FEMA-2008-0022-0020-039	Ashtabula County EMA, George Rolland	Page Ref. II-111 Comment: Line 13 - What is the guidance or where is it written (other than here) that there must be a process for early reading of permanent record dosimeters? Comment by: Locals	Modified	The REP Program Manual has been amended to include the following explanation: Early reading of PRDs is good health physics practice. PRDs should be read when the EWs assignment is completed or as identified in the plans/procedures. If the assignment goes over an extended time, such as field teams, OROs should consider reading PRDs before the completion of the assignment. See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.a	FEMA-2008-0022-0021-039	Geauga County DES, Dale Wedge	Page Ref. II-111 Comment: Line 13 - What is the guidance or where is it written (other than here) that there must be a process for early reading of permanent record dosimeters? Comment by: Locals	Modified	The REP Program Manual has been amended to read "Process for reading PRDs and any early reading of PRDs (e.g., when an EW's task assignment is completed or as otherwise specified)." See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.a	FEMA-2008-0022-0036-039	Lake County EMA, Larry Greene	Page Ref. II-111 Comment: Line 13 - What is the guidance or where is it written (other than here) that there must be a process for early reading of permanent record dosimeters? Comment by: Locals	Modified	The REP Program Manual has been amended to read "Process for reading PRDs and any early reading of PRDs (e.g., when an EW's task assignment is completed or as otherwise specified)." See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.a	FEMA-2008-0022-0079-016	Delaware Emergency Management Agency, James Turner	Part II Page 111 Issue: Early reading of permanent record dosimeters. Basis/Comment: Please indicate guidance or source other than this document, referencing the early reading of permanent dosimeters.	Modified	The REP Program Manual has been amended to read "Process for reading PRDs and any early reading of PRDs (e.g., when an EW's task assignment is completed or as otherwise specified)." See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.b					
Criterion K.3.b	FEMA-2008-0022-0108-104	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-111 Line: 39 Comment: The verbiage "any nuclear accident" should probably be changed. Minimally, it should say "any nuclear power plant accident." However, it would be proper to remove "accident" from the statement and include "event," "incident," or something similar. This criteria should not be limited to an "accident."	Noted	The commenter is citing text in a NUREG-0654/FEMA-REP-1 criterion. Elsewhere in the REP Program Manual, the term "incident" is used. However, changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.
Criterion K.3.b	FEMA-2008-0022-0130-019	State of Vermont, Barbara Farr	Page II-112: Early reading of permanent record dosimetersBasic CommentsPlease cite source document for this other than NUREG 0654. Remove "and early reading of permanent record dosimeters".	Modified	The REP Program Manual has been amended to read "Process for reading PRDs and any early reading of PRDs (e.g., when an EW's task assignment is completed or as otherwise specified)." See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.b	FEMA-2008-0022-0106-065	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-112, Line 19Comment: Why would an agency want to "read permenant record dosimeters" early? What justifies this? Where is the requirement for this?	Modified	The REP Program Manual has been amended to read "Process for reading PRDs and any early reading of PRDs (e.g., when an EW's task assignment is completed or as otherwise specified)." See the bullet list under Evaluation Criterion K.3.a in Part II.C - Planning Guidance.
Criterion K.3.b	FEMA-2008-0022-0108-105	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-112 Line: 20 Comment: Typo - "ff" should be "of."	Accepted	The REP Program Manual has been amended as suggested. See the buller list under Evaluation Criterion K.3.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.3.b	FEMA-2008-0022-0113-086	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-112, LINE 20 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Appropriate reporting if administrative . . ."	Accepted	The REP Program Manual has been amended as suggested. See the buller list of Evaluation Criterion K.3.b in Part II.C - Planning Guidance.
Criterion K.4					
Criterion K.4	FEMA-2008-0022-0108-106	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-113 Line: 32 Comment: Typo - "accumlated" should be "accumulated."	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion K.4 in Part II.C - Planning Guidance.
Criterion K.4	FEMA-2008-0022-0108-107	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-114 Line: 12 Comment: Define "Other 'administrative limits.'"	Modified	The cited text was intended to acknowledge that adminstrative limits may be lower than those specified in Table 2-3 of EPA 400. The REP Program Manual has been modified to remove the word "other" and the quotation marks around "administrative limits." See the bullet list under Evaluation Criterion K.4 in Part II.C - Planning Guidance.
Criterion K.4	FEMA-2008-0022-0113-087	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-115, LINE 17RECOMMENDATION/COMMENT: REWORD AS ORIGINAL:"Licensee X State X Local X "BASIS:NUREG 0654 has this criterion for Licensee's as well as State & Local.	Rejected	The original NUREG-0654/FEMA-REP-1 indicates that Criterion K.4 is applicable only to state and local plans. The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.
Criterion K.5.a					
Criterion K.5.a	FEMA-2008-0022-0108-108	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-114 Line: 40-41 Comment: Please provide guidance or examples on what FEMA expects to see in plans/procedures to "describe trained staff available to perform monitoring and decontamination." For example: number of personnel on the roster to perform monitoring & decontamination; the training the staff has received; type of personnel (i.e., police, fire, volunteer); or some other option.	Noted	See Planning Standard O (Training)
Criterion K.5.a	FEMA-2008-0022-0108-109	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-114 Line: 41 Comment: How does one "describe trained staff available?"	Noted	Training requirements are determined by the ORO and specified in plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.5.a	FEMA-2008-0022-0108-110	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-114 - II-116 Comment: The criterion requires that action levels be specified to determine the need for decontamination. "Action levels" are discussed on page II-115, lines 36-37 and page II-116, lines 2-3 and 11-12. The focus of the Explanation is emergency workers, how to survey EW equipment and vehicles, what portal monitors are used for and other extraneous items. Should the Explanation for K.5.a be concentrated more on "action levels" for each type of survey instrument?	Noted	The term "trigger/action levels" has been applied throughout the REP Program Manual.
Criterion K.5.a	FEMA-2008-0022-0078-015	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-115 Lines 6-8 Operational checks for a hand-held monitor with a probe may include checking the batteries and measuring its response to radiation from an accompanying radioactive check source. Page III-69 Line 28, 29 Before using a monitoring instrument(s), the monitor(s) should demonstrate the process of checking the instrument(s) for proper operation. The above two sections define an operational check for the purposes of decontamination for hand held monitors. Neither definition requires checking the instrument to function within a specific operational range.	Modified	Detailed information on equipment maintenance and operational checks is the Radiological Survey Instruments subsection within the Explanation section of Evaluation Criterion H.10 in Part II.C - Planning Guidance. The REP Program Manual has been modified to include additional clarification under NUREG Criteria I.8 and K.5.a. See the "Field Monitoring Equipment - (4) Field Team Procedures" subsection within the Explanation section of Evaluation Criterion I.8 and the Explanation section of Evaluation Criterion K.5.a in Part II.C - Planning Guidance.
Criterion K.5.a	FEMA-2008-0022-0111-025	Illinois Emergency Management Agency, Andrew Velasquez	Once again this level of detail should not be required. The discussion about what parts of a vehicle to measure do not belong in planning criteria. These are toolbox skills that any radiological monitor should know	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The detailed information provided represents best practices. FEMA feels it is appropriate to include more detailed guidance in highly technical areas.
Criterion K.5.a	FEMA-2008-0022-0108-111	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-115 Line: 35 Comment: "Air cleaner" should probably be "air filter."	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion K.5.a in Part II.C - Planning Guidance.
Criterion K.5.a	FEMA-2008-0022-0113-088	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-115, LINE 37RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Because EWs may be working in areas where they (and their equipment and vehicles) may become contaminated . . .”	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion K.5.a in Part II.C - Planning Guidance.
Criterion K.5.a	FEMA-2008-0022-0113-089	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-116, LINE 13RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“FEMA-REP-21, Contamination Monitoring Standard for a Portal Monitor Used for Radiological Emergency Response (FEMA, March 1995).”	Rejected	The full name of FEMA-REP-21 is given when first cited in Criterion H.10, as well as in the references at the end of each criterion in which it is cited. Repeating such reference information would make the document unnecessarily longer.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion K.5.b					
Criterion K.5.b	FEMA-2008-0022-0108-112	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-116 Line: 36 Comment: There should be a comma between emergency personnel and wounds.	Rejected	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion K.5.b	FEMA-2008-0022-0129-024	Wisconsin Emergency Management, Teri Engelhart	Page: II-116, Line: 36 Comment: What is meant by "radiological decontamination of wounds" of emergency workers, or is this a typo? We need additional clarification of what this means	Noted	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion K.5.b	FEMA-2008-0022-0111-026	Illinois Emergency Management Agency, Andrew Velasquez	Why is this much detail needed? An example of this is to specify that vacuum cleaners with HEPA filters should be used.	Noted	The cited text is just an example to assist with developing plans.
Criterion K.5.b	FEMA-2008-0022-0113-090	North Carolina Division of Emergency Management, Stephen Payne	“PAGE II-117, LINE 3RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“. . . decontaminating EWs and their equipment may be either . . .”BASIS:As written this could be interpreted as a location for only EW personnel. This removes any ambiguity.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion K.5.b in Part II.C - Planning Guidance.
Planning Standard L					
Criterion L.1					
Criterion L.1	FEMA-2008-0022-0108-116	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-120 Comment: Across the county, do hospitals with LOAs with NPPs specify the highest level of contamination that they are willing to treat? If that level is exceeded, what is typically the next step… REAC/TS?	Noted	This level of detail is normally covered in ORO procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion L.1	FEMA-2008-0022-0111-027	Illinois Emergency Management Agency, Andrew Velasquez	Criterion L.I ofNUREG-0654/FEMA-REP-1 applies to "each organization" meaning the licensee as well as the State and local plans. The statement in the first sentence of the first paragraph of the Explanation, "This criterion refers to the arrangement of medical care for the general public, not for members of the Licensee's utility staff." is wrong as well. Licensees are still required to arrange for medical care of on site radiation accident victims	Noted	Medical care of onsite radiation accident victims is addressed in Criterion B.9.
Criterion L.1	FEMA-2008-0022-0073-046	Washington Military Department Emergency Management Division, Jim Mullen	Potential Impact: Blanket comment: Local hospitals and emergency management agencies work together to develop hospital and fire department plans and procedures used to treat a radiologically contaminated patient Department of Health (DOH) provides advice regarding the technical aspects for the fire department and hospital procedures. DOH Health Physicists respond to a radiological emergency at the request of the hospital. DOH personnel follow the hospital radiologically contaminated patient procedure and use health physics practices.	Noted	Comment does not contan specific suggested revisions to the REP Program Manual.
Criterion L.1	FEMA-2008-0022-0119-002	Progress Energy, Kenneth Heffner	FEMA prefers that both the primary and backup facilities and attendant emergency medical transportation services be located [del: at least] approximately 15 to 20 miles from the commercial NPP. Because FEMA recognized that State and local government may not be able to locate both the primary and backup hospital/medical facility at those distances, at least one of the facilities should be great than 15 [del: to 20] miles from the commercial NPP.Basis/CommentCurrent wording is unclear in relation to distance preferred. It is unknown if greater than 15 to 20 miles means at least 15 miles or 20 miles from the site.	Modified	REP Program Manual language in Criterion L.1 has been amended clarify that the preferred distance is a minimum of 5 miles beyond the plume exposure EPZ. See the Explanation section of Evaluation Criterion L.1 in Part II.C - Planning Guidance.
Criterion L.1	FEMA-2008-0022-0108-113	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-120 Line: 17 Comment: Is there a preference for the maximum distance from an NPP?	Noted	The maximum distance from the NPP will be determined by the ORO dependent upon availablity of medical facilities in the area. The intent is to balance avoiding the possibility of evacuating twice with the need to expedite medical care.
Criterion L.1	FEMA-2008-0022-0108-115	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-120 Line: 29,35-37 Comment: Define "technical staff." Is it possible for a LOA to signed with a hospital and have any LOAs with technical staff be between the contract and the hospital?	Modified	Additional LOAs are possible according to hospital procedures. The cited sentence has been deleted. See the Explanation section of Evaluation Criterion L.1 in Part II.C - Planning Guidance

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion L.1	FEMA-2008-0022-0108-114	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-120 Line: 35 Comment: Please list other acceptable accreditation other than JCAHO. What if the available hospital loses it accreditation? If it is a FEMA requirement, how does do we have to located another acceptable facility? Would no accreditation be considered a deficiency, planning issue..?	Noted	The guidance is not requiring a specific accreditation. The reference to accreditation has been deleted.
Criterion L.1	FEMA-2008-0022-0078-076	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-121 Line 13, 14 The language here should be changed by adding trained hospital personnel to this list. The current language is too restrictive if these are the only personnel allowed to do monitoring.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion L.1 in Part II.C - Planning Guidance.
Criterion L.1	FEMA-2008-0022-0121-088	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -122 Line: 12 Comments: States plans and procedures should reference written agreements or LOA's for technical staff not employed by hospital. This could be difficult to achieve as a great number of hospital employees are contract employees.	Modified	Additional LOAs are possible according to hospital procedures. The cited sentence has been deleted. See the Explanation section of Evaluation Criterion L.1 in Part II.C - Planning Guidance
Criterion L.1	FEMA-2008-0022-0108-117	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-122 Line: 14-15,16 Comment: Please definite "radiologically trained medical personnel and support staff" and "support service operations." Does that mean everyone in that facility who has any training whatsoever? Or is this limited to those who would work with a patient through decontamination, including laboratory staff? Or does this extend to CNAs, food services, pharmacy? Please provide more guidance. Do you expect this to be in a table format? Physicians - x, Nurses - y, Janitorial - z...	Noted	Training requirements are determined by the ORO and specified in plans/procedures.
Criterion L.3					
Criterion L.3	FEMA-2008-0022-0121-089	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -123 Line: 2 Comments: States each State should develop lists that identify hospitals capable of treating contaminated injured individuals. What criteria are used to determine if a hospital qualifies?	Noted	The intent of Criterion L.3 is to ensure that OROs have identified backup hospital facilities. OROs need to be aware of facility capabilities so that they do not send individuals to a facility that cannot provide necessary care. The facilities should be within a reasonable distance from the NPP.
Criterion L.3	FEMA-2008-0022-0108-118	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-123 Line: 2-4 Comment: This is highly time consuming. This will need to be reviewed annually in order for it to be certifying the plan as current and accurate. Would it be possible, for NPP purposes, that instead all hospitals statewide, the list to be maintained could be narrowed to distance from the plant?	Noted	The intent of Criterion L.3 is to ensure that OROs have identified backup hospital facilities. OROs need to be aware of facility capabilities so that they do not send individuals to a facility that cannot provide necessary care. The facilities should be within a reasonable distance from the NPP.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion L.4					
Criterion L.4	FEMA-2008-0022-0108-119	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-124 Line: 19-24 Comment: Would you recommend all EMS services that have LOAs with NPPs be required to carry the list from L.3 in every vehicle? Or will their dispatcher maintain this information?	Noted	This level of detail is normally covered in ORO procedures.
Criterion L.4	FEMA-2008-0022-0078-077	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-124 Line 45 The language here should be changed by adding trained hospital personnel to this list. The current language is too restrictive if these are the only personnel allowed to do monitoring.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion L.1 in Part II.C - Planning Guidance.
Criterion L.4	FEMA-2008-0022-0111-028	Illinois Emergency Management Agency, Andrew Velasquez	page II-124 through II-125. The explanation allows monitoring or HP functions to be performed by personnel not assigned to the hospital This is consistent with most utility plans, but contrary to current FEMA expectations for off site medical service providers. In criterion L.I, FEMA indicates the need for hospitals to have "radiologically trained medical personnel available", although "radiologically trained" is not defined. The explanation under the NUREG-0654/FEMA-REP-I criterion as proposed in the draft guidance contains no reference to monitoring capabilities, yet it explains in great detail the need for dosimetry, exposure records, a Radiation Emergency Area designation, and decontamination capabilities. The transportation of victims of radiological incidents/accidents is a local responsibility performed by EMS personnel The procedures for the handling of patients or hospital routine belong to those entities	Noted	Training requirements are determined by the ORO and specified in plans/procedures.
Planning Standard M					
Criterion M.1					
Criterion M.1	FEMA-2008-0022-0121-090	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -128 Line: 5-6 Comments: It should be made clear that the restricted area(s) plus the buffer area(s) equals the restricted zone(s).	Noted	The suggested information should be included in ORO plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion M.1	FEMA-2008-0022-0113-091	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-128, LINE 13-16 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:Since then, revised EPA PAGs have described three phases of an incident: (1) early phase – initial response and protective actions, (2) intermediate phase – continuing response and protective actions to protect the public from deposited radioactivity, and (3) late phase – recovery.BASIS:These three phases are very important and formatting in an outline form emphasizes this importance	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion M.1 in Part II.C - Planning Guidance.
Criterion M.3					
Criterion M.3	FEMA-2008-0022-0108-150	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-129 Line: 27 Comment: The underline by Local needs to be corrected.	Accepted	The typographical error has been corrected as suggested. See Evaluation Criterion M.3 in Part II.C - Planning Guidance.
Criterion M.3	FEMA-2008-0022-0080a-015	Pennsylvania Emergency Management Agency, Douglas Fleck	page II-131 states that exercises will be conducted in accordance with HSEEP. Presently there is much incongruence between HSEEP and the proposed REP Program Manual (Draft) as it is now written. These REP-unique modifications to HSEEP and NIMS are going to accomplish nothing, but create confusion among response agencies that exist to handle a multitude of events and emergencies under an all-hazards concept. REP is only one small and highly unlikely portion of this all-hazards planning effort. As such, it is very counterproductive to expect state emergency managers and first responders to all modify their way of thinking, talking, and doing just for the benefit of one small program in the big picture of things. REP at the federal level has to adapt – not expect the rest of the stake holders to make an exception so that evaluations and plan reviews are easier for a relative handful of federal evaluators.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
Criterion M.3	FEMA-2008-0022-0108-120	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-131/III-34 Line: 3-5/14-16 Comment: Three times, the verbiage "are (will be)" is used. Pick one. Using both, especially three times, is distracting and unnecessary.	Rejected	The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 is beyond the scope of the current REP Program Manual revision. The suggested revision will be noted for consideration, and the REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is amended.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard N					
Criterion N.1.a					
Criterion N.1.a	FEMA-2008-0022-0101-062	Florida Division of Emergency Management, Michael Younger	Page II-131, lines 7-10 As noted in the planning standard interpretation contained in the FEMA RPM, HSPD-8 established the NEP and the use of the HSEEP program. However, inclusion of HSEEP compliance into criterion N.1.a is not appropriate.	Modified	The sentence "Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)" has been replaced with "Exercises shall be conducted as set forth in NRC and FEMA rules and policy." See Evaluation Criterion N.1.a in Part II.C - Planning Guidance.
Criterion N.1.a	FEMA-2008-0022-0065-001	Georgia Environmental Protection Division, Jim Hardeman	Page II-131, lines 7-10: NUREG Criterion N.1.a is misrepresented here. The language here represents how this criterion in NUREG-0654/FEMA-REP-1 would read if NUREG-0654/FEMA-REP-1, Supplement 4 is issued in final without modification. NUREG-0654/FEMA-REP-1, Supplement 4 was issued in draft for review and comment concurrently with the draft Radiological Emergency Preparedness Program Manual – the draft Program Manual, however, makes no reference to Supplement 4, as it does for the “approved” supplements (i.e. 1, 2 and 3). The language in its current form misleads the reviewer, unless he/she is also concurrently reviewing NUREG-0654/FEMA-REP-1, Supplement 4.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercises conducted according to HSEEP					
exercises conducted according to HSEEP	FEMA-2008-0022-0100-018	Pennsylvania Emergency Management Agency, Henry Tamanini	NUREG Criterion N.1.a on page II-131 states that “Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)”.Although this statement appears in the Draft REP Program Manual datedMay 2009, we have not had an opportunity to review the REP ExerciseEvaluation Guides (EEGs). We support the transition of the REP Exercises to the HSEEP methodology.	Noted	The sentence "Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)" has been replaced with "Exercises shall be conducted as set forth in NRC and FEMA rules and policy." Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0102-006	Entergy Nuclear Operations, Inc., Michael Slobodien	Section II b. NEP/HSEEP (Criterion N.1.a) Page 4, Paragraph 5 We suggest that the wording of Evaluation Criterion N.1.a be modified to state: “Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with key principles of the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)”.Rationale: As stated under the REP Program Manual comments below (criterion N.1.a), the net improvement value of this process-driven methodology will depend on how rigorously HSEEP will be required to be implemented. While HSEEP could provide improvements to coordinate the REP exercise process, the additional requirements could become very timeand manpower-intensive if all HSEEP requirements are to be followed verbatim. If sufficient flexibility is not allowed, the imposition of more meetings, process steps, planning and management of improvement items/corrective actions could have a detrimental effect on licensee and ORO REP program effectiveness.	Modified	The sentence "Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)" has been replaced with "Exercises shall be conducted as set forth in NRC and FEMA rules and policy." See Evaluation Criterion N.1.a in Part II.C - Planning Guidance. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0080-016	Douglas Fleck	NUREG Criterion N.1.a on page II-131 states that exercises will be conducted in accordance with HSEEP. Presently there is much incongruence between HSEEP and the proposed REP Program Manual (Draft) as it is now written. These REP-unique modifications to HSEEP and NIMS are going to accomplish nothing, but create confusion among response agencies that exist to handle a multitude of events and emergencies under an all-hazards concept. REP is only one small and highly unlikely portion of this all-hazards planning effort. As such, it is very counterproductive to expect state emergency managers and first responders to all modify their way of thinking, talking, and doing just for the benefit of one small program in the big picture of things. REP at the federal level has to adapt – not expect the rest of the stake holders to make an exception so that evaluations and plan reviews are easier for a relative handful of federal evaluators.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0101-108	Florida Division of Emergency Management, Michael Younger	The sentence “Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)” should be deleted.	Accepted	The sentence "Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)" has been replaced with "Exercises shall be conducted as set forth in NRC and FEMA rules and policy." See Evaluation Criterion N.1.a in Part II.C - Planning Guidance. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0101-107	Florida Division of Emergency Management, Michael Younger	HSPD-8 should be referenced as the basis for integrating HSEEP into the REP program.	Noted	The explanation for Criterion N.1.a refers to HSPD-8 as the basis for integrating HSEEP into the REP program. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
exercises conducted according to HSEEP	FEMA-2008-0022-0118-003	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Attempting to standardize exercise design, conduct, evaluation, and improvement planning across two programs with drastically different purposes and objectives is an exercise in futility. Likewise, attempting to provide a suite of standardized tools for scheduling, planning, information sharing, and evaluation/corrective actions across two programs when one program (REP) has already developed specialized tools and processes out of necessity is likely to reverse progress that has been made to get the program to its current state.We support attempts by FEMA and the NRC to increase standardization of practices within the REP program. However, we believe that forcing integration and standardization of two distinct programs is not in the best interest ofthe citizens of the State of Iowa and will not enhance efforts to ensure the safety and health oflowa's citizens are protected.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0101-091	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (pages 5-6) As noted in the planning standard interpretation contained in the FEMA RPM, HSPD-8 established the NEP and the use of the HSEEP program. However, inclusion of HSEEP compliance into criterion N.1.a is not appropriate. HSPD-8 should be referenced as the basis for integrating HSEEP into the REP program.	Modified	The sentence "Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)" has been replaced with "Exercises shall be conducted as set forth in NRC and FEMA rules and policy." See Evaluation Criterion N.1.a in Part II.C - Planning Guidance. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
exercises conducted according to HSEEP	FEMA-2008-0022-0108-121	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-131 Line: 24 Comment: NEP is used in line 34, please define it here with "National Exercise Program" by adding (NEP).	Modified	The term National Exercise Program is not used many times in the REP Program Manual, so the Manual has been amended to not use the acronym. The term is defined Appendix A, Abbreviations and Acronyms, and Appendix B, Glossary of REP Terms.

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exercises conducted according to HSEEP	FEMA-2008-0022-0116-028	Nuclear Energy Institute, Alex Marion	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to NUREG Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by DHS/FEMA. The DHS/FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.DHS/FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
exercises conducted according to HSEEP	FEMA-2008-0022-0108-122	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-131 Line: 27 Comment: Should probably be "are aligned," instead of "is aligned."	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion N.1.a in Part II.C - Planning Guidance.
exercises conducted according to HSEEP	FEMA-2008-0022-0110-034	Alabama Emergency Management Agency, J Frank Price	page II-131, lines 30-32: Still utilities are not required to use HSEEP this will be conflicting until all responding agencies use HSEEP	Noted	FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

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exercises conducted according to HSEEP	FEMA-2008-0022-0093-006	Texas Department of State Health Services, Bob Free	We support the adoption of HSEEP requirements for an After Actions Review/Post Exercise Debrief meeting. The HSEEP requirement promotes the description of meaningful evaluation findings after required exercise play has been completed. We recommend that, rather than providing very broad remarks regarding exercise findings, that specific information, especially those resulting in negative findings, be mentioned during these briefings. We understand that specific findings resulting in deficiencies are not final until FEMA headquarters is consulted, but specific information which can lead to a negative finding can and should be provided.	Noted	The post-exercise debrief is not the only place potential exercise issues are discussed. FEMA is in constant communication with OROs regarding potential issues discovered during exercises. The REP Program Manual section on Post-exercise Participant Briefings has been amended to read that the "At this stage, the RAC Chair may discuss potential exercise issues, but they should not be made classified as Deficiencies or ARCAs at this time." See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.
exercises conducted according to HSEEP	FEMA-2008-0022-0101-088	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5) 5. With the integration of HSEEP into the REP program, there are now two exercise reports required by Federal regulations that will need to be developed following an exercise: the Federal Standard Exercise Report Form (SERF) and the HSEEP required After Action Report & Corrective Action Plan (AAR/CAP). There are also significant rewrites to existing planning standards that will be reflected in the evaluation criteria such as criteria C.6 and N.1.b.	Noted	The SERF has been superseded by the AAR. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0119-011	Progress Energy, Kenneth Heffner	How will FEMA distinguish between HSEEP and REP objectives in the After Action Reports?	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
exercises conducted according to HSEEP	FEMA-2008-0022-0101-089	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5)Consideration needs to be given to the fact that the SERF is intended for public disclosure. The HSEEP AAR/CAP, while considered a “For Official Use Only” document, may be subject to public disclosure under various states’ public records laws. Such disclosure may pose a security concern due to revealing potential vulnerabilities in ORO plans and procedures, particularly as it relates to HAB exercises.	Modified	The HSEEP AAR is flexible to address varying levels of sensitivity. Provisions to safeguard sensitive information are necessary. REP Program Manual language has been amended to explain this. See Part III.B - REP Exercise Process, Section 6.c Documenting REP Exericises, Developing the After Action Report.
exercises conducted according to HSEEP	FEMA-2008-0022-0129-025	Wisconsin Emergency Management, Teri Engelhart	Page: II-131, Line: 31, Comment: The exercise must "Result in a properly formatted After-Action Report/Improvement Plan." Is this requiring an AAR be done by the State/Locals in additional to the FEMA exercise evaluation report?	Noted	No, FEMA requires only one AAR. However, OROs may choose to develop a separate report or appendices that are not available to the public.
exercises conducted according to HSEEP	FEMA-2008-0022-0101-087	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5)4. The NEP and HSEEP will not reduce exercise fatigue as current exercise requirements dictate what will be demonstrated and when. It is not possible, even with the exercise credit program discussed in the FEMA RPM, to combine exercise requirements into fewer exercises.	Noted	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercises conducted according to HSEEP	FEMA-2008-0022-0101-085	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5) The REP exercise program has become a mature, well refined exercise program and the foundations can be found in the HSEEP program. While HSEEP expands the exercise planning process, it also adds significant time licensee and ORO staff must devote to the design of the exercise.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
exercises conducted according to HSEEP	FEMA-2008-0022-0117-005	California Emergency Management Agency, Elaine Jennings	We support the integration of HSEEP into REP. The integration will ensure consistency across all programs. However, it is important that certain technical proficiencies be exercised and evaluated by qualified individuals at a frequency that will ensure an appropriate level of qualification. These technical proficiencies include but are not limited to dose assessment, PAR creation, and operation of specialized equipment.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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exercises conducted according to HSEEP	FEMA-2008-0022-0108-123	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-131 Line: 40 Comment: It was our understanding the REP exercises were being entered into the National Exercise Schedule. NRC and FEMA attend the regional TOP Conference every year. After that conference, provided there are changes, the should immediately then refer to the schedule to see if there are conflicts. The most likely to conflict is the ingestion pathway, but we schedule 6 years out.	Noted	The cited REP Program Manual text (page III-4, line 9) has been clarified. The following sentence has been added: "Per FY ’05 and FY ’06 Homeland Security Grant Program guidance, State Administrative Agencies are required to schedule all exercises through the NEXS System, so that it can accurately reflect all the exercises (e.g., REP, CSEPP, public health, transit, port security, etc.) occurring throughout the nation.”
exercises conducted according to HSEEP	FEMA-2008-0022-0108-124	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-131 Line: 41 Comment: The REP requirements are the only requirements that need to be utilized during a REP exercise. It is possible if the persons responsible for REP are in a State Emergency Agency and utilizing HSEEP regularly, they may have an interest in adding multiple requirements in. However, if a State Emergency Agency is not the agency responsible for REP exercise planning and coordination with the FEMA Region, the REP agency may only responsible for NUREG-0654 requirements and has no need to "reduce exercise fatigue" in this manner.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
exercises conducted according to HSEEP	FEMA-2008-0022-0020-040	Ashtabula County EMA, George Rolland	Page Ref. II-132 Comment: HSEEP - counties suggest that there must be a long period of integration in order to migrate to the HSEEP process. Comment by: Locals	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4. All FEMA Regions have been authorized to begin using HSEEP in their exercise-building process.

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exercises conducted according to HSEEP	FEMA-2008-0022-0021-040	Geauga County DES, Dale Wedge	Page Ref. II-132 Comment: HSEEP - counties suggest that there must be a long period of integration in order to migrate to the HSEEP process. Comment by: Locals	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4. All FEMA Regions have been authorized to begin using HSEEP in their exercise-building process.
exercises conducted according to HSEEP	FEMA-2008-0022-0036-040	Lake County EMA, Larry Greene	Page Ref. II-132 Comment: HSEEP - counties suggest that there must be a long period of integration in order to migrate to the HSEEP process. Comment by: Locals	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4. All FEMA Regions have been authorized to begin using HSEEP in their exercise-building process.
exercises conducted according to HSEEP	FEMA-2008-0022-0108-125	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-132 Line: 1-3 Comment: Until the TLCs and such have REP integrated into them, the standardized tools will only increase personnel's difficulty of fitting a square into a round hole.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercises conducted according to HSEEP	FEMA-2008-0022-0121-091	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -132 Line: 2-3 Comments: HSEEP integration with the REP Program will add quite a large amount of new required administrative procedures and paperwork. This in itself will require a large commitment in the development of new capabilities.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
exercises conducted according to HSEEP	FEMA-2008-0022-0101-086	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (page 5) 3. With federally evaluated exercise dates negotiated years in advance on a regional basis, the NEP and HSEEP do little to reduce scheduling conflicts.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion N.1.b					
Criterion N.1.b	FEMA-2008-0022-0066-001	Georgia Environmental Protection Division, Jim Hardeman	Page II-132, lines 17-37: NUREG Criterion N.1.b is misrepresented here. The language here represents how this criterion in NUREG-0654/FEMA-REP-1 would read if NUREG-0654/FEMA-REP-1, Supplement 4 is issued in final without modification. NUREG-0654/FEMA-REP-1, Supplement 4 was issued in draft for review and comment concurrently with the draft Radiological Emergency Preparedness Program Manual – the draft Program Manual, however, makes no reference to Supplement 4, as it does for the “approved” supplements (i.e. 1, 2 and 3). The language in its current form misleads the reviewer, unless he/she is also concurrently reviewing NUREG-0654/FEMA-REP-1, Supplement 4.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.1.b	FEMA-2008-0022-0101-069	Florida Division of Emergency Management, Michael Younger	Page II-132, lines 17-37 Revision of criterion N.1.b is not the appropriate place to mandate HSEEP, post exercise critiques, the types of exercises to be conducted or the scenarios that will be used. HSEEP is already addressed by HSPD-8 and the other requirements should be addressed by either FEMA or NRC guidance. Any implementation of any part of 10 CFR 50 should be through appropriate NRC guidance documents. The requirements for licensees to develop, maintain, and implement procedures for notifying appropriate offsite response organizations in a timely manner following the receipt of potential aircraft threat notifications as Noted in 10 CFR 50.54(hh)(1) are already addressed under criterion E.1. The requirements for licensees and OROs to establish procedures for on-site ORO access are addressed in criterion C.6.	Modified	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
Criterion N.1.b	FEMA-2008-0022-0113-092	North Carolina Division of Emergency Management, Stephen Payne	PAGE II-132, LINE 9-10RECOMMENDATION/COMMENT: DELETE BASIS:This is NOT part of NUREG 0654 criteria. It is RECOMMENDED for Supp 4 but has NOT been adopted. This is a recommended methodology for conducting exercises. To insure flexibility and longevity of this criterion, this comment should be made part of the explanation AFTER Supp 4 is finalized.	Modified	The cited text is a NUREG-0654/FEMA-REP-1 Planning Standard. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised. In accordance with HSPD-5, REP must align with the National Response Framework and other National Preparedness Systems, adopt to the changing risks and environment, and provide guidance to OROs on the REP Program in strong cooordination with stakeholders and the NRC.
Criterion N.1.b	FEMA-2008-0022-0101-063	Florida Division of Emergency Management, Michael Younger	Page II-132 – 137 It should be noted (such as in a footnote) that the criterion being promulgated in the RPM comes from the proposed NUREG-0654 Supplement 4 that is concurrently available for comment and is subject to change. This section of the RPM should not be finalized until the criterion it is based on is finalized. Footnote 127 on page II-134 should have been tied to the criterion found on page II-132.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.1.b	FEMA-2008-0022-0101-109	Florida Division of Emergency Management, Michael Younger	The criterion should be revised to read as follows to incorporate the extended exercise cycle Noted above: N.1.b. An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an incident scenario requiring response. The scenario shall be varied such that the major elements of the plans and preparedness organizations are tested within an eight-year exercise planning cycle.	Rejected	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
Criterion N.1.b	FEMA-2008-0022-0113-093	North Carolina Division of Emergency Management, Stephen Payne	."PAGE II-132, LINE 21-22 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Other criteria specified in this Planning Standard and additional detail on how the plans/procedures should address the exercise processes is addressed in Section III. REP Program Exercise Guidance".BASIS:This revision directs the reader to the appropriate section of the discussion of how REP Program exercises are to be fitted into the HSEEP Program. (See next recommendation.)	Rejected	Guidance on the types of exercises and scenario variations should be provided in the context of both plan development (Part II - Planning Guidance) and exercise development (Part III - Exercise Guidance). The REP Program Manual will be revised, however, to ensure consistency across the sections while avoiding excessive duplication.
Criterion N.1.b	FEMA-2008-0022-0113-094	North Carolina Division of Emergency Management, Stephen Payne	.PAGE II-132, LINE 24-41 & Page II-133, Line 1-3RECOMMENDATION/COMMENT: DELETE/RELOCATE BASIS:This information needs to be relocated to the REP Program Exercise Guidance. By relocating, this methodology of conducting exercises can be more readily modified and tailored to meet the needs of the REP program.	Modified	Guidance on the types of exercises and scenario variations should be provided in the context of both plan development (Part II - Planning Guidance) and exercise development (Part III - Exercise Guidance). The REP Program Manual will be revised, however, to ensure consistency across the sections while avoiding excessive duplication.
Criterion N.1.b	FEMA-2008-0022-0113-095	North Carolina Division of Emergency Management, Stephen Payne	.Page II-133, Line 1-3RECOMMENDATION/COMMENT: DELETE BASIS:This information needs to be relocated to the REP Program Exercise Guidance. By relocating, this methodology of conducting exercises can be more readily modified and tailored to meet the needs of the REP program.	Modified	Guidance on the types of exercises and scenario variations should be provided in the context of both plan development (Part II - Planning Guidance) and exercise development (Part III - Exercise Guidance). The REP Program Manual will be revised, however, to ensure consistency across the sections while avoiding excessive duplication.
Criterion N.1.b	FEMA-2008-0022-0073-049	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: II-133Comment: Line 1. Criterion N.1.b. The sentence uses the acronym RPM. We assume that it means REP Program Manual. Appendix A does not have that listed. Recommend either spell out the acronym or list it in Appendix A.Potential Impact: Can cause confusion with readers that might not be familiar with the program.	Accepted	The REP Program Manual has been amended to spell out the cited acronym. See the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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Criterion N.1.b	FEMA-2008-0022-0121-092	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -133 Line: 5 Comments: Refers to "Item 1 below" when it is actually Item 2.	Modified	The introduction to Part III of the REP Program Manual has been rewritten to reflect changes to the body of Part III. The cited item has been deleted. See the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
Criterion N.1.b	FEMA-2008-0022-0121-093	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -133 Line: 5 thru 9 Comments: Refers to the exercise cycle beginning after a date in 1980. This doesn't seem to make sense as the exercise cycle is being revised in 2009.	Noted	The 1980 date cited in the REP Program Manual refers to the effective date of 10 CFR Part 50 Appendix E and establishes the baseline date for each site's exercise cycle, regardless of cycle length.
Criterion N.1.b	FEMA-2008-0022-0101-105	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 11-12) Implementation of any part of 10 CFR 50 should be through appropriate NRC guidance documents. The requirements for licensees to develop, maintain, and implement procedures for notifying appropriate offsite response organizations in a timely manner following the receipt of potential aircraft threat notifications as noted in 10 CFR 50.54(hh)(1) are already addressed under criterion E.1. The requirements for licensees and OROs to establish procedures for on-site ORO access are addressed in criterion C.6.	Noted	The cited text has been deleted from Criteron N.1.b. Comment refers to licensee responsibilities. The items cited by the commenter are included in Supplement 4 because NUREG-0654/FEMA-REP-1 is a joint NRC/FEMA document. However, the related material in the REP Program Manual only elaborates on ORO responsibilities, not requirements directed to licensees. FEMA has provided this comment to the NRC for situational awareness.
Criterion N.1.b	FEMA-2008-0022-0108-126	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-132 Line: 33 Comment: "Integration of offsite resources with onsite response" should be elaborated. Hostile action, explosions, and fire have already been identified. What other options are you seeking, or is this direct reference to ICS?	Noted	REP Program Manual language has been amended for clarity. Regardless of the initiating event, coordination of onsite and offsite resources needs to happen.

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Criterion N.1.b	FEMA-2008-0022-0106-017	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 9Comment: Ref IV.1. Paragraph 2. Eight year cycle and escalated ECL. Evidently this is intended to be a HAB event. However, this once again discusses EOP negotiations. This is a major time consumer of the State, local jurisdictions and the Licensee because FEMA will not talk "directly" with the Licensee. This is based on the old GM-8 which needs to be discarded. FEMA needs to participate face-to-face with the ORO, State and Licensee when developing scenarios and EOP documentation. The number of FEMA evaluators and NRC inspectors has taken a big jump in the last several years while the local jurisdictions and Licensee have cut staffing due to the economy, costs, and profits. "In a real event, the problem may be contained early in the response such that a General Emergency is never, reached, and therefore may not have required an evacuation." Potential Impact: Negotiations need to be conducted face-to-face between FEMA, the State, local jurisdictions and the Licensee to streamline the EOP development process. FEMA's refusal to talk with the Licensee slows the entire process.	Rejected	GM-8 will not be retired because it applies to the FEMA RAC only. The utilities are inseparable from the development and completion of the exercise. FEMA is prohibited from certain direct communications with the utility involved to avoid conflict of interest. However, States may share the draft AAR and other exercise information with the utility. FEMA will maintain constant dialog and communication throughout the implementation of the new guidance in the REP Program Manual.
Criterion N.1.b	FEMA-2008-0022-0093-035	Texas Department of State Health Services, Bob Free	Neither proposed Supplement 4 nor FEMA REP guidance provides information on acceptable methods of meeting this criteria. The additional cost to obtain participation by chemical plants could be excessive. What grant funding will be made available to ORO's to address these non nuclear components of exercise play? What is there to compel participation from DuPont, Southern Pacific, etc? What criteria are there for evaluating those other players? If these non nuclear event responders fail to meet REP Guidance Criteria, does that mean the Utility gets to pay for a drill to correct a deficiency or ARCA?	Noted	Participation by the organizations cited in the comment would be on a voluntary basis. Non-REP participants are not evaluated. FEMA has provided this comment to the NRC for situational awareness.
Criterion N.1.b	FEMA-2008-0022-0131-003	Environmental Monitoring Group, Robert Free	Neither proposed Supplement 4 nor FEMA REP guidance provides information on acceptable methods of meeting this criteria. The additional cost to obtain participation by chemical plants could be excessive. What grant funding will be made available to ORO's to address these non nuclear components of exercise play? What is there to compel participation from DuPont, Southern Pacific, etc? What criteria are there for evaluating those other players? If these non nuclear event responders fail to meet REP Guidance Criteria, does that mean the Utility gets to pay for a drill to correct a deficiency or ARCA?	Noted	Participation by the organizations cited in the comment would be on a voluntary basis. Non-REP participants are not evaluated.

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Criterion N.1.b	FEMA-2008-0022-0106-008	Nebraska Emergency Management Agency, Jonathan Schwarz	The inclusion of a new 8-year HAB cycle in addition to the 6-year biennial evaluation cycle does nothing to preclude predictability and hence pre-conditioning of OROs. The mix of 6-year and 8-year cycles overlaps in regard to the rapid escalation of the ECL. Local jurisdictions DO NOT have dedicated planning staff that could not be used during a drill or exercise to meet HSEEP requirements on dedicated, non-playing exercise planners. Positions in small Nebraska counties are bare-bones with personnel wearing many hats and performing many functions simultaneously.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
…in accordance with HSEEP guidance					
…in accordance with HSEEP guidance	FEMA-2008-0022-0101-104	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 11-12) Revision of criterion N.1.b is not the appropriate place to mandate HSEEP, post-exercise critiques, the types of exercises to be conducted or the scenarios that will be used. HSEEP is already addressed by HSPD-8, and the other requirements should be addressed by either FEMA or NRC guidance.	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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…in accordance with HSEEP guidance	FEMA-2008-0022-0101-106	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 11-12) The criterion should be revised to read as follows: N.1.b. An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an incident scenario requiring response. The scenario shall be varied such that the major elements of the plans and preparedness organizations are tested within a six-year exercise planning cycle.	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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…in accordance with HSEEP guidance	FEMA-2008-0022-0106-066	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-132, Line 7 thru 10NRC/FEMA can not have it both ways. NRC/FEMA rules are regulatory in nature and the outcome of the exercises can carry a penal element. HSEEP on the other hand is a no-fault exercising method.Potential Impact: Telling volunteers who are presently used to the HSEEP process which is a no-fault that they have screwed-up and have to re-demonstrate during a REP exercise will result in the loss these valuable assets.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
…in accordance with HSEEP guidance	FEMA-2008-0022-0079-001	Delaware Emergency Management Agency, James Turner	Issue: Incorporation of HSEEP into REP Basis/Comment: HSEEP is a clear, consistent, industry wide process that REP exercises and programs that should be implemented. This process in nationally utilized for other hazard(s) exercises. HSEEP should be implemented once the standard is approved.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

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…in accordance with HSEEP guidance	FEMA-2008-0022-0105-022	Tennessee Emergency Management Agency, Gary Lima	The adoption of HSEEP, on top of new rule making changes, is of concern that we clearly understand the performance standards necessary to continue an effective program of exercise design; for the purpose testing the viability of our off-site response plans. The affect of applying an All Hazards template without exact REP related elements for evaluated performance does set the stage for exercise failure and not plans testing. Disconnects between HSEEP and REP criteria and the Target Capabilities List are evident and should be addressed first.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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…in accordance with HSEEP guidance	FEMA-2008-0022-0101-092	Florida Division of Emergency Management, Michael Younger	II.b – NEP/HSEEP (pages 5-6) The sentence “Exercises shall be conducted as set forth in NRC and FEMA rules and in accordance with the standardized methodology of the Homeland Security Exercise Evaluation Program (HSEEP)” should be deleted.	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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…in accordance with HSEEP guidance	FEMA-2008-0022-0097-074	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. II-132 (line 20): New requirement, should not be included in REP.	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
…in accordance with HSEEP guidance	FEMA-2008-0022-0101-064	Florida Division of Emergency Management, Michael Younger	Page II-132 – 137 Including HSEEP and other exercise requirements as part of the criterion is unnecessary. These requirements are being developed under other rulemaking by both FEMA and the NRC. Therefore the criterion should read as “An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an incident scenario requiring response. The scenario shall be varied from year to year such that the major elements of the plans and preparedness organizations are tested within a six-year exercise planning cycle.”	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
…in accordance with HSEEP guidance	FEMA-2008-0022-0116-084	Nuclear Energy Institute, Alex Marion	Part II.C, N.1.b, p. II-132 (line 20): “biennial exercise in accordance with HSEEP guidance.” Part II.C, N.1.b, p. II-132 (line 20): New requirement, should not be included in REP.	Modified	Criterion N.1.b has been modified to delete the phrase "in accordance with HSEEP guidance." See Evaluation Criterion N.1.b in Part II.C - Planning Guidance. FEMA is bound by HSPD-8 to integrate HSEEP into REP methodology for exercise scheduling, design, development, conduct, and evaluation. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
…in accordance with HSEEP guidance	FEMA-2008-0022-0086-032	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	N.1.a. Page II-132, line 34: Comments: The impact of this highly process-driven methodology on OROs will depend on how rigorously HSEEP will be required to be implemented. While adoption of HSEEP methodology has the potential to better synchronize and formalize the REP exercise process, the requirements could become very time and manpower-intensive. Even if the State or licensee takes strong ownership of the process, the result will still require more planning and follow-up meetings and management of numerous improvement items/corrective actions by the counties.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
critique of exercises					
critique of exercises	FEMA-2008-0022-0078-010	Minnesota Homeland Security and Emergency Management, kevin Leuer	NUREG-0654 FEMA-REP-1 Rev. 1 Supp. 4 Evaluation Criterion N.1.b Page 11 and 12: The language states that Federal, State, and local personnel shall critique offsite emergency response organization performance in the biennial exercise in accordance with HSEEP guidance. Does this now require the State and Local Jurisdictions to have evaluators for the exercises? Most jurisdictions do not have staff available or qualified to be evaluators fro REP exercises.	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to read, "Exercises will be evaluated as required." Guidance for evaluation of offsite response is found in the explanation for N.4. See NUREG Criteria N.1.b and N.4 in part II.C - Planning Guidance. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. State and Local Jurisdictions are not required to have evaluators for the exercises. Please refer to REP Program Manual Part IV.K - Use of State, Local, and Tribal Personnel as REP Evaluators.
critique of exercises	FEMA-2008-0022-0108-205	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 11 - IV.4 - Will inspectors and evaluators be objective and only observe the critique? Or will they have the capability to write issues/areas of concern that they did not notice/evaluate, but were Noted during the critique? At what time during an exercise do evaluators become observers?	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to read, "Exercises will be evaluated as required." Guidance for evaluation of offsite response is found in the explanation for N.4. See NUREG Criteria N.1.b and N.4 in part II.C - Planning Guidance. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. State and Local Jurisdictions are not required to have evaluators for the exercises. Please refer to REP Program Manual Part IV.K - Use of State, Local, and Tribal Personnel as REP Evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
critique of exercises	FEMA-2008-0022-0129-055	Wisconsin Emergency Management, Teri Engelhart	Page: 5 Line: 5th paragraph Comment: Are state and local personnel going to be used to replace federal evaluators? If that is the intent, OROs will have difficulty fulfilling this obligation due to a limited staffing pool to draw from. Additionally, performing critiques amongst peers and federal evaluators may cause internal discourse and a lack of candor.	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to read, "Exercises will be evaluated as required." Guidance for evaluation of offsite response is found in the explanation for N.4. See NUREG Criteria N.1.b and N.4 in part II.C - Planning Guidance. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. State and Local Jurisdictions are not required to have evaluators for the exercises. Please refer to REP Program Manual Part IV.K - Use of State, Local, and Tribal Personnel as REP Evaluators.
critique of exercises	FEMA-2008-0022-0101-070	Florida Division of Emergency Management, Michael Younger	Page II-132, lines 18-21 These statements should be removed from the criterion and included in the explanation.	Modified	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to read, "Exercises will be evaluated as required." Guidance for evaluation of offsite response is found in the explanation for N.4. See NUREG Criteria N.1.b and N.4 in part II.C - Planning Guidance. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. State and Local Jurisdictions are not required to have evaluators for the exercises. Please refer to REP Program Manual Part IV.K - Use of State, Local, and Tribal Personnel as REP Evaluators.
critique of exercises	FEMA-2008-0022-0093-037	Texas Department of State Health Services, Bob Free	Incorporation of HSEEP requirements as stated in revision to N.1.b appear to be incorrectly characterized. Underlined text states that “Federal, State, and local personnel shall critique offsite emergency response organization performance in the biennial exercise in accordance with HSEEP guidance.” The proposed change continues, “The critique should be conducted in a manner that allows observation by FEMA personnel and NRC inspectors.” HSEEP guidance states that, for operations based exercises (nuclear power plant exercises fit this category): This description conflicts with the proposed changes to N.1.b. The hot wash is conducted in each functional area, similar to the current REP process for each location where exercise criteria are demonstrated. In addition, the debrief, after action meeting or critique (pick a name) is still a requirement under 44CFR 350 as well as current and proposed REP guidance.	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to remove language about critiques and observers. Guidance for evaluation of offsite response is found in the explanation for N.4. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. HSEEP methodology is being integrated into REP evaluations and post-exercise meetings and activities.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
critique of exercises	FEMA-2008-0022-0131-005	Environmental Monitoring Group, Robert Free	Incorporation of HSEEP requirements as stated in revision to N.1.b appear to be incorrectly characterized. Underlined text states that [und: “Federal, State, and local personnel shall critique offsite emergency response organization performance in the biennial exercise in accordance with HSEEP guidance.”] The proposed change continues, [und: “The critique should be conducted in a manner that allows observation by FEMA personnel and NRC inspectors.”]HSEEP guidance states that, for operations based exercises (nuclear power plant exercises fit this category): “A hot wash is conducted in each functional area by that functional area’s controller or evaluator immediately following an exercise, and it allows players the opportunity to provide immediate feedback. A hot wash enables controllers and evaluators to capture events while they remain fresh in players’ minds in order to ascertain players’ level of satisfaction with the exercise and identify any issues, concerns, or proposed improvements. The information gathered during a hot wash can be used during the AAR/IP process, and exercise-specific suggestions can be used to improve future exercises. Hot washes also provide opportunities to distribute Participation Feedback Forms, which solicit suggestions and constructive criticism geared toward enhancing future exercises.”“A debrief is a more formal forum for planners, facilitators, controllers, and evaluators to review and provide feedback on the exercise. It may be held immediately after or within a few days following the exercise. The exercise planning team leader facilitates discussion and allows each person an opportunity to provide an overview of the functional area observed. Discussions are recorded, and identified strengths and areas for improvement and are analyzed for inclusion in the AAR/IP.”This description conflicts with the proposed changes to N.1.b. The hot wash is conducted in each functional area, similar to the current REP process for each location where exercise criteria are demonstrated. In addition, the debrief, after action meeting or critique (pick a name) is still a requirement under 44CFR 350 as well as current and proposed REP guidance.	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to remove language about critiques and observers. Guidance for evaluation of offsite response is found in the explanation for N.4. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. HSEEP methodology is being integrated into REP evaluations and post-exercise meetings and activities.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
critique of exercises	FEMA-2008-0022-0078-012	Minnesota Homeland Security and Emergency Management, kevin Leuer	NUREG-0654 FEMA-REP-1 Rev. 1 Supp. 4 Evaluation Criterion N.1.b Page 11 and 12The language states Federal, State, and local personnel shall critique offsite emergency response organization performance in the biennial exercise in accordance with HSEEP guidance. Why is only off-site required to use HSEEP guidance for evaluation?	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
critique of exercises	FEMA-2008-0022-0058-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The language states that Federal, State, and local personnel shall critique offsite emergency response organization performance in the biennial exercise in accordance with HSEEP guidance. Does this now require the State and Local Jurisdictions to have evaluators for the exercises? Most jurisdictions do not have staff available or qualified to be evaluators.	Noted	Criterion N.1.b has been modified to remove all language about critiques. N.4 has been modified to read, "Exercises will be evaluated as required." Guidance for evaluation of offsite response is found in the explanation for N.4. See NUREG Criteria N.1.b and N.4 in part II.C - Planning Guidance. These changes were made to eliminate ambiguity about the meaning of the words "critique" and "observers" as used in NUREG-0654/FEMA-REP-1. State and Local Jurisdictions are not required to have evaluators for the exercises. Please refer to REP Program Manual Part IV.K - Use of State, Local, and Tribal Personnel as REP Evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
HAB scenarios					
HAB scenarios	FEMA-2008-0022-0110-035	Alabama Emergency Management Agency, J Frank Price	page II-132, lines 17-37: There is still a great deal to be worked on hostile action based exercises before specific information should be required in the REP plan	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
HAB scenarios	FEMA-2008-0022-0101-094	Florida Division of Emergency Management, Michael Younger	III – Planning and Preparedness for HAB Events (pages 6-8) Consideration should be given to removing the requirement that hostile action based drills be conducted for evaluation. Instead, hostile action based drills should be incorporated into the NRC's triennial Force on Force drills as a tabletop exercise. Otherwise, the NRC may be moving into an area that may potentially lead to an evaluation of day-to-day emergency services and tactical law enforcement operations under evaluation criterion C.6.	Modified	During REP plan reviews and exercises, FEMA does not evaluate plans, SOPs/SOGs, or exercise activities not applicable to REP. The adoption of HSEEP methodology does not change this approach. If material applicable to REP is located in all-hazards portions of ORO plans/procedures (e.g., activation of the EOC), then only those applicable portions are subject to REP review. If OROs would like to have non-REP activities evaluated during REP exercises, they must make their own arrangements for appropriate evaluators. See Part I.B - Scope and Part II.C.3, Evaluation Criterion C.6.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
HAB scenarios	FEMA-2008-0022-0119-003	Progress Energy, Kenneth Heffner	It is agreed that exercising the Hostile Action based drill elements are very important for emergency preparedness due to the different challenges associated with an event of that type. The Hostile Action based element should be on that is tested on a prescribed frequency. This element however, should be allowed to be tested or demonstrated outside of the evaluated biennial exercise (i.e., after hours exercised, etc.) cycle as other required elements are. Testing of that element during an evaluated exercise is not necessary and further results in the negative training that the industry and regulators have been discussing for several years. Licensees and OROs have demonstrated their willingness to voluntarily exercise this element as part of the HAB drill process over the last three years. The testing of the HAB element can still be conducted within the 8 year period, but would be better suited to be completed outside of the evaluation cycle. It would be exceedingly difficult to maintain confidentiality while developing and planning for a HAB scenario during the biennial exercise process due to the varying agencies involved. The lower profile drills outside of the evaluated exercise cycle would be more conducive to confidentiality. After years of "worse case" scenarios and stepping through emergency classifications to a General Emergency, the HAB drill will result in similar negative training and perception that has hindered ORO decision-making in actual, much less serious events (local schools being evacuated at an Unusual Events, etc). Licensees and ORO can effectively test and exercise the HAB element to prevent the need for covering extremely unlikely events during post exercise public meetings and critiques. Adding yet another very unlikely scenario to the exercise cycle, is contradictory to the effort to develop more realistic and varied scenarios.	Rejected	Use of the HAB scenario variation remains a requirement. However, it may be combined with other scenario variables to decrease predictability.
HAB scenarios	FEMA-2008-0022-0078-003	Minnesota Homeland Security and Emergency Management , kevin Leuer	The current security exercises and plans (like force-on-force) that are being done at the plants are being conducted outside the context of the emergency classification level that would be declared at the plant based on the events that are occurring and are not integrated with the overall off-site response plans. Therefore, the responders are being trained as if there are no other functions that they would be doing at that time and only focusing on the security event and not the overall response. Many of the security drills are only involving law enforcement and are not taking into consideration all of the off-site activities that would be needed at the same time the on-site response is occurring based on the ECL.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. REP exercises conducted using an HAB incident as the initiating event are designed to test integrated response to both the security and radiological concerns.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
HAB scenarios	FEMA-2008-0022-0108-132	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-136 Line: 34 Comment: It is noted that "consecutive "no release" HAB scenarios should not occur." Is this a "should not" or a "shall not?"	Noted	The REP Program Manual has been amended to state that consecutive no release HAB scenarios "shall not" be used. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. In the REP Program Manual text, "shall," "should," "must," and "will" denote requirements. "Recommend" and "suggest" denote Federally-approved means for meeting the intent of NUREG-0654/FEMA-REP-1. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The entire REP Program Manual has been reviewed for consistent use of these terms.
no/minimal release scenarios					
no/minimal release scenarios	FEMA-2008-0022-0093-033	Texas Department of State Health Services, Bob Free	How can the ORO's demonstrate that they follow their plans AND meet all the criteria if there's no General Emergency? According to the plans, each level mandates certain responses and response beyond what that level requires would get an ARCA or similar if an ORO went beyond the plan for that level.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0101-101	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 8-12) In order to demonstrate reasonable assurance that the health and safety of the public can be protected, exercise scenarios must drive ORO play sufficiently to meet their objectives. With most protective actions to protect the public occurring at a general emergency (as that is the classification that offsite consequences are expected) any exercise that does not result in those actions being necessary essentially would become a table top exercise to discuss those processes.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0101-066	Florida Division of Emergency Management, Michael Younger	In order to demonstrate reasonable assurance that the health and safety of the public can be protected, exercise scenarios must drive ORO play sufficiently to meet their objectives. With most protective actions to protect the public occurring at a general emergency (as that is the classification that offsite consequences are expected) any exercise that does not result in those actions being necessary essentially would become a table top exercise to discuss those processes.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0105-013	Tennessee Emergency Management Agency, Gary Lima	It is not possible to evaluate the full exercise of a plan for a Protective Action Decision involving REP, without arriving at a General Emergency Classification.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0121-001	Utility Radiological Safety Board of Ohio, Nancy Dragani	FEMA exercise criterion and frequency have appeared to remain the same; however, there are several proposed changes to exercises such as "no release" and no declaration of a general emergency. How will the actions related to PAR's and field measurements be evaluated during each biennial exercise?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0093-034	Texas Department of State Health Services, Bob Free	For those exercises with no or minimal release, we assume we could mobilize a reduced cadre of staff? Surely FEMA is not suggesting that we mobilize staff intentionally just to sit around for 2 days? We have the real business of protecting public health to do if we're not needed at an exercise. Not to mention the waste of public monies.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0095-008	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	scenarios that do not have an associated radiological release will be problematic. State, county or local organizations responsible for radiological assessment and monitoring will be unable to meet their goals and objectives without a radiological plume. This will require either out of sequence, offline demonstration of those capabilities or exercises with facility disconnects with numerous controller injects and interventions. This is not consistent with the realism that FEMA is striving to achieve. History has shown that more controller intervention means more confusion that is beyond the control of the player and detracts from both realism and training opportunities. Further, increases in the amount of out of sequence demonstrations place unnecessary burdens, both from a resource and financial perspective, on state, county and local organizations	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0098-008	Kansas Department of Health and Environment, Thomas Conley	scenarios that do not have an associated radiological release will be problematic. State, county or local organizations responsible for radiological assessment and monitoring will be unable to meet their goals and objectives without a radiological plume. This will require either out of sequence, offline demonstration of those capabilities or exercises with facility disconnects with numerous controller injects and interventions. This is not consistent with the realism that FEMA is striving to achieve. History has shown that more controller intervention means more confusion that is beyond the control of the player and detracts from both realism and training opportunities. Further, increases in the amount of out of sequence demonstrations place unnecessary burdens, both from a resource and financial perspective, on state, countyand local organizations.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0131-001	Environmental Monitoring Group, Robert Free	How can the ORO's demonstrate that they follow their plans AND meet all the criteria if there's no General Emergency? According to the plans, each level mandates certain responses and response beyond what that level requires would get an ARCA or similar if an ORO went beyond the plan for that level.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0131-002	Environmental Monitoring Group, Robert Free	For those exercises with no or minimal release, we assume we could mobilize a reduced cadre of staff? Surely FEMA is not suggesting that we mobilize staff intentionally just to sit around for 2 days? We have the real business of protecting public health to do if we're not needed at an exercise. Not to mention the waste of public monies.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0126-001	Pilgrim Watch, Mary Lampert	Exercises are meant to identify weaknesses in planning so that they can be fixed before a real emergency occurs. The net effect of this draft change would be that 1/3 of the exercise scenarios in a (6 year) cycle would not test offsite response in a radiological disaster. This violates a basic planning principle that if responders are trained and prepared for a serious type of emergency than they will be prepared and trained for a scenario involving no radiological release or a "minimal radiological release that does not require public protective actions" but it does NOT work the other way around. Just as, if college math students are tested simply on simple addition and subtraction problems, their scores will not be indicative of how well they are prepared to meet the challenges presented in a job requiring advanced math skills.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0126-002	Pilgrim Watch, Mary Lampert	The option of a “no release” scenario should be deleted	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0112-003	Harford County Division of Emergency Operations, Linda Ploener	Language indicates some scenarios might include minimal radiological release below protective action thresholds – if this is the case, beyond discussion of the incident, a PAR might not be appropriate which, in turn, would end the exercise.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0122-003	Emergency Management and Homeland Security Division , James Porcello	The "'exercise without a release" option creates problems related to the ability to demonstrate all of the required exercise criteria within the six year cycle. In essence, FEMA's REP program requires a "capstone" exercise every two years rather then the five year HSEEP cycle. As discussed in #1 above, using the HSEEP cycle would result in more frequent and meaningful exercises for the OROs.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0106-024	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact: No release or minimal release options would allow OROs to perform routine duties in their local jurisdictions. This is the job they are really paid to perform. Emergency Management duties are practiced in State and Regional exercises or performed in response to real "all-hazard" events that require real action.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0072-003	Anonymous	Also, what is all the talk about the on-site folks winning? These REP exercises were intended to evaluate off-site emergency response. If on-site wins and there is no required PAR, then most of the required off-site demonstration for several criterion goes away. I noticed though that the frequency of demonstration for those criterion has not changed so does this now require development of several drills to ensure the criteria are demonstrated? It would seem to me that requiring a minimum of a General Emergency (even with no release, due to plant conditions), would have been good.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0108-129	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-132/II-135/II-136 Line: 27-28/1-4, 47-48;1-5 Comment: Our FEMA region requires doses to be high enough for 1) offsite PAD, 2) ANS/EAS activation, 3) KI discussions, 4) dose projections, 5) field team measurements, and 6) demonstration of all requirements. Many of these requirements are due with every exercise. If we have no release or release requiring no offsite PADs, how does FEMA intend for States to demonstrate requirements. Will we be required to demonstrate items through "discussion" or "out of sequence" or what?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0097-003	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Pre-conditioned response by local jurisdictions has been driven by unrealistic scenarios required by NRC/FEMA in order to exercise the full Offsite Response Organization (ORO). Approximately 30 years of negative conditioning by the NRC/FEMA always requiring exercises to go beyond reasonable/logical potential release scenarios to a mandatory GENERAL EMERGENCY (GE) is the cause of this pre-conditioning. Since the incident at Three Mile Island there has not been a GE in the entire U.S. nuclear industry. The REP program must allow for a more realistic and objective driven scenario that allows OROs to adequately demonstrate their emergency response capabilities without requiring the predictability of a worst-case scenario.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0130-021	State of Vermont, Barbara Farr	Part II page 135: No release.Basic CommentsIf there is no GE classification, not all criteria would be demonstrated. Evaluation of criteria in the Extent of Play must be modified.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0101-067	Florida Division of Emergency Management, Michael Younger	The four emergency classifications are intended to be reflective of the progression of the emergency event. If FEMA and the NRC intend to have exercises begin at a site area emergency or rapidly escalate to a site area emergency, then there needs to be a technical basis for implementing such a requirement outside of a hostile action situation. Otherwise, this is an unnecessary requirement. The more realistic approach is to haveexercises that start at an alert, as these are the typical initiating conditions that can lead to further degradation of plant conditions.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0079-017	Delaware Emergency Management Agency, James Turner	Part II Page 135 Issue: Reaching the General Emergency is not required, provided that OROs adequately demonstrate all appropriate biennial criteria. Basis/Comment: If there is no General Emergency classification not all appropriate biennial criteria would be demonstrated (no PARS/PADS). Evaluation of criteria in the original document must be then modified.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0110-036	Alabama Emergency Management Agency, J Frank Price	page II-135, lines 11-21: To demonstrate the plan and meet the entire criterion a GE must happen. Only if the program is change to HSEEP will proper demonstration of response to an actual event without precondition	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0119-007	Progress Energy, Kenneth Heffner	Regarding the statement about initial PARs. Initial PARs should be primarily based on plant conditions as a primary source of PAR information. It is well known that radiological assessment in the early/plume phase of an event has several, uncertainties associated with it. Plant conditions should e the initial/primary driver of PARs and be supplemented by radiological assessment.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0117-009	California Emergency Management Agency, Elaine Jennings	We generally support the proposed concepts that allow flexibility and variability in exercises. However, it is important to maintain requirement to demonstrate certain technical skill sets during exercises such as dose assessment, specialized equipment operation, PAR generation, etc. The demonstration of these skills may not be required if ECL's are skipped, ANS is not required, or there is no simulated offsite radiological release.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0128-006	San Luis Obispo County Office of Emergency Services , Ron Alsop	The new requirements in the REP manual regarding scenario variation lessen required demonstration levels. Without the continued demonstration of PAR, PAD, PAI, and ANS the Utility, State, and Locals will no longer perform the same level of demonstrations for FEMA/NRC that they were required to do in the prior REP manual. The inclusion of other "all hazards" initiating events is a colorful example of no value added as the OROs must still PAR, PAD, PAI, and ANS. Even the table in Exhibit III-2 contradicts the narrative in this section still requiring the PAD process in every evaluation. Explanation/Recomendation: FEMA and the NRC must recognize that the reduction in demonstration over the six year cycle will result in less demonstration of all the criteria for the ORO.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0020-041	Ashtabula County EMA, George Rolland	Page Ref. II - 135 Comment: Lines 31/32 - OROs cannot adequately demonstrate all appropriate biennial criteria if no GE classification (no PARs/PADS). Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0021-041	Geauga County DES, Dale Wedge	Page Ref. II - 135 Comment: Lines 31/32 - OROs cannot adequately demonstrate all appropriate biennial criteria if no GE classification (no PARs/PADS). Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0036-041	Lake County EMA, Larry Greene	Page Ref. II - 135 Comment: Lines 31/32 - OROs cannot adequately demonstrate all appropriate biennial criteria if no GE classification (no PARs/PADS). Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0073-051	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: II-135Comment: Lines 31-32. Criterion N.1.b. OROs cannot adequately demonstrate all appropriate biennial criteria if there is no release. This asks the question that if a jurisdiction discusses the situation and decides that there is no threat to their citizens then elects to do nothing; does this meet the exercise objective?Potential Impact: Places an questionable burden on the exercise planners and participants. Does discussing the situation and deciding not to do anything equate to making a decision? Recommend modifying the criterion to allow satisfactory completion of the objective if the discussions are conducted and based upon the situation, a decision is made not to take any protective action.Comment By: State/Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0080-019	Douglas Fleck	Page II-135, Lines 31 and 32 states that it is not required to reach General Emergency provided OROs adequately demonstrate all appropriate biennial criteria. This is simply not possible. Without reaching GE there would be no way for OROs to be graded on their ability to determine a PAD or KI decision. Grading their ability to send out appropriate EAS messages and news releases would be severely curtailed. Little material would be available for evaluating rumor control. In order to meet all of these criteria a much larger out of sequence portion would have to be introduced to the exercise. This is very unrealistic. While it may be a great idea and realistic to have the plant resolve the problem prior to GE it is not good for the OROs and their evaluations. Perhaps the termination prior to GE scenarios should be reserved for evaluations in which only the power plant plays. Recommend that biennial exercise scenarios continue to have a General Emergency declaration	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0090-016	York County Office of Emergency Management, James Welty	Page II-135, Lines 31-32: ORO cannot demonstrate all criteria if GE is not reached. There are no PARs or PADS.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0097-075	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. II-135 (lines 31-32):COMMENT: The only way to demonstrate all appropriate biennial criteria without a GE is by Controller injects; and that has the potential to cause confusion among the OROs and result in findings unnecessarily.BASIS: OROs cannot adequately demonstrate all appropriate biennial criteria if no GEclassification (e.g., no PARs/PADs).	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0100-021	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-135, Lines 31 and 32 state "Reaching General Emergency is not required provided that OROs adequately demonstrate all appropriate biennial criteria." We believe that this is possible; however, additional guidance is required with regard to the construction of the additional scenario components or "out-ofsequence" activities in order to meet all of the Protective Action Decision criteria and demonstrations. We are optimistic that the HSEEP Exercise Evaluation Guidelines will address these requirements.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0116-085	Nuclear Energy Institute, Alex Marion	Part II.C, N.1.b, p. II-135 (lines 31-32): However, reaching the General Emergency is not required, provided that OROs adequately demonstrate all appropriate biennial criteria. Part II.C, N.1.b, p. II-135 (lines 31-32): The only way to demonstrate all appropriate biennial criteria without a GE is by Controller injects; and that has the potential to cause confusion among the OROs and result in findings unnecessarily.Basis: OROs cannot adequately demonstrate all appropriate biennial criteria if no GE classification (e.g., no PARs/PADs).	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0080a-018	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-135, Lines 31 and 32 states that it is not required to reach General Emergency provided OROs adequately demonstrate all appropriate biennial criteria. This is simply not possible. Without reaching GE there would be no way for OROs to be graded on their ability to determine a PAD or KI decision. Grading their ability to send out appropriate EAS messages and news releases would be severely curtailed. Little material would be available for evaluating rumor control. In order to meet all of these criteria a much larger out of sequence portion would have to be introduced to the exercise. This is very unrealistic. While it may be a great idea and realistic to have the plant resolve the problem prior to GE it is not good for the OROs and their evaluations. Perhaps the termination prior to GE scenarios should be reserved for evaluations in which only the power plant plays. Recommend that biennial exercise scenarios continue to have a General Emergency declaration.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0128-029	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-135, (lines 31-32: However, reaching the General Emergency is not required, provided that OROs adequately demonstrate all appropriate biennial criteria.COMMENTs: The only way to demonstrate all appropriate biennial criteria without a GE is by Controller injects; which could cause confusion among the OROs and result in findings unnecessarily. OROs cannot adequately demonstrate all appropriate biennial criteria if no GE classification (e.g., no PARs/PADs).Explanation/recommendation :Modify this guidance to be consistent with intent of allowing for one exercise per cycle to help limit anticipatory responses.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0109-039	Ottawa County, Ohio, Koch Beth	page II-135, lines 31-32: However, reaching the General Emergency is not required, provided that OROs adequately demonstrate all appropriate biennial criteria.COMMENT - OROs can not demonstrate all biennial criteria without a GE declaration.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0109-040	Ottawa County, Ohio, Koch Beth	page II-135 & II-136 (lines 46-48 & 1-2): Licensee, State, and local agencies must demonstrate a full range of protective actions for all jurisdictions within the Plume Exposure Pathway EPZ in the 6-year exercise cycle. A scenario involving no radiological release or an unplanned minimal radiological release that does not require offsite protective actions shall be utilized in one biennial exercise per exercise cycle to limit anticipatory responses based on the expectation that every exercise will result in a radiological release.COMMENT - If there is no release and/or no offsite protective actions, core objectives must be modified to reflect less frequent demonstrations of certain criterion.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0097-076	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	p. II-135 & II-136 (lines 46-48 & 1-2): COMMENT: Seems contradictory. A coreobjective of every exercise isANS, which is utilized for PARs,PADs & EAS. If no offsiteprotective actions, then no PARs,PADs & EAS.BASIS: The Evaluation Area and Sub-Elements in Part III still says must be demonstrated in Every Exercise.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0116-086	Nuclear Energy Institute, Alex Marion	A scenario involving no radiological release or an unplanned minimal radiological release that does not require offsite protective actions shall be utilized in one biennial exercise per exercise cycle to limit anticipatory responses based on the expectation that every exercise will result in a radiological release. Page II.C, N.1.b, p. II-135 & II-136 (lines 46-48 & 1-2): Seems contradictory. A core objective of every exercise is ANS, which is utilized for PARs, PADs & EAS. If no offsite protective actions, then no PARs, PADs & EAS. Basis: The Evaluation Area and Sub-Elements in Part III still says must be demonstrated in Every Exercise.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0128-030	San Luis Obispo County Office of Emergency Services , Ron Alsop	page II-135 & II-136, lines 46-48 & 1-2: Licensee, State, and local agencies must demonstrate a full range of protective actions for all jurisdictions within the Plume Exposure Pathway EPZ in the 6-year exercise cycle. A scenario involving no radiological release or an unplanned minimal radiological release that does not require offsite protective actions shall be utilized in one biennial exercise per exercise cycle to limit anticipatory responses based on the expectation that every exercise will result in a radiological release.COMMENTsContradicts lines 31 -32 that state ORO's must adequately demonstrate all appropriate biennial criteria. The Evaluation Area and Sub-Elements in Part III still says must be demonstrated in Every Exercise.Explanation/recommendationModify this guidance and Evaluation Area and Sub- Elements to be consistent with intent of allowing for one exercise per cycle to help limit anticipatory responses.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0078-080	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-135 Line 47 If we are requiring a “no release” scenario why would it be a required radiological emergency exercise?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0078-081	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-135 Line 47 If this scenario requires no offsite public protective actions then in Minnesota we cannot go above an ALERT ECL because at Site Area Emergency students within the EPZ are transported to a sister school and the Department of Agriculture issues a livestock advisory. As these are both public protective actions, such a scenario, as required, could not advance past Alert ECL.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0078-082	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-135 Line 47 It would be difficult, if not impossible to complete all of our demonstration criteria (Field Teams, Reception Center, Evacuation of Schools etc.) if the exercises were stopped at an ALERT ECL.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0020-042	Ashtabula County EMA, George Rolland	Page Ref. II-135 Comment: Lines 47/48 & 1/2 and 33/34 of next page - if no release and no ORO PARs then offsite will not be able to demonstrate all 'appropriate biennial criteria". Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0021-042	Geauga County DES, Dale Wedge	Page Ref. II-135 Comment: Lines 47/48 & 1/2 and 33/34 of next page - if no release and no ORO PARs then offsite will not be able to demonstrate all 'appropriate biennial criteria". Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0036-042	Lake County EMA, Larry Greene	Page Ref. II-135 Comment: Lines 47/48 & 1/2 and 33/34 of next page - if no release and no ORO PARs then offsite will not be able to demonstrate all 'appropriate biennial criteria". Comment by: Locals	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0079-018	Delaware Emergency Management Agency, James Turner	Part II Page 135 Issue: No release Basis/Comment: If there is no release not all appropriate biennial criteria could be demonstrated (no PARS/PADS). See above statement	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0090-017	York County Office of Emergency Management, James Welty	Page II-153 and 136, Lines 47, 48, 1, 2: ORO cannot demonstrate all criteria if there is no release. There are no PARs or PADS.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0078-009	Minnesota Homeland Security and Emergency Management , kevin Leuer	NUREG-0654 FEMA-REP-1 Rev. 1 Supp. 4, page 11 An HAB exercise can coincide with either a release scenario or "no release" scenario… Comments If there is no radiological release then the exercise is simply a hostile action exercise and does not vary from many of the other types of hostile action/terrorism based exercises that are done on an ongoing basis and does not belong in a Radiological Emergency Response program requirement. If we are requiring exercises without a radiological release isn't that going beyond the scoop and the intent of the radiological emergency planning doctrine and wouldn't the exercises simple be a security exercise and then should not be evaluated by a radiological response doctrine?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0126-003	Pilgrim Watch, Mary Lampert	The fact that the Draft at 4 says, "consecutive 'no release' HAB scenarios should not occur" does not fix the problem; it simply allows that a licensee may choose to have a HAB with release simply every 16 years and essentially an onsite "security-type" drill the other time. 16 years is too long. An interesting thought is to force a spontaneous offsite emergency response drill when the licensee "flunks" the security "mock attack" drill	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0125-002a	Cumberland County Department of Public Safety, Eric Hoerner	NSIR/DPR-ISG-01 page 29 states "Scenarios with no or an unplanned minimal radiological release should not be used in consecutive hostile action-based exercises."Position/Comment on the Proposed RulemakingDelete statement, [del: "Scenarios with no or an unplanned minimal radiological release should not be used in consecutive hostile action-based exercises."]Cross Cuts ToORO Coordination NUREG 0654, Supp. 4 Basis / CommentDetermination of release or no release and size of release should be left up to the scenario development team and should not be prescribed by the ISG. The purpose of an exercise is to improve performance and having a radiological release during a HAB provides little training value. This is an irrelevant requirement that is counter to the philosophy of the rule change on "Challenging Drills and Exercises" in that it specifies a sequence associated with hostile action based exercises that allows the emergency response organization to anticipate scenario design with respect to radiological releases.	Noted	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0125-002b	Cumberland County Department of Public Safety, Eric Hoerner	(Continued)The ISG would require that once every other demonstration, a HAB exercise would include a large release.Further, requiring a large release associated with a HAB exercise is neither risk informed or realistic. Exercises are typically designed using design basis events, relevant source terms, and include additional equipment failures not anticipated in design basis events which lead to radioactive releases. Current philosophy exists with the current HAB drill scenarios. Scenarios are designed such that they exceed to DBT, however boundaries exist such as no take back is required in order to secure the plant.HAB exercise scenarios should remain consistent with the extent of play requirements outlined in NEI 06-04.NRC Rule Area: Licensee Coordination with OROs (also see NUREG 0654-Supp. 4 Comment Matrix, page 6)	Noted	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0060-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The proposed requirements for the hostile action based exercises require these to be done with a “no radiological release” scenario. If there is no radiological release then the exercise is simply a hostile action exercise and does not vary from many of the other types of hostile action/terrorism based exercises that are done on an ongoing basis and does not belong in a Radiological Emergency Response Plan Requirement. If we are requiring exercises without a radiological release isn’t that going beyond the scoop and the intent of the radiological emergency planning and wouldn’t the exercises simple be a security exercise and then should not be evaluated by a radiological response doctrine?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0086-034	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	N.1.b. Page II-136, line 36: Comments: The option to not require a General Emergency in exercise scenarios contradicts current requirements to achieve a General Emergency in order to drive Protective Actions and Decision for the general public. If such actions are required to meet biennial exercise evaluation criteria, then they will need to be forced by other mechanisms (e.g., scenario inject messages) thereby introducing further exercise artificiality, negative training and potential confusion. The statement should be deleted or further clarified.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA’s biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee’s required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

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no/minimal release scenarios	FEMA-2008-0022-0118-009	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	Criterion N.I.b describes certain scenario requirements to be exercised on a 6-year cycle as well as certain new scenario requirements to be exercised on an 8year cycle. Not only is this confusing, but it serves no purpose in making the scenarios any less predictable given the cycle is extended two years and two new scenario requirements are added. We recommend re-wording or restructuring this criterion to increase clarity. Furthermore, with regard to varying radiological releases, any scenario in which a General Emergency (GE) is not reached will result in participants failing to demonstrate all objectives because PAR's will likely not be made. We recommend either modifying the requirement or adding a special exception to the biennial exercise requirements to account for scenarios where a GE is not reached or any scenario wherein the jurisdiction had the appropriate discussions and decided not to issue PARs. GENERAL NOTE: This section appears to be plagued by logic shortfalls and needs to be revised in order to meet the stated objective of decreasing anticipatory responses during REP exercises.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
no/minimal release scenarios	FEMA-2008-0022-0102-042	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-136, Line 36: Not requiring a General Emergency in exercise scenarios conflicts with current requirements to reach a General Emergency ECL for demonstration of PARS/PADs, ANS and EAS elements affecting the general public. If these types of activities are not scenario-driven to meet biennial exercise evaluation criteria, then other scenario artificialities will be required, either by mini-scenarios or inject messages. These types of scenario workarounds may result in negative training and confusion among exercise participants. The requirement should be deleted or further clarified to address these concerns.Rationale: OROs cannot adequately demonstrate all appropriate biennial extent of play elements if no General Emergency classification is included in exercise scenarios	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
no/minimal release scenarios	FEMA-2008-0022-0130-020	State of Vermont, Barbara Farr	Page II-136: Reaching GE is not required, provided that ORO's adequately demonstrate all appropriate biennial criteria.Basic CommentsIf there is no GE classification, not all criteria would be demonstrated. Evaluation of criteria in the Extent of Play must be modified. Remove lines 36, 37, and 38.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
rapidly escalating scenarios					
rapidly escalating scenarios	FEMA-2008-0022-0105-024	Tennessee Emergency Management Agency, Gary Lima	A "HAD" should not even entertain anything but shelter in place all of the 10 mile. If a REP event occurs during the HAD scenario, then weight should be given to completion of all Site Area Emergency procedures and emergency response to the site for HAD being completed, before evacuation of the public in the 10 mile EPZ is considered.	Modified	This section of NUREG 0654/FEMA-REP-1 Supplement 4 language has been modified. Supplement 3 (the basis for this section) is undergoing revision and will be incorporated into the REP Program Manual when appropriate. PADs will be based on situational requirements and ORO plans/procedures. See Part C - Coordination Between OROs and Licensees During a Hostile Action-Based Incident.
rapidly escalating scenarios	FEMA-2008-0022-0129-049	Wisconsin Emergency Management, Teri Engelhart	Page: 9 Line: 5th paragraph Comment: It would be difficult to have a rapid escalation exercise and meet all of the biennial requirements. A sample scenario under these circumstances would be beneficial to see how this could be accomplished.	Modified	OROs plans/procedures should have provisions for rapid escalation incidents. During an exercise, OROs are evaluated based on their plans/procedures. See Part C - Coordination Between OROs and Licensees During a Hostile Action-Based Incident.
rapidly escalating scenarios	FEMA-2008-0022-0129-026	Wisconsin Emergency Management, Teri Engelhart	Page: II-132, Line: N.1.b, Comment: A sample matrix that lists the various scenarios and how they can be fit into the 6 and 8 year exercise schedule requirements would be beneficial	Rejected	FEMA has decided not to use a graphic to illustrate how the scenario variations could be arranged throughout the exercise cycle in order to avoid the possibility of such a graphic being interpreted as a prescribed schedule.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
rapidly escalating scenarios	FEMA-2008-0022-0106-067	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-133, Lines 29 - 30Comment: Scenario Variations… "An initial classification of or rapid escalation to a Site Area Emergency or General Emergency;" This is one of those areas that the Strategic Review had problems with and it was not settled then, so now it appears NRC and FEMA want to force it upon the OROs. The rapid escalation to an SAE or GE has occurred in past exercises due plant personnel calling for such rapid classifications before the scenarios required them. Where is the need for this requirement? What does this requirement prove? That ORO's can response to emergencies? ORO's have responded to rapidly escalating natural and man-made disasters every year! What is it that the NRC\FEMA want to see? That the ORO's can put out an EAS message telling the populace to stay-tuned for a couple of hours while officials try to get a handle on a situation before putting out additional information and responding? To have such exercises mandated just reflects NRC\FEMA's desire see exercise failures and to make it hard for new nuclear power stations to come on-line.Potential Impact: Does not really test response plans as exercise will be over too fast. Personnel don't learn anything from the exercise. May result in "Fast Breaker" exercises happening more than once in a six-year cycle. Will result in more exercise failures.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
rapidly escalating scenarios	FEMA-2008-0022-0101-102	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 8-12) The four emergency classifications are intended to be reflective of the progression of the emergency event. If FEMA and the NRC intend to have exercises begin at a site area emergency or rapidly escalate to a site area emergency, then there needs to be a technical basis for implementing such a requirement outside of a hostile action situation. Otherwise, this is an unnecessary requirement. The more realistic approach is to have exercises that start at an alert, as these are the typical initiating conditions that can lead to further degradation of plant conditions.	Noted	It is possible for the initial declaration to be SAE. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length					
exercise cycle length	FEMA-2008-0022-0122-016	Emergency Management and Homeland Security Division , James Porcello	It appears that FEMA is requiring such variety in exercise scenarios (no-release, off-hours, unannounced, different weather conditions) that it will be impossible to demonstrate each one of these in a six-year cycle.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0078-088	Minnesota Homeland Security and Emergency Management , kevin Leuer	REP is on a 6 year cycle where each nuclear power plant exercises biennially. The NEP is on a 5 year cycle where there is a single full-scale exercise that culminates at the end of 5 years. If this program were followed, each NPP would only exercise every 5 years as opposed to every other year. There are also complications brought by the addition of requirements for certain scenarios to be conducted every 8 years in a 6 year exercise cycle as proposed.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0108-127	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-132 Line: 24,34 Comment: Six-year, eight-year, HSEEP has something every 5-years? Standardize, please.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0058-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The language "Hostile action directed at the plant site" is in both the 6 year and the 8 year requirement which one is the requirement. A six year rotation is sufficient.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0072-001	Anonymous	Requiring a no-release scenario once per six year cycle is not in keeping with the goals of having challenging exercises with a variety of scenarios. It actually forces states with one licensee into a fixed scenario type rotation of one ingestion, one plume, and one no-release scenario. It also seems to be contrary to what was communicated during the focus group meetings.	Noted	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0097-077	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Part II.C, Criterion N.1.b COMMENT: The draft guidance identifies a hostile action and rapid escalation scenarios every six years and again every eight years. The draft guidance is too prescriptive about elements that should be demonstrated in a six year (or eight year?) cycle. Disagree with the guidance that says that exercise scenarios should now incorporate expanded causative events that go beyond NPP equipment malfunctions and operator actions to include other hazards (chemicals, hazardous materials, transportation incidents, natural hazards). BASIS: FEMA and NRC need to decide what the cycle for these elements will be. The guidance prescribes so many scenario variations that it would actually increase predictability. With all the prescribed scenario variations, it is difficult to see how the requirement that licensee, state, and local agencies must demonstrate a full range of protective actions for all jurisdictions with the Plume Exposure Pathway EPZ in the 6-year exercise cycle can be met. The other conditions and hazards should have there own exercise programs. They do not address the purpose of REP exercises.	Modified	HAB incidents serve as initiating events within a REP scenario to supplement other initiating events such as technological failure in the power plant. Regardless of the initiating event, once there is a release or threat of release of radiological materials, the response and the requirements will be the same across exercises. The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0073-048	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: II-132Comment: Lines 26 & 29-30 and 34-37. Criterion N.1.b. The first set of criterion says that they shall be tested within a six-year exercise planning cycle. Lines 34-37 state that these scenarios shall occur at least once every eight-years. This caused some confusion. Recommend modifying line 34 to read, "The following scenarios shall occur within each six-year exercise planning cycle but at a frequency not to exceed eight years between demonstrations:"Potential Impact: The mixing of 6-year and 8-year requirements is worded so that it causes confusion. Recommend modifying the language so that the intent is clear.Comment By: State/Locals	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0105-014	Tennessee Emergency Management Agency, Gary Lima	Non radiological release exercises during a REP funded exercise window are not an appropriate use of valuable time and resources. Exercising both HAD and REP has been practiced by Tennessee once (1) already in a full participation drill. We weighted direction and control to our FCC while the SEOC continued the REP direction and control requirements; proving that HAD is a mutually aided local jurisdictional response activity with no serious impediments to the REP response. The reason for this is the fact that the release is a post event to the already terminated hostile event. The terrorist threat emergency phase is over, the recovery phase begins and then the REP scenario becomes the new emergency phase.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0106-010	Nebraska Emergency Management Agency, Jonathan Schwarz	The 6 and 8- year requirements are confusing when the rapid escalation feature is a designated part of both cycles. Licensees are unfairly hamstrung in being unable to perform emergency maintenance procedures designed to mitigate or prevent a release of radiation offsite. This lack of scenario realism definitely impacts Licensee emergency maintenance operations and creates a false allusion for OROs that a release is always going to be an outcome in any drill or exercise that involves evaluation by FEMA staff. If participation by the entire ORO is to be a required part of the FEMA evaluation, this should become an out-of-sequence event, similar to MS-1 drills and Receptions Center evaluations	Modified	HAB scenarios will remain one of the required variations for biennial exercises. The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0078-011	Minnesota Homeland Security and Emergency Management , kevin Leuer	NUREG-0654 FEMA-REP-1 Rev. 1 Supp. 4 Evaluation Criterion N.1.b Page 11 and 12 The language “Hostile action directed at the plant site” is in both the 6 year and the 8 year requirement, which one is the requirement six or eight years?	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0079-002	Delaware Emergency Management Agency, James Turner	Issue: Exercise cycle: NRC and FEMA are requiring specific scenario variations to be included in a six year cycle and with hostile action scenario with rapid escalation to SAE or GE be once every eight years	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0105-012	Tennessee Emergency Management Agency, Gary Lima	Once every six (6) years verses once every (8) years is convoluted and not clearly understood	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0077-001	PA DEP Bureau of Radiation Protection, David Allard	PA BPR believes that adding an 8 year cycle to the 6 year cycle will cause confusion and difficulty in exercise scheduling. Has anyone actually tried to draft a schedule using all the criteria in N.1.b? PA BRP believes that FEMA should have one exercise cycle period, in which the necessary demonstrations can be scheduled.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0098-007	Kansas Department of Health and Environment, Thomas Conley	With regard to the exercise cycle and scenario development, there is a great deal of confusion and disagreement with the guidance document. The intent of the revision was to provide scenariodevelopers more latitude in scenario development by varying them in order to provide a more realistic environment for the players to re-act and respond. The intent was to remove the predictable nature of the exercises to overcome preconditioning. The guidance as written has a number of problems.First, the document alternatively talks about a six-year and then eight-year exercise cycle. No one is exactly sure what cycle the document is trying to establish. There is far too much room forinterpretation and confusion. A single exercise cycle should be selected for comment.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0095-007	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	With regard to the exercise cycle and scenario development, there is a great deal of confusion and disagreement with the guidance document. The intent of the revision was to provide scenariodevelopers more latitude in scenario development by varying them in order to provide a more realistic environment for the players to re-act and respond. The intent was to remove the predictable nature of the exercises to overcome preconditioning. The guidance as written has a number of problems.First, the document alternatively talks about a six-year and then eight-year exercise cycle. No one is exactly sure what cycle the document is trying to establish. There is far too much room forinterpretation and confusion. A single exercise cycle should be selected for comment.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

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exercise cycle length	FEMA-2008-0022-0112-002	Harford County Division of Emergency Operations, Linda Ploener	Also – the 6-year exercise cycle is not conducive to including hostile action exercises as well as rapid escalation exercises and the variety of scenarios that would be required in the cycle would still have to be robust to maintain all local EPZs' participation.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0020-054	Ashtabula County EMA, George Rolland	#54 [4.15.2] The current exercise cycle should be expanded from six years to an eight year cycle to include all scenario variations. Cross Cuts To: REP Program Manual, NUREG 0654, Supp. 4 Basis/ Comment: Compression of the proposed scenario elements including the hostile action scenario within the existing 6-year exercise cycle is impractical. Tracking of each scenario element in 3 evaluated exercises creates such predictability and inflexibility that contradicts the intent of the rule of providing challenging drills and exercises. Expanding the exercise cycle to eight years is a more effective way to add variability to exercise scenarios as opposed to having numerous requirements in a 3- exercise cycle.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0116-012	Nuclear Energy Institute, Alex Marion	Given the new exercise demonstration requirements, and the desire to make scenarios less predictable, the exercise planning cycle should be increased from six-years to eight-years, with all required elements to be demonstrated at least once in a cycle. Implementation of each scenario element in 3 evaluated exercises (per the existing 6-year cycle) will create more predictable scenarios and runs counter to the stated intent of the rule change. Expanding the exercise cycle to 8-years will increase opportunities for scenario variability.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

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exercise cycle length	FEMA-2008-0022-0116-006	Nuclear Energy Institute, Alex Marion	For those states that have multiple NPPs within their jurisdiction, the requirement to include an HAB exercise within the 6-year exercise cycle for each NPP adds a costly and unnecessary burden. It would require many of the same ORO assets to demonstrate the same responses several times in any given six-year period. An eight-year cycle would help to address this issue.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0116-007	Nuclear Energy Institute, Alex Marion	Another advantage of an eight-year exercise cycle is that it would allow for closer alignment to the Homeland Security Exercise Evaluation Process (HSEEP) principle of objective-driven scenarios.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0114-001	Count of Lancaster, Pennsylvania, Randall Gockley	I feel the current 6 year cycle should be expanded to an 8 year cycle. I appreciate and support the need for different types of scenarios, but feel an 8 year cycle is satisfactory to meet the goals of the program and minimizing some redundant costs in the exercises.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0130-004	State of Vermont, Barbara Farr	Changes to the Exercise Schedule: FEMA and NRC changes to specific scenarios should move the cycle from a 6 year to an 8 year process.Basic CommentsWith the addition of Hostile Action Based exercises “reading the exercise” is easier. Set the cycle at 8 years, not 6.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0106-018	Nebraska Emergency Management Agency, Jonathan Schwarz	Recommend combining the 6-year cycle and the 8-year cycle into a 12 year cycle. Evaluated exercise should be conducted only one every three years with accompanying MS-1 drill and Reception Center exercise being conducted only once every 3 years. Time and personnel used to conduct the exercises are very costly to local jurisdictions operating on limited budgets. The expense of these exercises target only seven counties of 93 counties in Nebraska and causes undue regulatory hardship for these small counties operating on reduced budgets. These exercises are imposed on top of State and Regional requirements. Historical data supports the validity of training while the absence of accidents/ incidents during the past 30 years resulting in a release of radiation offsite demonstrate the safety of Licensee operations and the robust safety systems of licensed nuclear power plants.The “Fast-breaker concept was rejected years ago. Offsite response from local jurisdictions, the State, and NGO has not been a problem identified during biennial exercises. The exercise cycle based upon NRC estimates of an accident which would produce an offsite release verify that a potential release is very remote. Therefore, OROs should not be subjected to repeated short-cycle exercises on a routine basis. A 3-year exercise cycle is more realistic based upon industry performance and ORO proven abilities.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

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exercise cycle length	FEMA-2008-0022-0106-031	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact: Combine the 6-year and 8-year cycles into a new 12-year cycle. However, as OROs and the Licensee progress through these requirements, it with become predictable to determine what “has” to happen during future exercise periods.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0095-038	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Third, based on one interpretation of the guidance, HABD exercises may be held once every eight years for states with a single reactor site, once every sixteen years for states with two reactors and longer for states with more than two reactors. The key or lead players in a HABD are from local law enforcement, fire companies and rescue squads. The likelihood of any one person playing in two exercises over an eight year period is very low and practically non-existent if the timeframe is longer because of the rate of turnover in those agencies. The intent of the HABD was to better prepare responders in an all hazards (National Response Framework/NIMS) environment. Can we accomplish this by exercising those assets every eight, sixteen or more years? Why is the NRF/NIMS being strictly applied to radiological programs? Isn't that predictable? What about the local and county organizations that need to respond to security threats at chemical facilities? Shouldn't they get the opportunity to drill to test their response for those types of incidents? It remains unclear why HABDs are strictly in the REP community for exercise evaluation.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

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exercise cycle length	FEMA-2008-0022-0098-038	Kansas Department of Health and Environment, Thomas Conley	Third, based on one interpretation of the guidance, HABD exercises may be held once every eight years for states with a single reactor site, once every sixteen years for states with two reactors and longer for states with more than two reactors. The key or lead players in a HABD are from local law enforcement, fire companies and rescue squads. The likelihood of any one person playing in two exercises over an eight year period is very low and practically non-existent if the timeframe is longer because of the rate of turnover in those agencies. The intent of the HABD was to better prepare responders in an all hazards (National Response Framework/NIMS) environment. Can we accomplish this by exercising those assets every eight, sixteen or more years? Why is the NRF/NIMS being strictly applied to radiological programs? Isn't that predictable? What about the local and county organizations that need to respond to security threats at chemical facilities? Shouldn't they get the opportunity to drill to test their response for those types of incidents? It remains unclear why HABDs are strictly in the REP community for exercise evaluation.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0106-082	Nebraska Emergency Management Agency, Jonathan Schwarz	Realism in potential radiological releases has never been a valid part of exercise planning. The difficulty in achieving a radiological release with today's robust safety systems is never considered. Hence, realism is thrown out before the scenario and EOP are ever written. More exercises should be conducted that involve no radiological release or a minimal radiological release that does not require public protective actions.Realistic risk analysis demonstrates that release scenarios on beyond reasonable estimates of potential release options predicted by the NRC. All-hazard analysis does not support a preponderance of scenarios where an actual release of radiation offsite would occur. A 12-year cycle with evaluated exercises occurring every three years and supporting operations, i.e., MS-1 drills, and Receptions Center exercise occurring at 1 ½ year intervals is a much more valid exercise program.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0077-010	PA DEP Bureau of Radiation Protection, David Allard	PA BPR believes that adding an 8 year cycle to the 6 year cycle will cause confusion and difficulty in exercise scheduling. Has anyone actually tried to draft a schedule using all the criteria in N.1.b? PA BRP believes that FEMA should have one exercise cycle period, in which the necessary demonstrations can be scheduled. PA BRP believes that more guidance needs to be provided in regards to the implementation of scheduling the additional requirements set out in this section, for states with multiple reactor sites.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0121-002	Utility Radiological Safety Board of Ohio, Nancy Dragani	It is very important to establish an exercise cycle (6 or 8 years?) and to determine what actions need to be demonstrated within that cycle. HAB should not be an additional burden to counties or states.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0086-033	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page II-133, line 17: Comments: The cited criterion is provided as an example. There is general confusion over the use of "once every 6 years", "6-year exercise cycle" and "once every 8 years". These time requirements should be clearly explained in relation to one another and defined in one location in the REP Program Manual.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exercise cycle length	FEMA-2008-0022-0102-041	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-133, Line 17: There are several examples in the draft REP Manual involving the inconsistent use of terms such as “once every 6 years”, “6-year exercise cycle” and “once every 8 years”. These time requirements should be clearly explained in relation to one another and defined in one location in the REP Program Manual.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
exercise cycle length	FEMA-2008-0022-0129-027	Wisconsin Emergency Management, Teri Engelhart	Page: II-136, Line: 37 - 45 Comment: Use of the terms “6 year exercise cycle”, “once every 6 years” and “once every 8 years” is confusing and needs better explanation. A sample exercise schedule would be beneficial.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
off-hours and unannounced exercises					
off-hours and unannounced exercises	FEMA-2008-0022-0079-023	Delaware Emergency Management Agency, James Turner	Page 11 Issue: At least one exercise over a period of six years should be unannounced. Basis/Comment: Real-world experience has shown that, at least in the arena of techno-accident based scenarios, they occur unannounced, but develop at a much slower pace and last much longer than the “fast breaker” of a typical exercise or drill. Unannounced exercises should reflect the real world by proceeding at a slower rate, in order to reflect reality and to allow OROs to effectively respond as they would in real life	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0102-010	Entergy Nuclear Operations, Inc., Michael Slobodien	Section IV Page 11, Paragraph 2 Third comment: It is our understanding that FEMA has not decided whether the current suspension of required offhours and unannounced exercises will continue. Until that determination is made, it is recommended that these be deleted from the document.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0102-011	Entergy Nuclear Operations, Inc., Michael Slobodien	Section IV Page 11, Paragraph 2 Fourth comment: Do exercises need to be conducted under various simulated or actual weather conditions (i.e., varying by actual seasons)? This requirement also needs clarification.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0102-008	Entergy Nuclear Operations, Inc., Michael Slobodien	Section IV Page 11, Paragraph 2 what is the required extent of play of the off-hours and unannounced exercise requirements? Can a core team respond (personnel required for minimum activation) or does this require a full activation of the ERO? This requirement needs clarification.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0102-009	Entergy Nuclear Operations, Inc., Michael Slobodien	Section IV Page 11, Paragraph 2 Second comment: The language in NUREG-0654 Supplement 1 regarding unannounced exercises is not consistent with the language in the proposed REP Manual (page II-134, line 18) which states that “Some exercises should be unannounced”.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0106-042	Nebraska Emergency Management Agency, Jonathan Schwarz	Every state and local governmental agency, including the State of Nebraska, wants to ensure that it has the capability to protect the health and safety of the public and its citizens. However, the changes recommended by the NRC/FEMA such as inserting or re-inserting the "Fast-Breaking", "HAB Event", "No-Notice" and "After-Hours" exercises only servces to place more of a burden on the States and Locals for planning and to prove they can pass an exercise.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0108-204	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 11 - IV.4 - Night exercises, unannounced exercises and exercises conducted under various weather conditions have been remove from N.1.b on page 12. However, on page 11, it is noted that night exercises, unannounced exercises and exercises conducted under various weather conditions "should" be performed. Is this a "shall" and part of NUREG-0654/FEMA-REP-1 somewhere or not?	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0126-019	Pilgrim Watch, Mary Lampert	The Draft (at 4) says, “Extent of play discussions should consider varying attack scenarios (i.e., insider threat or ground, waterborne, airborne, or a combination of attacks) every exercise cycle, as applicable to the NPP site. And, “Each organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. once every six years. Exercises should be conducted under various weather conditions. At least one exercise over a period of six yearsshould be unannounced.” Comment: It should read, “Shall” in place of “should.”	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0130-027	State of Vermont, Barbara Farr	Page 11: at least one exercise over a 6 year period should be unannounced.BASIS / COMMENTSReal world experiences has shown that, at least in the arena of the techno-accident based scenarios , they occur unannounced, but develop at a much slower pace and last much longer than the fast breaker of a typical exercise or drill. Unannounced exercises should reflect the real world by proceeding at a slower rate, in order to reflect reality and allow ORO's to effectively respond as they would in real life.	Noted	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0119-004	Progress Energy, Kenneth Heffner	Exercises will be conducted [del: during different seasons] over 6 years.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0119-008	Progress Energy, Kenneth Heffner	This element should not apply to many site where season differences are minimal (south, southwest, etc.) and should be deleted. It is also difficult to accomplish this varied schedule due to the difficulty in scheduling exercises with the desired time frams between exercised to meeting FEMA's schedule restrictions (one or two exercises per month with several weeks between). Scheduling exercises in Florida are further challenged by Hurricane Season. Exercises have been postponed due to suspend participation. It has finally been accomplished that all Florida Exercises are outside of hurricane season after 20+ years. Drills are routinely conducted in all seasons at allplants. This element can be demonstrated outside of the biennial exercise cycle.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0117-010	California Emergency Management Agency, Elaine Jennings	There is a statement that each organization should make provisions to start an exercise between 6:00 PM and 4:00 AM. We disagree for large scale exercises. The only significant difference in and exercise started during these hours is the evaluation of notification and activation procedures. However, the overtime cost to hold an exercise would be significant with little actual benefit.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0129-051	Wisconsin Emergency Management, Teri Engelhart	Page: 11 Line: 2nd paragraph Comment: By "unannounced" can the ORO give its employees some sort of timeframe, such as "during the week of," or is it to be considered entirely unannounced?	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0129-052	Wisconsin Emergency Management, Teri Engelhart	Page: 11 Line: 2nd paragraph Comment: Conducting exercises outside of standard business hours will be problematic due to union contracts. This may also cause additional financial costs to the utility because of overtime and backfill salaries.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0093-036	Texas Department of State Health Services, Bob Free	Since this is guidance, not rule, neither FEMA nor NRC have done a cost/benefit or risk analysis of these requirements. We should specifically ask for one. Although some responders would normally respond at night, not all would, nor should all be expected to. Darkness increases the chances of injury to staff that may not be merited for just an exercise. Similarly, an unannounced exercise creates continuity of operations problems at the office as well as at home that may not be justified for a mere exercise. It is difficult to figure out what the value added versus the increased risks and costs that is achieved by this requirement.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0131-004	Environmental Monitoring Group, Robert Free	Since this is guidance, not rule, neither FEMA nor NRC have done a cost/benefit or risk analysis of these requirements. We should specifically ask for one. Although some responders would normally respond at night, not all would, nor should all be expected to. Darkness increases the chances of injury to staff that may not be merited for just an exercise. Similarly, an unannounced exercise creates continuity of operations problems at the office as well as at home that may not be justified for a mere exercise. It is difficult to figure out what the value added versus the increased risks and costs that is achieved by this requirement. Finally, FEMA should clarify what they mean by “various weather conditions”. At the focus group meeting on NRC and FEMA security initiatives on May 28, 2008, in Denton, Texas FEMA/NRC said they really meant “seasonal conditions”, for instance, a county judge or mayor in Nantucket might make different decisions at the peak of the summer tourist season than they would in the dead of winter. We in Texas have conducted exercises during tornado warnings, hurricanes, ice storms, and bright, balmy days. Is that what is intended with this requirement?	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

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off-hours and unannounced exercises	FEMA-2008-0022-0093-038	Texas Department of State Health Services, Bob Free	Finally, FEMA should clarify what they mean by "various weather conditions". At the focus group meeting on NRC and FEMA security initiatives on May 28, 2008, in Denton, Texas FEMA/NRC said they really meant "seasonal conditions", for instance, a county judge or mayor in Nantucket might make different decisions at the peak of the summer tourist season than they would in the dead of winter. We in Texas have conducted exercises during tornado warnings, hurricanes, ice storms, and bright, balmy days. Is that what is intended with this requirement?	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0095-034	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Page II-133, line 11, has been eliminated by Supplement 4.	Accepted	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0098-033	Kansas Department of Health and Environment, Thomas Conley	Page II-133, line 11, has been eliminated by Supplement 4.	Accepted	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0100-019	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-133, Line 11 "Additional Scenario Variations" indicates that "Each Organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. once every six years". Please note that this "requirement" is in contradiction with the United States Nuclear Regulatory Commission NSIR/DPR-ISG-01 Interim Staff Guidance "Emergency Planning for NuclearPower Plants", Page 28, Rev. 0 (Draft) which states "Revised Evaluation Criterion N.1.b would apply to licensee, State and local organizations.Because FEMA no longer requires offsite organizations to participate in offhours or unannounced exercises, the portion of Evaluation Criterion N.1.b regarding these types of exercises would be relocated to new Evaluation Criterion N.1.c applicable to licensees only."	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

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off-hours and unannounced exercises	FEMA-2008-0022-0078-078	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-133, lines 11-13 “Should” (recommendation) or “shall” (requirement)?	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
off-hours and unannounced exercises	FEMA-2008-0022-0077-004	PA DEP Bureau of Radiation Protection, David Allard	Page 11-133 Lines 11-13 The value of off-hour exercises has not been demonstrated for REP program response. Unannounced exercises -- This is a venerable idea that was in vogue some years back, then fell out of favor. In point of fact, unannounced exercises were usually not a surprise, since they regularly occurred on a Tuesday or Wednesday of a specific week, and preparations for the exercise pointed to the date. Further, many volunteers participate in the exercises, and unannounced exercises would be detrimental to volunteer participation. PA BRP does not support inclusion of unannounced exercises.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0078-079	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-133, lines 11-13 State unions, shift change and overtime notification requirements, and overtime expenses are all factors that prohibit this from occurring outside of an actual emergency.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0090-015	York County Office of Emergency Management, James Welty	Page II-133, Lines 11-13: PA is a Commonwealth. PA has municipal level Emergency Operations Centers (EOC). This is required under PA Title 35. The majority of these EOCs are staffed by volunteers. It will place a burden on the volunteers to conduct unannounced drills. This idea was attempted in the past and was removed from the exercise criteria. I recommend that unannounced drills and the requirement for starting an exercise between 6:00 p.m. and 4:00 a.m. be removed.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

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off-hours and unannounced exercises	FEMA-2008-0022-0108-130	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-133 Line: 11-13 Comment: Define "should." The requirement to start an exercise between 1800 and 0400 is undesirable as are unannounced exercises.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0077-009	PA DEP Bureau of Radiation Protection, David Allard	Page II-133, Lines 11-13 - Clarify the use of the phrase 'various weather conditions'. If conducting exercises under 'various weather conditions' refers to using scenario weather data that represents various seasons of the year, PA BRP supports this effort. However, if this item refers to scheduling exercises in all seasons of the year, PA BRP would not support this, since field team demonstrations are problematic in winter conditions. We would not put our field teams at risk in icy or snowy weather for an exercise demonstration.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0080-017	Douglas Fleck	Page II-133, Line 12 states that once every six years an exercise should start between 6:00 p.m. and 4:00 a.m. What possible advantage is expected from doing this? OROs operate in the same manner during an emergency regardless of the time of day. All that starting an exercise later will accomplish is to require professionals to be paid more overtime therefore increasing the cost of the exercise and cause volunteers to spend even more time away from their jobs and families. This requirement should be dropped. Line 13 of the same page says that some exercises should be unannounced. This also would accomplish nothing but increase exercise cost and add additional hardship for volunteers. It also is not the least bit realistic. Exercises are scheduled well in advance for a given week. It does not take a genius to figure out that in order for hot washes and public meetings to be held at the conclusion of the exercise there will only be a small window of opportunity to actually conduct the exercise. Also having a huge contingent of federal evaluators arriving at a hotel or evaluation site in a local jurisdiction is a bit of a give away. This requirement should also be dropped.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

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off-hours and unannounced exercises	FEMA-2008-0022-0080a-016	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-133, Line 12 states that once every six years an exercise should start between 6:00 p.m. and 4:00 a.m. What possible advantage is expected from doing this? OROs operate in the same manner during an emergency regardless of the time of day. All that starting an exercise later will accomplish is to require professionals to be paid more overtime therefore increasing the cost of the exercise and cause volunteers to spend even more time away from their jobs and families. This requirement should be dropped. Line 13 of the same page says that some exercises should be unannounced. This also would accomplish nothing but increase exercise cost and add additional hardship for volunteers. It also is not the least bit realistic. Exercises are scheduled well in advance for a given week. It does not take a genius to figure out that in order for hot washes and public meetings to be held at the conclusion of the exercise there will only be a small window of opportunity to actually conduct the exercise. Also having a huge contingent of federal evaluators arriving at a hotel or evaluation site in a local jurisdiction is a bit of a give away. This requirement should also be dropped.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0100-020	Pennsylvania Emergency Management Agency, Henry Tamanini	Page II-133, Line 13 states that exercises should be conducted under various weather conditions. We recommend that the various weather conditions be accomplished by means of the exercise “scenario” weather. The scheduling of REP exercises requires close coordination with the licensee in terms of plant and “outage” schedules as well as schedules affecting the multiple OROs within an EPZ. Additionally, actual weather conditions in the EPZ may make it unsafe for field monitoring teams or route alert teams.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0080-018	Douglas Fleck	Page II-133, Line 13 states that exercises should be conducted under various weather conditions. Exercise dates are scheduled six years in advance at NRC/FEMA scheduling conferences. How on earth is anyone going to be able to predict the weather years, months, or weeks in advance of an exercise actually occurring? It may be possible to create exercise weather to be used in a pre-scripted scenario, but this accomplishes very little. All severe weather will do is increase response/evacuation times and give more weight to a sheltering protective action decision. Recommend this requirement be dropped.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0080a-017	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-133, Line 13 states that exercises should be conducted under various weather conditions. Exercise dates are scheduled six years in advance at NRC/FEMA scheduling conferences. How on earth is anyone going to be able to predict the weather years, months, or weeks in advance of an exercise actually occurring? It may be possible to create exercise weather to be used in a pre-scripted scenario, but this accomplishes very little. All severe weather will do is increase response/evacuation times and give more weight to a sheltering protective action decision. Recommend this requirement be dropped.	Modified	REP Program Manual has been corrected to remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0106-068	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-134, Lines 16 thru 18Comment: "Additional Scenario Variations. Each organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannouced." The "Off-Hours" and "Unannouced" exercise requirements were removed during the Stragtegic Review. Why are they back? Again it apears NRC and FEMA want to force more exercise requirements on the ORO's. Once again, the ORO's constantly respond to natural and man-made disasters and they are always unannounced and many more times than not, after normal working hours. So the question has to be asked again, "Why were these brought back?", even if they are only recommendations.Potential Impact: If the "Should" is changed to "Shall", these become unfunded federal mandates.	Modified	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0108-134	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-136/II-137/III-19 Line: 22/3/3 Comment: First, define "season." It is understandable that you would want to see personnel demonstrate criteria at differing times. However, is it a good practice to have personnel demonstrate during winter in Minnesota when temperature and road conditions are factor? If a region will not evaluate an exercise due to a "season," such as hurricane, how does one successfully demonstrate this portion of the criteria?	Modified	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0129-029	Wisconsin Emergency Management, Teri Engelhart	Page: II-137, Line: 3 Comment: Each plant will conduct exercises during different seasons over 6 years. This will be extremely difficult to accommodate in the FEMA annual scheduling process. Due to the utility outage schedules, states that have multiple sites and the fullness of the regional exercise schedule prohibits flexibility in the exercise schedule.	Modified	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0121-095	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -137 Line: 3 Comments: States "Exercises will be conducted during different seasons over 6 years." Does this mean each plant must conduct their exercises in different seasons? Or can the exercises be in the same season for individual plants as long as all the plants don't exercise in the same season. (e.g. plant 1 always exercises in the fall while plant 2 always exercises in the spring)	Noted	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. This requirement applies to the licensee only and has been separated into a new Evaluation Criterion. See Evaluation Criteria N.1.b and N.1.c in Part II.C - Planning Guidance.
off-hours and unannounced exercises	FEMA-2008-0022-0097-005	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The REP Program Manual now requires compliance with HSEEP for exercise planning; however, the combined NRC Rulemaking and FEMA proposed requirements for drill and exercise scenarios within the exercise cycle contradict a major principle of HSEEP. According to HSEEP, exercises should be objective driven based on capabilities, past performance and training needs. The scenario should be developed to support the objectives. However, based on proposed rulemakings by both the NRC and FEMA, exercises will be scenario driven regardless of the objectives outlined by HSEEP or ORO training needs. Further, because of the number of required elements and the prescribed frequency within a 3-exercise/6 year cycle, the exercise scenarios will become even more predictable than in the current condition.	Noted	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0116-001	Nuclear Energy Institute, Alex Marion	NEI submits that the consequence of requiring scenario elements as outlined is a scenario driven exercise as opposed to an exercise that, according to HSEEP, should be focused on capabilities and performance needs. (See comments under Section IV, Challenging Drills and Exercises) NEI recommends that the NRC and FEMA resolve this incongruence between the National Directive regarding the integration of the REP program into NRF (including HSEEP) and proposed guidance that seems to oppose this initiative.	Noted	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0116-008	Nuclear Energy Institute, Alex Marion	The NRC and FEMA's proposed prescription for scenario variables in a three-exercise/six-year cycle makes the exercises driven solely by scenario tracking. The HSEEP process focuses on objective development that is based upon capabilities and training needs; and is NOT scenario driven. What's being proposed by both the NRC and FEMA is a scenario driven approach to exercises that is not in conformance with HSEEP.	Rejected	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
off-hours and unannounced exercises	FEMA-2008-0022-0112-004	Harford County Division of Emergency Operations, Linda Ploener	HSEEP focuses on objective development based on capabilities, not scenario driven exercises.	Noted	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
challenging drills and exercises					
challenging drills and exercises	FEMA-2008-0022-0101-103	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 8-12) There are few plausible scenarios related to offsite chemical, hazardous materials or transportation incidents that would drive an onsite emergency declaration, and therefore these initiating events should not be included.	Noted	These initiating events do occur in real life and have been used in scenarios.
challenging drills and exercises	FEMA-2008-0022-0101-068	Florida Division of Emergency Management, Michael Younger	There are few plausible scenarios related to offsite chemical, hazardous materials or transportation incidents that would drive an onsite emergency declaration, and therefore these initiating events should not be included.	Modified	FEMA recognizes what the commenter wrote. It is the intent of the cited guidance to suggest initiating or concurrent events that could be used to enhance exercises and test ORO ability to respond to incidents that could affect the NPP. See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0106-022	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 10Comment: Ref IV.2. Scenario development and release options. FEMA Regional Headquarters should become part of the planning process by utilizing their plant specific planner as an exercise planner. Sitting at the table with planners from the State, local jurisdictions, NGOs and the Licensee would give them both training and an appreciation of the efforts required to build the exercise. Recently added FEMA inspectors have a lack of radiological backgrounds and require additional training before being allowed to run an evaluation.	Noted	All stakeholders will discuss these items at the initial planning conference.
challenging drills and exercises	FEMA-2008-0022-0106-023	Nebraska Emergency Management Agency, Jonathan Schwarz	Training for a radiological release is conducted locally by the Licensee on an annual basis for all OROs as documented in the Annual Letter of Certification. Therefore, realistic release options should only be included in ½ of the evaluated scenarios developed for the 12 year cycle. This would still constitute overkill of actual realistic release options.	Noted	Regardless of the exercise cycle length, radiological emergency preparedness exercises must provide opportunity for OROs to demonstrate radiological response capabilities. The comment is against FEMA policy and best practices.
challenging drills and exercises	FEMA-2008-0022-0106-029	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 10Comment: Ref IV.3. Varying release conditions. Is this realism or a new source for pre-conditioning? Wind shift has become to new NRC “gotcha”, based upon recent inspection results. Realism should be a consideration. Prevailing wind direction and speed, along with prevailing stability class should be used during most exercises. Wind shifts should occur only if necessitated by realist wind shifts in prevailing local jurisdictionsPotential Impact: Use of realistic wind and weather data will allow local OROs to exercise in conditions which “normally” occur in their jurisdiction. Practicing unusual weather conditions just to affect a specific population center or achieve specific Protective Action Recommendations (PARs) detracts from exercise realism and takes us back to pre-conditioning, i.e., using un-realistic scenarios to drive a desired outcome.If these are NOT requirements – why have they been included in this publication?	Noted	Wind shifts are included as suggestions to enhance realism. Wind shifts are very realistic conditions in many locations. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0126-007	Pilgrim Watch, Mary Lampert	The irony is that exercises are predictable in that they all follow a straight-line Gaussian model – the “key-hole;” when in fact that simplistic plume model does NOT apply to reactor sites. Properly designing exercise scenarios requires properly modeling where a plume is likely to travel at each site where the exercises are taking place. Varying likely release scenarios such as the sea breeze effect at coastal locations in exercises occurring in warmer months; accounting for the lack of turbulence over bodies of water when plumes blow out to sea, or over large lakes, that results in a concentration of the plume so that when the plume blows back to shore many miles outside the 10-mile EPZ it is concentrated and requires response actions.(Zager M, Tjernstrom M, Angevine W. 2004. New England coastal boundary layer modeling. In: AMS 16th Symposium on boundary Layers and Turbulance, August 2004, Portand, Maine. Angevine WM. Tjernstrom M, Senff CJ, White AB. 2004. Coastal Boundary layer Transport of urban pollution in New England In: 16th Symposium of boundary layers and turbulence Portland, Maine, 13th Symposium on Turbulance and diffusion, August 2004, Portland, Maine. Angevine WM. Tjernstrom M, Zager M. 2006. Modeling of the Coastal Boundary Layer and Pollutant Transport in New England, J. of Appl Meteorol & Climatol 45: 137-154. Scire JS, Strimaitis DG, Yamatino RJ. 2000 A User’s Guide for the CALPUFF Dispersion Model (Version 5). Concord MA: Earth Tech, Inc.)	Noted	Wind shifts are included as suggestions to enhance realism. Wind shifts are very realistic conditions in many locations. FEMA has provided this comment to the NRC for situational awareness.
challenging drills and exercises	FEMA-2008-0022-0126-008	Pilgrim Watch, Mary Lampert	Predictability can be avoided by requiring that exercise scenarios involve a significant release of radioactive materials offsite; not simply a minor release that requires evacuating 2-miles around and perhaps a portion of the population within a “key-hole” or wedge from 2-5 miles. Principle: If exercise scenarios test only for minor releases then any lessons learned provide no assurance that responders are ready for a more severe accident.a. NRC and FEMA downplay the potential consequences of a radiological disaster at a nuclear plant.	Noted	Wind shifts are included as suggestions to enhance realism. Wind shifts are very realistic conditions in many locations. FEMA has provided this comment to the NRC for situational awareness.
challenging drills and exercises	FEMA-2008-0022-0106-030	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Pages 10, 11 and 12Comment: Ref IV.4. Initiating Events and exercise cycles. Addition of the HAB event is a valid initiating condition in the times in which we live. Natural hazards may not achieve the desired release conditions due to the robust design criteria required under the NRC licensing process.	Noted	Natural hazards would be included in REP scenarios as inititating or complicating events, but might not be the only factor driving exercise play.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0121-094	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -136 Line: 9 thru 13 Comments: States "shall include varied release effects" etc. between scenarios. Later in the same paragraph it states these aren't requirements, but "areas of consideration for scenario development". This seems to be contradictory. Same statement appears in Supplement 4.	Modified	The cited REP Program Manual language has been amended so that paragraph now reads, "Varying release effects and meteorological conditions from scenario to scenario is one option for enhancing realism in exercise play. The variations should be consistent with plant design and site location and geography." See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0129-028	Wisconsin Emergency Management, Teri Engelhart	Page: II-136, Line: 9 - 13 Comment: It is written that future exercises "shall" include varied release and meteorological conditions, and several different types are listed. The manual also states that "these elements are not to be considered requirements." Please clarify if there is a requirement to vary scenario types and elements, and the time parameters that apply to these variations	Modified	The cited REP Program Manual language has been amended so that paragraph now reads, "Varying release effects and meteorological conditions from scenario to scenario is one option for enhancing realism in exercise play. The variations should be consistent with plant design and site location and geography." See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0108-133	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-136 Line: 9-13 Comment: First, "exercise scenarios shall include" and then "These elements are not to be considered requirements, but rather areas for consideration." Are the elements noted for the varying radiological release conditions something we "shall" do or something we "may" consider?	Modified	The cited REP Program Manual language has been amended so that paragraph now reads, "Varying release effects and meteorological conditions from scenario to scenario is one option for enhancing realism in exercise play. The variations should be consistent with plant design and site location and geography." See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0126-018	Pilgrim Watch, Mary Lampert	The Draft says (at 3) Varying Radiological Release Conditions, “In addition to the above changes, exercise scenarios shall include varied release effects and environmental and meteorological conditions between exercise scenarios within a cycle (e.g., momentary or puff vs. continuous release, ground vs. elevated release, shifting wind direction and speed), as applicable to plant design and historical site characteristics. These elements are not to be considered requirements, but rather areas for consideration as part of scenario development discussions.” Comment: This is internally inconstant. It is like having the front door closed but leaving the back door wide open.	Modified	The cited REP Program Manual language has been amended so that paragraph now reads, "Varying release effects and meteorological conditions from scenario to scenario is one option for enhancing realism in exercise play. The variations should be consistent with plant design and site location and geography." See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0129-050	Wisconsin Emergency Management, Teri Engelhart	Page: 10 Line: 3rd paragraph Comment: At the top of the paragraph the language says "shall include varied release effects" and at the bottom of the paragraph "These elements are not to be considered requirements" are contradictory. Please define whether this is required ("shall") or if it is optional.	Modified	The cited REP Program Manual language has been amended so that paragraph now reads, "Varying release effects and meteorological conditions from scenario to scenario is one option for enhancing realism in exercise play. The variations should be consistent with plant design and site location and geography." See the Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b. in Part II.C - Planning Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
challenging drills and exercises	FEMA-2008-0022-0101-100	Florida Division of Emergency Management, Michael Younger	IV. Challenging Drills and Exercises (pages 8-12) If the overall intent of both FEMA and the NRC is to educe exercise preconditioning and to provide for varying exercise scenarios, the proposed changes in this criterion do nothing to alleviate either of those concerns. Based on the proposed changes, a typical exercise cycle would include a plume phase exercise (with an ingestion phase component when appropriate), a hostile action based exercise, and a rapidly escalating exercise. Further, in situations with varying or no release options, the exercise remains predictable based on what occurred during the last appropriate scenario. Based on these new requirements, consideration should be given to extend the exercise cycle from its current six years to at least eight years.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0111-008a	Illinois Emergency Management Agency, Andrew Velasquez	On pages 8-11 there is a discussion of scenarios for radiological exercises. IEMA largely agrees with the proposals which would lead to greater variation in exercise scenarios and greater realism in exercise source terms by allowing smaller releases or no release option. The only problem with the revised guidance is that there still will be predictable exercises in that the proposed six year exercise cycle is now divided into three exercises is as follows, 1. A large release exercise, 2. A hostile action based exercise, and 3. A small or no release exercise. While there are some variations allowed such as allowing 8 years between hostile action drills there are only 3 exercises in a six year cycle This limits the variation. In Illinois with six sites there is more variation in that the so called ingestion exercise is rotated among the six sites adding flexibility for one exercise of the cycle to the other five sites. This policy is believed to still exist. The wording on exercise cycles and types of exercises is extremely complex and as such has the potential to cause confusion or disagreements over just what is required.An example of this comes from page 11 in the second paragraph, "Each organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. once every six years. At least one exercise over a period of six years should be unannounced".	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0111-008b	Illinois Emergency Management Agency, Andrew Velasquez	(continued)Contrary to this on page 12 this same information is lined out. To further confuse this issue page II-B3 of the FEMA REP Manual lines 11-13 references the off hours and unannounced exercise requirements. The final contradiction comes from page 28 of the NRC Interim Staff Guidance document which states, Because FEMA no longer requires offsite organizations to participate in off-hours or unannounced exercises, the portion of Evaluation Criterion N.l.b regarding these types of exercises would be relocated to new Evaluation Criterion N.1.c applicable to licensees only". While we believe the last statement to be true, the FEMA documents confuse the issue at best and contradict it at the worst. Illinois proposes the following simplification for exercise frequency. Limit the number of requirements for the six year exercise cycle to one hostile action drill. Other than the current requirements for an ingestion pathway exercise there would be no further guidance or requirements for type of exercise or scenario. Leave discussion recommending varying scenarios but do not complicate by specifying details which defeats the overall reason for this revision.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0106-007	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 2Comment: Ref I.A.IV: “Challenging Drills and Exercises” evidently does not correspond to realistic drills and exercises. The predictability of biennial exercises will not change due to the addition of new scenario variables, varied release conditions, non-sequential escalation of emergency classification levels (ECLs) and the incorporation of HAB events. The “New” additions seem to be a not so subtle attempt to incorporate the “Fast-breaker” into regulatory evaluation. As the document clearly states, “. . . it may be necessary to reach General Emergency classification in order to drive offsite response.” So much for predictability!	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0017-001	Anonymous	Making this a requirement does not decrease the predictability of the scenarios. Having a no/minimal release requirement, even with the 8 year scenario frequency which does not seem to apply here), locks planners into a strict schedule. One ingestion, one plume and one no/minimal release every six years. You are shooting yourself in the foot with this requirement. It needs to be optional to increase flexibility.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0095-037	Conference of Radiation Control Program Directors, Inc., Adela Salame-Alfie	Second, for those states with one nuclear facility, the proposed exercise cycle clearly makes theexercises very predictable. One plume pathway exercise with a release, then an ingestion pathway with a release, then a HABD without a release then in the next cycle plume, ingestion, and a HABD with a release and so on and so forth. It is very prescribed and predictable.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0098-037	Kansas Department of Health and Environment, Thomas Conley	Second, for those states with one nuclear facility, the proposed exercise cycle clearly makes theexercises very predictable. One plume pathway exercise with a release, then an ingestion pathway with a release, then a HABD without a release then in the next cycle plume, ingestion, and a HABD with a release and so on and so forth. It is very prescribed and predictable.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0101-065	Florida Division of Emergency Management, Michael Younger	Page II-132 – 137 If the overall intent of both FEMA and the NRC is to reduce exercise preconditioning and to provide for varying exercise scenarios, the proposed changes in this criterion do nothing to alleviate either of those concerns. Based on the proposed changes, a typical exercise cycle would include a plume phase exercise (with an ingestion phase component when appropriate), a hostile action based exercise, and a rapidly escalating exercise. The exercises may remain predictable based on what occurred during the last appropriate scenario. Based on these new requirements, consideration should be given to extend the exercise cycle from its current six years to at least eight years. Consideration should begiven to the expanded use of exercise credit via quarterly NPP drills to demonstrate key plan elements that may otherwise not be functionally demonstrated due to the scenarios proposed under this criterion.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0116-010	Nuclear Energy Institute, Alex Marion	NUREG 0654, Rev. 1, Supplement 4: “An HAB exercise can coincide with either a release scenario or a “no release” scenario; however, consecutive “no release” HAB scenarios should not occur.” These statements are counter to the philosophy of the rule change area regarding “Challenging Drills and Exercises” in that they specify a sequence associated with hostile action based exercises that allows the emergency response organizations to anticipate scenario design with respect to radiological releases.	Modified	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
challenging drills and exercises	FEMA-2008-0022-0113-096	North Carolina Division of Emergency Management, Stephen Payne	Page II-133, Line 20-22RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“The scenario shall be varied such that the major elements of the plans and preparedness organizations are tested within an exercise cycle.”BASIS:Rewording deletes the time period requirement and allows it to be specified in the Rep Program Exercise Guidance where it can be change more easily to meet the requirements of the exercise guidance.	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.
challenging drills and exercises	FEMA-2008-0022-0113-097	North Carolina Division of Emergency Management, Stephen Payne	Page II-133, Line 22-36 RECOMMENDATION/COMMENT: DELETE BASIS:This information needs to be relocated to the REP Program Exercise Guidance. By relocating, this methodology of conducting exercises can be more readily modified and tailored to meet the needs of the REP program.	Modified	Guidance on the types of exercises and scenario variations should be provided in the context of both plan development (Part II - Planning Guidance) and exercise development (Part III - Exercise Guidance). The REP Program Manual will be revised, however, to ensure consistency across the sections while avoiding excessive duplication.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0113-098	North Carolina Division of Emergency Management, Stephen Payne	Pages II-134- 138 RECOMMENDATION/COMMENT: DELETE/RELOCATE BASIS:This information needs to be relocated to the REP Program Exercise Guidance. By relocating, this methodology of conducting exercises can be more readily modified and tailored to meet the needs of the REP program.	Rejected	Guidance on the types of exercises and scenario variations should be provided in the context of both plan development (Part II - Planning Guidance) and exercise development (Part III - Exercise Guidance). The REP Program Manual will be revised, however, to ensure consistency across the sections while avoiding excessive duplication.
challenging drills and exercises	FEMA-2008-0022-0108-131	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-133/III-5 Line: 17-20/25-28 Comment: The State is required to review the plans and procedures annually, as are the local governments. When a Site has an exercise, the plans and procedures are reviewed again. Minimally, all plans and procedures are reviewed annually, often twice. The year of the ingestion pathway, it is unnecessary for all sites and OROs to review their plans/procedures in addition to the time consuming preparation for the IPX. Remove this additional burden.	Modified	The purpose of the guidance is to ensure that ingestion pathway plans/procedures are reviewed comprehensively at least once every eight years. It is not intended to suggest yet another review in addition to review already taking place. The guidance has been amended to read, "During the year in which the full-participation ingestion pathway exercise is held at one of the sites, the responsible OROs review their ingestion pathway plans/procedures for the other sites within the State to verify their accuracy and completeness." Please see Evaluation Criterion N.1.d. in Part II.C - Planning Guidance.
challenging drills and exercises	FEMA-2008-0022-0073-050	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: II-133Comment: Lines 25-29. Criterion N.1.b. The paragraph states that a State with no NPP should fully participate at least one ingestion exercise every six years. Recommend modify the statement to allow the Ingestion State to conduct their ingestion objectives during an OOS exercise. This would allow the ingestion counties in the State with the NPP in the opposite direction of the ingestion State to participate fully rather than having to always do OOS exercises.Potential Impact: Has a negative training impact on ingestion counties in the opposite direction from the State with no NPP. Those Counties are perpetually having to demonstrate their ingestion objectives in an Out-of-Sequence (OOS) exercise.	Modified	Jurisdictions can undertake expanded or additional exercises at their own initiative. FEMA's mandate includes supporting exercises other than biennial exercises. See the Explanation section of Evaluation Criterion N.1.d in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0104-004	Oregon Department of Energy, Shelley Carson	pg II-133, lines 25- 29 also stated on pg III-5, lines 34-36 Oregon strongly agrees with the statement, "If a State is within the 50-mile exposure pathway of a site in a bordering State, and the State does not have a NPP located within its own borders, the State should fully participate in at least one ingestion pathway exercise every 6 years at the bordering State's site(s)." By participating in a regularly scheduled Ingestion Exercise with the neighboring State, it allows the State without aNPP to fulfill their ingestion exercise objectives. It also allows the two States and affected counties to develop a working relationship when it comes to communication and drawing the food control boundary to meet at state borders. We strongly disagree with suggestions to have Ingestion States conduct their ingestion exercise objectives during an out-of-sequence exercise. This hinders the Ingestion State's ability to demonstrate ingestion exercise objectives because all the players that fully participate in the regularly scheduled Ingestion exercise would not be participating fully in an out-of-sequence exercise. Thus, having a negative impact in a real life emergency because the two States and affected counties would not have developed a relationship when it comes to communication and working together to produce the food control boundary. Recommendation: Continue to require States with no NPP located within its own borders but within the 50-mile exposure pathway of a site the ability to fully participate in at least one regularly scheduled ingestion pathway exercise every 6 years at the bordering State's site.	Noted	The capability to demonstrate these criteria can be negotiated between the Region and the OROs. Not all ingestion pathway scenarios can impact all ingestion counties. Out-of-sequence demonstration may be the only option in some instances.
challenging drills and exercises	FEMA-2008-0022-0075-001	Georgia Environmental Protection Division, Jim Hardeman	Subsequent discussions related to the types and frequencies of "required" exercises (i.e. HAB, ingestion pathway, "no or minimal release"), and the prescriptive manner in which they are to be included in an exercise cycle only serve to make the nature of REP exercises "predictable". An example is the recommendation that "[s]cenarios should not include a 'no release option' for successive HAB exercises at a particular site". Adding to the confusion is the language regarding scheduling of HAB drills (i.e. once per 6-year exercise cycle, no less frequently that once every 8 years).It is suggested that the REP exercise cycle be lengthened to 8 years. OROs should be given the maximum amount of flexibility in constructing exercise scenarios, consistent with the goal of demonstrating all Evaluation Areas / Sub-elements at least once every eight (8) years (see Exhibit III-2).	Modified	REP Program Manual language has been clarified. See Part III.B - REP Exercise Process, Section 1.b Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0125-007	Cumberland County Department of Public Safety, Eric Hoerner	Section IV Challenging Drills and Exercises and the NRC ISG directly contradict the HSEEP process for exercise development. A more practical approach to accommodating the objective of the rule would be to expand the exercise planning cycle to 8 years.	Rejected	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsections within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
challenging drills and exercises	FEMA-2008-0022-0108-201	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 8 - IV - Some of the predictable features are genuine. However, others are not. Releases often occur before a GE. PADs often do not go beyond 5 miles. Items such as tornados and insider boms are also addressed.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
challenging drills and exercises	FEMA-2008-0022-0126-004	Pilgrim Watch, Mary Lampert	Pilgrim Watch believes that the best way to avoid predictability is by requiring that the following exercise scenarios occur in some combination in every (6 year) cycle.a. Schedule a General Emergency that coincides with another offsite hazard that would place added strain on offsite responders and evacuation routes such as an earthquake, hurricane, and hazardous materials storage facility accident.b. Schedule a test that rotates seasons, so that seasonal variations in the population's activity and transient population changes are tested.c. Schedule an exercise that occurs during off-business hours, 7:00 pm - 4:00 am. The Draft recommends 6:00 pm; however that may coincide with, or be too close to, the end of business hours so that exercise players may not need to be called back to location.d. Schedule unannounced exercises, at a minimum of one exercise per exercise cycle, at a frequency of once every eight years.e. Schedule exercises that include fast breaking disasters	Rejected	FEMA concurs with the desire to avoid predictability in exercises and has clarified the language in the REP Program Manual on exercise cycles. However, it is not FEMA policy to require specific scenario combinations in the exercise cycle. The requirement for off-hours and unannounced exercises has been removed.
challenging drills and exercises	FEMA-2008-0022-0119-006	Progress Energy, Kenneth Heffner	Many of the elements listed here are currently required to satisfy FEMA requirements and exceptions to adequately demonstrate offsite preparedness. Some of these statements are broad and do not apply to a majority of the industry. There are many exercise scenarios that have releases prior to General Emergency declaration. Wind direction is varied and not "typically" directed towards major populations and is not always terminated before the end of the exercise.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0125-001	Cumberland County Department of Public Safety, Eric Hoerner	Compression of the proposed scenario elements including the hostile action scenario within the existing 6-year exercise cycle is impractical. Tracking of each scenario element in 3 evaluated exercises creates such predictability and inflexibility that contradicts the intent of the rule of providing challenging drills and exercises.Expanding the exercise cycle to eight years is a more effective way to add variability to exercise scenarios as opposed to having numerous requirements in a 3- exercise cycle.For those states that have multiple NPPs within their jurisdiction, the requirement to include HAB events within the respective 6-year cycle defeats the cost effectiveness of the new requirement where the same ORO assets would be required to repeatedly demonstrate the same response within given cycles which unnecessarily over burdens public safety assets.	Modified	REP Program Manual language has been clarified. See Part III.B - REP Exercise Process, Section 1.b Scheduling REP Activities, Exercise Cycle Requirements.
challenging drills and exercises	FEMA-2008-0022-0106-002	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: DocumentComment: General Comment #2: The pre-conditioned response by local jurisdictions mentioned by the NRC and FEMA has been driven by unrealistic scenarios required by NRC/FEMA in order to exercise the full Offsite Response Organization (ORO). Approximately 30 years of negative conditioning by the NRC/FEMA always requiring exercises to go beyond reasonable/logical potential release scenarios to a mandatory GENERAL EMERGENCY (GE) is the cause of this pre-conditioning. Since the incident at Three Mile Island and primarily due to robust safety systems and controls, extensive plant maintenance requirements/operations, and a safety mindedness that leads/exceeds other commercial industrial operations, there has not been a GE in the entire U.S. nuclear industry. Potential Impact: Pre-conditioning will continue due to regulatory requirements to exercise/grade the entire ORO rather than have realistic scenarios. Realistic scenarios are not part of the current exercise program that far exceeds NRC estimates of a potential accident/incident at a commercial nuclear power facility that would produce an offsite release of radiation that would exceed U.S. Environmental Protection Agency (EPA) Protective Action Guidelines (PAGs).	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0079-021	Delaware Emergency Management Agency, James Turner	Page 9 Section 1 Issue: Because players are preconditioned to expect this sequential and gradual escalation in emergency classification level over a compressed time period, they may anticipate and make decisions based on the exercise scenario and elapsed scenario time, rather than focusing on the unfolding scenario emergency conditions. Basis/Comment: OROs which conduct these actions, whether “preconditioned” or not, are violating their own SOPS, as well as NUREG, and at the very least, should get an ARCA if not a Deficiency if they do these during a graded exercise. There is no legitimate excuse for these actions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
challenging drills and exercises	FEMA-2008-0022-0130-025	State of Vermont, Barbara Farr	Page 9 section 1: Because players are pre-conditioned to expect the sequential and gradual escalation in ECL’s over a compressed time period, they may anticipate and make decisions based on the exercise scenario and elapsed scenario time, rather than focusing on the unfolding scenario and emergency conditions.BASIS / COMMENTSORO’s which conduct these actions, whether “preconditioned” or not may be violating their SOP’s and subject to legitimate actions.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0126-006	Pilgrim Watch, Mary Lampert	Predictability can be avoided (reality put into planning and exercises) by incorporating into exercises variable radiological releases patterns characteristic of the plant site – meteorological patterns recorded in historical regional meteorological data and studies (see FEMA Draft Proposal at 3).Exercises and planning, in general, must reflect an accurate understanding of the flow of air in coastal areas, river valleys, lake regions, and hilly terrain. Winds are variable in these locations; plumes do not travel in a straight line. This has been recognized by both EPA and NRC for many years, see Attachment A. Example: EPA's 2005 Guideline on Air Quality Models (Fed. Reg.,11/09/05) states in Section 7.2.8 Inhomogenous Local Winds that, "In very rugged hilly or mountainous terrain, along coastlines, or near large land use variations, the characterization of the winds is a balance of various forces, such that the assumptions of steady-state straight line transport both in time and space are inappropriate." EPA's November 9, 2005 modeling Guideline (Appendix A, to Appendix W) lists EPA's "preferred model." The straight-line Gaussian plume model is not on the list. NRC recognized the importance of variability of wind patterns as far back as the 1970's and early 1980's; they must have forgotten, along with FEMA. For example, see NRC Regulatory Guide 123 (Safety Guide 23); and 1983, NRC Guidance [NUREG-0737, Supplement 1 "Clarification of TMI Action Plan Requirements," January 1983Regulatory Guide 1.97- Application to Emergency Response Facilities; 6.1 Requirements.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
challenging drills and exercises	FEMA-2008-0022-0020-055	Ashtabula County EMA, George Rolland	#55 [4.15.2] Delete statement, "Scenarios with no or an unplanned minimal radiological release should not be used in consecutive hostile action based exercises" Cross Cuts To: ORO Coordination NUREG 0654, Supp. 4 Basis/ Comment: Determination of release or no release and size of release should be left up to the scenario development team and should not be prescribed by the ISG. The purpose of an exercise is to improve performance and having a radiological release during a HAB provides little training value. This is an irrelevant requirement that is counter to the philosophy of the rule change on "Challenging Drills and Exercises" in that it specifies a sequence associated with hostile action based exercises that allows the emergency response organization to anticipate scenario design with respect to radiological releases.	Noted	Refers to NRC document. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
challenging drills and exercises	FEMA-2008-0022-0129-030	Wisconsin Emergency Management, Teri Engelhart	Page: II-137, Line: 18 - 21 Comment: The statement "the drill shall be supervised and evaluated by a qualified drill instructor." Per the manual, this includes communications drills. Currently, drills are conducted and evaluated more informally. How would fulfillment of this criteria be demonstrated? What criteria constitutes a "qualified drill instructor"?	Noted	OROs are responsible for determining qualifications. See Criterion O.4.
Criterion N.2					
Criterion N.2	FEMA-2008-0022-0108-135	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-137 Line: 20 Comment: What are the requirements for a "qualified drill instructor?" What if a State does not have someone that is "qualified" per these requirements?	Noted	OROs are responsible for determining qualifications. See Criterion O.4.
Criterion N.2.a					
Criterion N.2.a	FEMA-2008-0022-0106-069	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-137, Lines 23 - 29Comment: Nuclear Power Station exercises in Nebraska have been using a broader spectrum of initiating events including earthquakes, tornadoes, and flooding of the Missouri River for several years now.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion N.2.a	FEMA-2008-0022-0113-099	North Carolina Division of Emergency Management, Stephen Payne	Page II-138, Line 35-36 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Communications with organizations that have roles in the emergency response should be tested at the minimum intervals specified above.”	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion N.2.a in Part II.C - Planning Guidance.
Criterion N.2.a	FEMA-2008-0022-0121-096	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -138 Line: 4 thru 5 Comments: Does this include all federal response organizations in the plan or just FEMA? Also, does this include Canada, which is within the ingestion pathway of two of Ohio's NPPs?	Noted	Federal organizations and Canadian governmental entities that would participate in a response to a radiological emergency at the NPP should particpate in the communications drills.
Criterion N.2.a	FEMA-2008-0022-0121-097	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -138 Line: 8 Comments: What constitutes a "message content check"?	Noted	The cited REP Program Manual text refers to a process for verifying that the content of the message was received accurately. OROs specify in their plans/procedures how the message content check should be conducted.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.2.c					
Criterion N.2.c	FEMA-2008-0022-0108-136	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-138 Line: 35-38 Comment: Please clarify the verbiage. What exactly needs to be performed "annually?"	Modified	Annual medical drills are required for each site. Medical drills are evaluated biennially. REP Program Manual language has been clarified. See the Explanation section of Evaluation Criterion N.2.c in Part II.C - Planning Guidance.
Criterion N.2.c	FEMA-2008-0022-0101-071	Florida Division of Emergency Management, Michael Younger	Page II-138, lines 37-38 If a change to the criterion is made to add “biennial,” then delete the term “annual” and replace it with “biennial.”	Accepted	The original NUREG-0654/FEMA-REP-1 published in 1981 specifies annual exercises. The requirement was changed in 1985 via Guidance Memorandum PR-1 to biennial exercises. The REP Program Manual has been amended to state that "The offsite portions of the medical drill may be performed as part of the required biennial exercise" with a footnote referencing GM PR-1.
Criterion N.2.c	FEMA-2008-0022-0113-100	North Carolina Division of Emergency Management, Stephen Payne	. Page II-139, Line 4-10 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“The plans/procedures should indicate that Federal, State, local and NPP communications systems will be tested as specified in Criteria N.2.a.”	Noted	Comment cannot be answered because the cited lines do not correspond to appropriate text in the published Federal Register version of the draft REP Program Manual and the intended reference cannot be identified.
Criterion N.2.c	FEMA-2008-0022-0101-073	Florida Division of Emergency Management, Michael Younger	A new bullet should be added to address the coordination and information sharing between onsite personnel and offsite responders as it relates the individual’s injuries or contamination levels duringpatient transfer or pickup.	Rejected	A bullet is not necessary. The coordination and information sharing between ambulance personnel and people who have knowledege of a victim's condition is part of the standard EMS procedures, whether there is radiation involved or not.
Criterion N.2.c	FEMA-2008-0022-0101-072	Florida Division of Emergency Management, Michael Younger	Page II-139, lines 13-14 This sentence should be clarified to include both offsite responders and onsite licensee personnel, should the licensee make an initial assessment of the individual’s external radiological contamination.	Rejected	The existing REP Program Manual uses the term "responder" which can apply to either offsite or onsite personnel. The existing REP Program Manual language is adequate.
Criterion N.2.c	FEMA-2008-0022-0101-074	Florida Division of Emergency Management, Michael Younger	Page II-139, lines 30-31 This statement should be modified to read “Medical personnel demonstrate the capability to determine whether individuals are contaminated, as appropriate, and demonstrate the procedures and equipment to remove or reduce contamination.” This change documents that medical personnel may not have the responsibility for initial monitoring if the monitoring is accomplished by another organization.	Accepted	The REP Program Manual has been amended as suggested. See bullet list under Evaluation Criterion N.2.c in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.2.c	FEMA-2008-0022-0108-137	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-139 Line: 34 Comment: Typo - "Dosimtery" should be "Dosimetry."	Accepted	The REP Program Manual has been amended as suggested. See bullet list under Evaluation Criterion N.2.c in Part II.C - Planning Guidance.
Criterion N.2.c	FEMA-2008-0022-0108-138	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-139 Line: 39 Comment: Should the State have any responsibility for N.2.c?	Noted	NUREG-0654/FEMA-REP-1 indicates that the State does not have responsibility for Criterion N.2.c, but the State may be involved in training or other applicable resources depending on how local authorities are structured in accordance with ORO policy. FEMA has provided this comment to the NRC for situational awareness.
Criterion N.2.c	FEMA-2008-0022-0113-101	North Carolina Division of Emergency Management, Stephen Payne	Page II-140, Line 1-2 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“The offsite portions of the medical drill may be performed as part of the required biennial exercise.”	Modified	The cited REP Program Manual language has been amended to read, "The medical services drill is evaluated biennially and may be held in conjunction with the biennial evaluated exercise." See the Explanation section of Evaluation Criterion N.2.c in Part II.C - Planning Guidance.
Criterion N.2.d					
Criterion N.2.d	FEMA-2008-0022-0121-098	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -140 Line: 17 thru 18 Comments: FEMA does not evaluate drills--they do evaluate ingestion exercises which are conducted every 6 years.	Modified	Certain drills, such as Radiological Monitoring Drills and Medical Services Drills, are evaluated biennially. See the Explanation section of Evaluation Criterion N.2.d in Part II.C - Planning Guidance.
Criterion N.2.d	FEMA-2008-0022-0129-031	Wisconsin Emergency Management, Teri Engelhart	Page: II-140, Line: 18 - 19 Comment: The explanation following Criterion N.2.d states that RAD monitoring drills can be held in conjunction with an exercise. Previously, drills conducted in conjunction with an exercise were not allowable in the Letter of Certification, with the exception of the medical drills. As written, it will be interpreted that a RAD monitoring drill separate from an evaluated exercise is not necessary.	Modified	The ALC Checklist has been amended to state that only non-evaluated drills need to be reported in the ALC. See Part IV.O - Annual Letter of Certification, Section 3 - ALC Review Guide.
Criterion N.2.d	FEMA-2008-0022-0073-052	Washington Military Department Emergency Management Division, Jim Mullen	Potential Impact: The Department of Health (DOH) will execute those monitoring activities consistent with the specific drill scenario. RECOMMENDATION: It is recommended that DHS/FEMA develop a method by which to discriminate between requirements of a radiological exercise and those of a Hostile Action Based exerciseComment By: State Department of Health	Rejected	HAB incidents serve as initiating events within a REP scenario to supplement other initiating events such as technological failure in the power plant. Regardless of the initiating event, once there is a release or threat of release of radiological materials, the response and the requirements will be the same across exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.2.e					
Criterion N.2.e	FEMA-2008-0022-0108-139	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-141/IV-28/B-12 Line: 2/17/30-31 Comment: Please define "health physics" in reference to drills for those who do not use that terminology.	Noted	The definition of "health physics" is in the REP Program Manual glossary: Health physics: the science of recognizing, evaluating and controlling health hazards from ionizing radiation.
Criterion N.2.e	FEMA-2008-0022-0073-053	Washington Military Department Emergency Management Division, Jim Mullen	Potential Impact: The Department of Health (DOH) will execute those monitoring activities consistent with the specific drill scenario. RECOMMENDATION: It is recommended that DHS/FEMA develop a method by which to discriminate between \requirements of a radiological exercise and those of a Hostile Action Based exerciseComment By: State Department of Health	Rejected	HAB incidents serve as initiating events within a REP scenario to supplement other initiating events such as technological failure in the power plant. Regardless of the initiating event, once there is a release or threat of release of radiological materials, the response and the requirements will be the same across exercises.
Criterion N.2.e	FEMA-2008-0022-0108-140	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-141 Line: 28 Comment: What does FEMA define as "actual elevated radiation levels?"	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion N.3					
Criterion N.3	FEMA-2008-0022-0108-141	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-142 Line: 3-5 Comment: When is it expected for the "development of exercise scenarios and exercise evaluation guidance" to be available?	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Criterion N.4					
Criterion N.4	FEMA-2008-0022-0129-032	Wisconsin Emergency Management, Teri Engelhart	Page: II-142, Line: 32 - 35 Comment: Criterion N.4 - Does the word "observer" mean "evaluator"? If not, can an evaluation by an official observer be used by FEMA, resulting in a ARCA or deficiency? Please clarify if there are any training or other requirements for these observers and how they fit into the exercise evaluation?	Noted	The roles of observers and evaluators are handled at the Regional level. To avoid confusion, Criterion N.4 has been amended to read, "Biennial exercises shall be evaluated and critiqued as required. FEMA evaluators shall evaluate offsite emergency response organization performance in the biennial exercise in accordance with FEMA REP exercise methodology." The details regarding exercise evaluation are found in the explanation and in HSEEP guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion N.4	FEMA-2008-0022-0078-083	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-142, lines 32-35 This adds a second formal evaluation of the exercise and duplicates efforts;	Noted	The roles of observers and evaluators are handled at the Regional level. To avoid confusion, Criterion N.4 has been amended to read, "Biennial exercises shall be evaluated and critiqued as required. FEMA evaluators shall evaluate offsite emergency response organization performance in the biennial exercise in accordance with FEMA REP exercise methodology." The details regarding exercise evaluation are found in the explanation and in HSEEP guidance.
Criterion N.4	FEMA-2008-0022-0078-084	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-142, lines 32-35 This states that observers will participate in a critique producing a formal evaluation; in other words, that observers will be formally evaluating. This contradicts the understanding that evaluators are assigned to produce a formal evaluation, while observers observe. Please clarify.	Noted	The roles of observers and evaluators are handled at the Regional level. To avoid confusion, Criterion N.4 has been amended to read, "Biennial exercises shall be evaluated and critiqued as required. FEMA evaluators shall evaluate offsite emergency response organization performance in the biennial exercise in accordance with FEMA REP exercise methodology." The details regarding exercise evaluation are found in the explanation and in HSEEP guidance.
Criterion N.4	FEMA-2008-0022-0078-085	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-142, lines 32-35 If observers truly will be involved in the evaluation process, what type of training will be required for an observer?	Noted	The roles of observers and evaluators are handled at the Regional level. To avoid confusion, Criterion N.4 has been amended to read, "Biennial exercises shall be evaluated and critiqued as required. FEMA evaluators shall evaluate offsite emergency response organization performance in the biennial exercise in accordance with FEMA REP exercise methodology." The details regarding exercise evaluation are found in the explanation and in HSEEP guidance.
Criterion N.4	FEMA-2008-0022-0106-025	Nebraska Emergency Management Agency, Jonathan Schwarz	FEMA evaluations have in the past several years become very adversarial with evaluators not taking into account players logs of actions performed when simultaneous actions have been performed that are not observed by the evaluators. New evaluators have been rushed into evaluations of exercises of which they have no concept. Contract evaluators in some cases have no concept of new technologies in use in modern emergency management.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
Criterion N.4	FEMA-2008-0022-0113-102	North Carolina Division of Emergency Management, Stephen Payne	Page II-144, Line 32RECOMMENDATION/COMMENT: REWORD AS FOLLOWS::"The State's Annual Letter of Certification (ALC) . . ."	Rejected	The acronym ALC is defined the first time it appears in the REP Program Manual in Part I, as well as Appendix A, Abbreviations and Acronyms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Planning Standard O					
Criterion O.1					
Criterion O.1	FEMA-2008-0022-0106-070	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-145, Lines 31 - 32Comment: Under Planning Standard O - Radiological Emergency Response Training it states plans should identify "Organizations that will ensure appropriate personnel participate in training courses designed for individuals who will assist in radiological emergency response (e.g. transportation providers)". Those organizations may be identified in the plan, but this was still the United States of American and individuals still have the freedom to decide whether participate in training or not and that should be made clear as well.	Noted	The requirement is that the training is OFFERED.
Criterion O.1	FEMA-2008-0022-0113-103	North Carolina Division of Emergency Management, Stephen Payne	ITEM: “. . . Federal- and State-sponsored . . .” Page II-146, Line 13-14RECOMMENDATION/COMMENT: DELETE	Rejected	Comment cannot be answered because the cited lines do not correspond to appropriate text in the published Federal Register version of the draft REP Program Manual and the intended reference cannot be identified.
Criterion O.1	FEMA-2008-0022-0078-086	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-144, lines 14, 15 ICS training should not be required in the REP training program because it already exists and is required. HSPD-5 requires Federal departments and agencies to make the adoption of NIMS by State and local organizations a condition for Federal preparedness grants.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.1	FEMA-2008-0022-0078-087	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-144, lines 14, 15 The ICS requirement does not come from REP, and REP training is not ICS training. rate training already exists specifically for ICS and NIMS.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
Criterion O.1	FEMA-2008-0022-0101-075	Florida Division of Emergency Management, Michael Younger	Page II-144, lines 14-15 As previously noted in comments for criterion A.1.a, NIMS is not mandatory. ICS training should not be a requirement of the REP program as that requirement already lies elsewhere for OROs that have adopted NIMS.	Modified	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A - Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.1	FEMA-2008-0022-0121-100	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -144 Line: 16-17 & 27-28 Comments: See comments on Part II.C, Page 11-110, Lines # 45-47 [Referenced comment says: Methods for estimating the number of potential responders, supplies and equipment, as well as the amount of consumption and loss will be difficult to estimate. This is especially true when pre-planning, considering the numerous types of hostile actions scenarios with various resource requirements. This requirement is unrealistic. It would be better to say that an ORO will rely on in state mutual aid agreements, interstate mutual aid from the Emergency Management Assistance Compact (EMAC) and available aid, resources and supplies from the federal government beyond the immediate capacity of the ORO.]	Modified	OROs need to make an effort to develop estimates for a planning basis. Provisions should be in place for offering radiological training to support organizations. See the bullet list under Evaluation Criterion O.1 in Part II.C - Planning Guidance.
Criterion O.1	FEMA-2008-0022-0086-035	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	N.5. Page II-144, line 23: Comments: It is not clear whether this applies only to ARCAs and Planning Issues, or to other improvements identified by OROs. If it applies to all self-identified issues (including low priority program enhancements), then the recordkeeping required for the AlC and annual update could be very complex and cumbersome for both the County and the State, especially for low-priority or long lead time issues. The increased recordkeeping burden involved in corrective action tracking and reporting in ALC/annual updates could discourage efforts to voluntarily self-identify and resolve opportunities for improvement. Self-identification of issues, including those of minor significance or those requiring long completion times should be encouraged. This section requires clarification as to the detail required in the ALC\ annual update and should strive to make the reporting documentation less onerous on OROs.	Noted	In addition to ARCAs and Deficiencies, the improvement plan will include recommendations based on observations that are not ARCAs or Deficiencies. OROs are responsible for deciding how to track itemsrecommendations in their improvement plan. FEMA will not track these recommendations for any kind of re-demonstration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.1	FEMA-2008-0022-0102-043	Entergy Nuclear Operations, Inc., Michael Slobodien	Page II-144, Line 23: It is not clear whether this requirement applies only to ARCAs and Planning Issues, or to other more minor opportunities for improvements identified by OROs. If it applies to all self-identified issues (including low priority program enhancements), then the recordkeeping requiredfor the ALC and annual update could be cumbersome for both the County and the State, especially for low-priority or long lead time issues. This section requires clarification as to the detail required in the ALC/ annual update process.Rationale: The increased recordkeeping burden involved in corrective action tracking and reporting in ALC/annual updates could discourage efforts to identify and resolve opportunities for improvement. Self-identification of issues, including those of minor significance or those requiring long completion times should be encouraged and not be made subject to annual regulatory reporting requirements.	Noted	In addition to ARCAs and Deficiencies, the improvement plan will include recommendations based on observations that are not ARCAs or Deficiencies. OROs are responsible for deciding how to track itemsrecommendations in their improvement plan. FEMA will not track these recommendations for any kind of re-demonstration.
Criterion O.1.a					
Criterion O.1.a	FEMA-2008-0022-0129-033	Wisconsin Emergency Management, Teri Engelhart	Page: II-145, Line: 2 - 4 Comment: Criterion O.1.a - There needs to be clarification on the licensee training obligation as to whether this training applies only for off-site responders that come on-site or all off-site responders.	Noted	Criteria applicable to only the licensee have been included in the REP Program Manual for informational purposes and to ensure consistency with 44 CFR Part 305.5 and NUREG-0654/FEMA-REP-1. The REP Program Manual does not elaborate on NUREG-0654/FEMA-REP-1 criteria that apply only to the licensee. FEMA has provided this comment to the NRC for situational awareness.
Criterion O.1.b					
Criterion O.1.b	FEMA-2008-0022-0129-034	Wisconsin Emergency Management, Teri Engelhart	Page: II-145, Line: 15 - 17 Comment: Criterion O.1.b - More clarification and direction is needed to explain how "offsite response organizations shall participate in and receive training." Are there minimum training requirements and who is responsible for delivering the training? Criterion O.1.a implies that the licensee is responsible for all training for offsite response. In the case of mutual aid responders, will just-in-time training meet the requirement?	Noted	OROs are responsible for ensuring that training is offered.
Criterion O.1.b	FEMA-2008-0022-0042-012	Ned Wright	Page II-145, Line 17: A footnote or other reference needs to be added as it pertains to “offered training.” The training must be offered but does not have to be accepted or actually conducted, but a record of this fact must be maintained for inspection.	Noted	The current language is sufficient and consistent with the ALC checklist.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.1.b	FEMA-2008-0022-0108-142	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-145 Line: 17 Comment: The training may be offered to other organizations within the mutual aid, but what if it is not accepted?	Noted	OROs are responsible for ensuring that training is offered, and every effort should be made to encourage attendance.
Criterion O.1.b	FEMA-2008-0022-0121-101	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II-145 Line: 21-22 Comments: Under this statement the "X" indicates that the State must comply with this, which might be OK if the term "local" does not apply to state government. The state of Ohio has mutual aid agreements, both intrastate (IMAC) and interstate (EMAC). It would be very difficult to offer training to all who are party to those agreements. The requirement's explanatory material at this point should clarify this distinction between state and local.	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate. The cited text is quoted verbatim from NUREG-0654/FEMA-REP-1. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being co
Criterion O.4					
Criterion O.4	FEMA-2008-0022-0129-035	Wisconsin Emergency Management, Teri Engelhart	Page: II-146, Line: 12 - 17 Comment: Criterion O.4 - Do personnel that work in an Emergency Operations Center vs. field operations require an established training program? (With the exception of directors and coordinators). For instance, are subject matter experts, such as those that serve on an Ingestion Pathway Task Force required to have and complete an established training program? The planning standard states that "personnel who will implement radiological emergency response plans" require an established training program, but the list below indicates only Directors and Coordinators. Please expand on the explanation	Noted	Other persons with responsibilities for implementing radiological emergency response plans are specified in Criteria O.4.a through O.4.j.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.4.b					
Criterion O.4.b	FEMA-2008-0022-0113-104	North Carolina Division of Emergency Management, Stephen Payne	Page II-146, Line 13-14 RECOMMENDATION/COMMENT: RETURN TO ORIGINAL WORDING:O.4.b. Personnel responsible for accident assessment.andO.4.c. Radiological monitoring teams and radiological analysis personnel.ExplanationThe plan should discuss training programs that are specific to:1. Accident assessment personnel; and2. Radiological monitoring teams and radiological analysis personnel.All training programs should include the provisions listed under Criterion O.4.a.Plan(s) That Should Include This Information Licensee X State X Local * * NRC and FEMA encourage State, Tribal, and local governments that have these capabilities to continue to include them in their training programs	Rejected	FEMA determined that it is preferable to address O.4.b and O.4.c separately rather than combining them.
Criterion O.4.b	FEMA-2008-0022-0108-143	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-147 Line: 6 Comment: Typo - "incient" should be "incident."	Accepted	The REP Program Manual has been amended as suggested. See Explanation section of Evaluation Criterion O.4.b in Part II.C - Planning Guidance.
Criterion O.4.g					
Criterion O.4.g	FEMA-2008-0022-0108-144	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-149 Line: 6 Comment: See also footnote 133. It is preferable for O.4.g to state "emergency management personnel" instead of "Civil Defense/Emergency Service personnel." The footnote can remain as written.	Noted	The cited use of the term "civil defense" is part of original NUREG text. FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.
Criterion O.4.g	FEMA-2008-0022-0090-002	York County Office of Emergency Management, James Welty	Page II – 149: line 6: Civil Defense/Emergency Service personnel. Civil Defense is no longer used.	Noted	The cited use of the term "civil defense" is part of original NUREG text. FEMA and NRC are aware that portions of NUREG-0654/FEMA-REP-1 need to be revised. Changes to NUREG-0654/FEMA-REP-1 language other than those associated with Supplement 4 are outside of scope of the current NRC rulemaking and updating of the REP Program Manual. A revision of NUREG-0654/FEMA-REP-1 is being considered, and the commenter's suggestion has been noted for review at that time. The REP Program Manual will be updated when NUREG-0654/FEMA-REP-1 is revised.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion O.5					
Criterion O.5	FEMA-2008-0022-0108-145	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-150 Line: 33,39 Comment: Is annual retraining based on calendar year or 12 months? If it is 12 months, then is there an acceptable leeway? Should that be stated in the plans/procedures?	Noted	Common practice is to use the calendar year, but the fiscal year is also acceptable. OROs should specify in the ALC if they are using anything other than the calendar year.
Planning Standard P					
Criterion P.1					
Criterion P.1	FEMA-2008-0022-0108-146	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-152 Line: 7 Comment: Does FEMA have a recommendation for what training should be provided to "individuals responsible for the planning effort?"	Noted	Training requirements are determined by the ORO in their plans/procedures. FEMA offers many program and planning courses through EMI, including E/L-340, the REP Program and Planning Course.
Criterion P.3					
Criterion P.3	FEMA-2008-0022-0108-147	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-153 Line: 4 Comment: Is it necessary to create a specific title within plans/procedures of the person responsible for plan coordination? It has not been acceptable to state the title responsible for the requirements without the specific addition of the EPC designation.	Noted	The requirement is to identify the title of the person responsible for the function of plan coordination. The exact title will vary from ORO to ORO and may be a person with multiple functions.
Criterion P.4					
Criterion P.4	FEMA-2008-0022-0108-148	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-153/II-154 Line: 35,39,40/1-3 Comment: Please define a time frame in which planning issues for a calendar year are not due with the ALC January 31 of the next year. For example, if a planning issue were found during an exercise in October, is it due at the same time as a planning issue found during an exercise in May.	Modified	The REP Program Manual language has been clarified and now reads as follows: "Plan Issues are corrected through revision of the appropriate plans/procedures within one year or during the next annual plan review and update, submitted for FEMA review, and reported in the State's ALC." See Part III.B - REP Exercise Process, Section 6.G.3 - Documenting REP Exercises, Correction of Issues, Correction of Plan Issues.
Criterion P.4	FEMA-2008-0022-0121-102	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -154 Line: 6 Comments: Why is this necessary? The ALC is sent to FEMA every January.	Noted	Evidence in the plan of the most recent ALC provides information to any reviewer on when the plan was last certified current.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion P.4	FEMA-2008-0022-0080-020	Douglas Fleck	Page II-154, Line 6 seems to indicate that all off-site plans should include evidence of an ALC within the past year, on a signature page. Why is it necessary to verify that there was an "Annual" Letter of Certification on the signature page of a plan? By its very name we already know that the ALC is submitted annually. Nobody should have to update the signature page of a plan annually merely to reinforce this fact to an evaluator. Besides, the signature of these plans is normally of the senior elected official(s) of the respective OROs. It is no small effort to get these signatures and it should not have to be done annually just to confirm that an ALC was submitted. Recommend this requirement be deleted.	Modified	The cited line has been amended to allow OROs to determine the form of annual certification included in the plan. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.
Criterion P.4	FEMA-2008-0022-0080a-019	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-154, Line 6 seems to indicate that all off-site plans should include evidence of an ALC within the past year, on a signature page. Why is it necessary to verify that there was an "Annual" Letter of Certification on the signature page of a plan? By its very name we already know that the ALC is submitted annually. Nobody should have to update the signature page of a plan annually merely to reinforce this fact to an evaluator. Besides, the signature of these plans is normally of the senior elected official(s) of the respective OROs. It is no small effort to get these signatures and it should not have to be done annually just to confirm that an ALC was submitted. Recommend this requirement be deleted.	Modified	The cited line has been amended to allow OROs to determine the form of annual certification included in the plan. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.
Criterion P.4	FEMA-2008-0022-0100-022	Pennsylvania Emergency Management Agency, Henry Tamanini	NUREG Criterion P.4 Page II-153 states "Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises." Page II-154 at Line 6 indicates that the plans/procedures should include evidence of an Annual Letter of Certification (ALC) within the past year, on a signature page. We recommend that this requirement be changed or modified to allow for the use of an "Annual Certification of Review" page with which attests to the date and the name of the individual that has reviewed and/orupdated the plan/procedure.	Modified	The cited line has been amended to allow OROs to determine the form of annual certification included in the plan. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.
Criterion P.4	FEMA-2008-0022-0111-029	Illinois Emergency Management Agency, Andrew Velasquez	page II-154 it states that plan/procedures should include evidence of an ALC within the past year on a signature page. Recommend that this be incorporated by reference.	Modified	The cited line has been amended to allow OROs to determine the form of annual certification included in the plan. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion P.4	FEMA-2008-0022-0113-105	North Carolina Division of Emergency Management, Stephen Payne	Page II-156, Line 8 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Evidence of an ALC within the past year, on a signature page or by reviewing the Annual Letter of Certification."	Modified	The cited line has been amended to allow OROs to determine the form of annual certification included in the plan. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.
Criterion P.5					
Criterion P.5	FEMA-2008-0022-0080-021	Douglas Fleck	Page II-154, Line 33 states that plans should be marked with revision bars showing where changes have been made. It is a shame this document we are reviewing was exempted from that requirement.	Noted	FEMA is publishing the final 2010 REP Program Manual update and Supplement 4 with a track changes version included. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
Criterion P.5	FEMA-2008-0022-0080a-020	Pennsylvania Emergency Management Agency, Douglas Fleck	Page II-154, Line 33 states that plans should be marked with revision bars showing where changes have been made. It is a shame this document we are reviewing was exempted from that requirement.	Noted	FEMA is publishing the final 2010 REP Program Manual update and Supplement 4 with a track changes version included. Please note that FEMA will always entertain submission of comments on national level polices for future consideration and revisions by mailing them to FEMA REP Policy Team, 1800 S. Bell Street, Arlington, VA 20598-3025.
Criterion P.7					
Criterion P.7	FEMA-2008-0022-0108-149	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-155 Line: 31 Comment: This question is not specific to P.7, but to any criterion that references the requirement of an appendix. Is an appendix necessary if the NUREG cross reference supplies to the correct location?	Noted	With Regional approval, the same appendix can accomplish both functions.
Criterion P.8					
Criterion P.8	FEMA-2008-0022-0112-009	Harford County Division of Emergency Operations, Linda Ploener	The Planning guidance requests crosswalks to plans. EOPs should have a detailed Table of Contents. Developing detailed crosswalks for each potential hazard is unnecessary.	Noted	The explanation clarifies that the cross-reference required is specific to plan areas addressing the NUREG-0654/FEMA-REP-1 criteria. This requirement facilitates plan maintenance and evaluation of regulatory compliance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Criterion P.8	FEMA-2008-0022-0088-003	Anonymous	Page II-156, lines 116-19, Criterion P.8: "The cross-reference table should be specific – it should address each criterion element and provide references to specific subparts of the plan. The cross-reference should not merely indicate, for example, a plan chapter containing dozens of pages; it should reference sections specific enough to allow reviewers to quickly locate the relevant information." In addition, it should be emphasized that a detailed cross-reference facilitates updating of the plans and helps avoid the common situation of a piece of information being updated in one section of the plan but not in another.	Accepted	The REP Program Manual has been amended as suggested. See the Explanation section of Evaluation Criterion P.8 in Part II.C - Planning Guidance.
Criterion P.10					
Criterion P.10	FEMA-2008-0022-0088-004	Anonymous	Page II-157, Criterion P.10: "Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly." In addition, periodic update of maps and ingestion pathway information such as the lists of food processors in the EPZ should be mentioned. Regular updating of maps was addressed in GM PR-1 but is not highlighted in the new manual.	Modified	Suggested information added to P.4. See the bullet list under Evaluation Criterion P.4 in Part II.C - Planning Guidance.
Part II.D					
Part II.D	FEMA-2008-0022-0093-021	Texas Department of State Health Services, Bob Free	Part II.D, Page II-158 – REP Program Planning Guidance: Conducting Plan Reviews. Correction of reference in line 36. Line 36 sentence "See Part IV.H, FEMA REP Program Administration: Conducting Plan Reviews for additional information" provides an incorrect reference to the reader. Part IV.F describes conducting plan reviews. Part H describes EPZ Boundary Changes. Change "Part IV.H" to "Part IV.F" in order to provide a correct reference. All of Part II.D should be moved to Part IV.F (or vice-versa) in order to exclude statements that are repeated in both Parts.	Accepted	The REP Program Manual has been amended as suggested. See Part II.D Conducting Plan Reviews has been moved to Part IV.M Conducting Plan Reviews.
Part II.D	FEMA-2008-0022-0106-071	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page II-159: Conducting Plan Reviews: Lines 1 - 36Comment: As FEMA is serving as a "Regulator" here, a process needs to be established to allow for the appeal any finding other than "Adequate: Contents of the REP Plan are consistent and in full compliance with the plan requirements delineated in the stated NUREG-0654/ FEMA REP-1 evaluation criterion/critera." The process must include the ability to appeal to FEMA Headquarters and if need be, an Administrative Law Judge.Potential Impact: Without an appeal process, the "findings" can be very subjective and lead to one FEMA Region approving a plan while another FEMA Region disapproves basically the same plan contents. An Appeal process can lead to overall guidance for the whole REP program as well.	Noted	44 CFR Part 350.15 outlines the appeal process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
PART III - REP Program Exercise Guidance					
III.A.1 - Purpose and Scope					
III.A.1 - Purpose and Scope	FEMA-2008-0022-0118-001	State of Iowa, Department of Public Defense-Homeland Security and Emergency Management Division, David Miller	We acknowledge that integrating the Homeland Security Exercise and Evaluation Program(HSEEP) and Radiological Emergency Preparedness (REP) Program has the potential to achieve program efficiencies by reducing exercise fatigue through combining multiple requirements into fewer total exercises as well as reducing scheduling conflicts by bringing the REP Program schedule into the National Exercise schedule. However, we believe that this attempt at integration, in its current scope, constitutes an unnecessary overhaul ofthe program. FEMA can easily achieve the above mentioned efficiencies through only minor modifications to the REP program. Other stated objectives of integration are quite simply unnecessary and may not be in the best interest of the program. Since its inception, the REP program has served as a stand-alone exercise program that has been developed over the years to serve a very specific purpose. That purpose is to ensure the safety and health of the public is protected through proper emergency preparedness planning as it relates to the nation's commercial nuclear power plants. As a result ofthe unique purpose and nature of the program, which involves regulation by multiple federal agencies and close coordination between public and private entities, the exercise design, conduct, evaluation, and improvement planning requirements have been tailored to specifically meet the needs of the program. Integrating a well-developed and proven program, such as the REP program, with a program that is in its infancy will almost certainly decrease the overall effectiveness of the REP program. The stated purpose of the HSEEP program is to provide a capability to respond to all conceivable hazards uniformly, is in stark contrast to the purpose ofthe REP Program.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.A.1 - Purpose and Scope	FEMA-2008-0022-0130-003	State of Vermont, Barbara Farr	The REP exercise and program movement towards HSEEP integration. HSEEP is the National Standard and this process should go forward, but there needs to be some type of time frame associated with it.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.A.2 - Contents and Organization					
III.A.2 - Contents and Organization	FEMA-2008-0022-0113-106a	**North Carolina Division of Emergency Management, Stephen Payne**	Page III-1, Line 25RECOMMENDATION/COMMENT:INSERT THE FOLLOWING:Through HSPD-8, the President directed the establishment of a National Exercise Program to integrate national-level exercise activities. Through the methods and tools that form the Homeland Security Exercise Evaluation Program (HSEEP), exercise scheduling, design, development, conduct, and evaluation is aligned and standardized. In order to be HSEEP compliant, an exercise must:§ Be scheduled through the use of an annual Training and Exercise Plan Workshop (T&EPW) and Multi-year Training and Exercise Plan;§ Be planned and conducted in accordance with the guidelines set forth in HSEEP Volumes I-III;§ Result in a properly formatted After-Action Report/Improvement Plan (AAR/IP); and§ Include tracking and implementing of corrective actions identified in the AAR/IP.	Modified	**This section of the REP Program Manual has been re-written for clarity. The term "compliant" has been deleted. See Part III.A.1 - REP Program Demonstration Guidance, Introduction, Background.**
III.A.2 - Contents and Organization	FEMA-2008-0022-0113-106b	North Carolina Division of Emergency Management, Stephen Payne	(Continued) In concert with the national Exercise Plan (NEP), REP exercises will follow the HSEEP policy and guidance for exercise program management, design, development, conduct, evaluation, and improvement planning. Integrating HSEEP and REP will achieve program efficiencies by:§ Ensuring REP compliance with elements of HSPD-5, HSPD-8, and PKEMRA;§ Standardizing exercise design, conduct, evaluation, and improvement planning requirements among all FEMA Regions and evaluation team members; § Reducing scheduling conflicts by bringing the REP Program into the National Exercise Schedule; § Reducing exercise fatigue by combining multiple requirements into fewer total exercises; andProviding a suite of standardized tools for scheduling, planning, information sharing, and evaluation/corrective action. Such integration will not, however, establish any additional exercise requirements for the REP Program or replace existing REP evaluation criteria with new capabilities.	Modified	This section of the REP Program Manual has been re-written for clarity. The term "compliant" has been deleted. See Part III.A.1 - REP Program Demonstration Guidance, Introduction, Background.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.A.2 - Contents and Organization	FEMA-2008-0022-0113-107	North Carolina Division of Emergency Management, Stephen Payne	Page III-2, Line 3 RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"References:1. HSEEP Volume I: HSEEP Overview and Exercise Program Management, February 2007.2. HSEEP Volume II: Exercise Planning and Conduct, February 2007.3. HSEEP Volume III: Exercise Evaluation and Improvement Planning, February 2007.4. HSEEP Prevention Exercises, March 28, 2008.	Rejected	These references are listed elsewhere in the document.
III.A.2 - Contents and Organization	FEMA-2008-0022-0119-009	Progress Energy, Kenneth Heffner	Licensees are only responsible for REP objectives, not HSEEP. Will two scenarious be needed for approval submission and will the NRC and FEMA be required to approve the on-REP portion?	Noted	The utility works with the OROs to develop a single scenario that meet the needs of all involved entities. REP and HSEEP objectives are not different. FEMA has provided this comment to the NRC for situational awareness.
III.A.2 - Contents and Organization	FEMA-2008-0022-0108-188	Louisiana Department of Environmental Quality, Cheryl Chubb	Comment: The "Abbreviations and Acronyms Used in REP" appears to be missing HSEEP acronyms. IP - note there is an IP already referenced, but one is implementing procedure and the other should be Improvement Plan. Also missing: NEXS, T&EPW, IPC, C/E, ED, AAR/IP. This selection is from pages III-3 and III-4. Please review the manual and include all abbreviations and acronyms used.	Modified	HSEEP terms applicable to REP have been added to glossary. See Appendix B - Gloassary of REP Terms.
III.A.2 - Contents and Organization	FEMA-2008-0022-0073-054	Washington Military Department Emergency Management Division, Jim Mullen	The HSEEP process is referred to throughout this entire section; however the Draft REP Manual does not go so far as to totally incorporate the Exercise Evaluation Guides (EEGs), the Target Capabilities List, or the Universal Tasks List.Potential Impact: RECOMMENDATION: The REP program should reflect the most up to date Department of Homeland Security exercise planning and evaluation methodologyComment By: State Department of Health	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.A.2 - Contents and Organization	FEMA-2008-0022-0122-001	Emergency Management and Homeland Security Division , James Porcello	HSEEP Integration: The framework for HSEPP integration and implementation is not clear. Does FEMA intend that all aspects of HSEEP be used in the REP Program? If so, then the Off-site Response Organizations (OROs) should not conduct full-scale exercises every two years, but rather use the HSEEP 'building block' approach to exercising over a five year period, with increasingly complex exercises leading up to a full scale exercise in the fifth year. Actually, this might not be a bad idea. The OROs could develop a suite of increasing complex briefings and seminars (for new plans and procedures), tabletops, drills, functional and the capstone full-scale exercise that would more then adequately allow the OROs to demonstrate 'reasonable assurance' over the five years while moving away from both negative training and the predictability of the current exercise regime.)	Modified	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.A.2 - Contents and Organization	FEMA-2008-0022-0122-002	Emergency Management and Homeland Security Division , James Porcello	there seem to be structural conflicts between HSEEP Exercise requirement/compliance and REP regulatory requirements. If the intent is to use the HSEEP process in conducting REP exercises, a separate REP annex to HSEEP would probably work better. If the desire is to simply use the HSEEP Toolkit to plan , conduct, and evaluate exercises within the current six year cycle and to post all documents in NEXS, they the authors should state that as their goal.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

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III.A.2 - Contents and Organization	FEMA-2008-0022-0110-043	Alabama Emergency Management Agency, J Frank Price	page III-3, lines 1-3: This referred to the planning mythology use by HSEEP. In the current REP criteria the scenario is based on the exercise cycle	Noted	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.A.2 - Contents and Organization	FEMA-2008-0022-0108-009	Louisiana Department of Environmental Quality, Cheryl Chubb	How does HSEEP define "exercise" as opposed to FEMA's definition of "exercise?"	Noted	There are minor differences, as REP is a subset of all exercises. See the REP Program Manual glossary for the definition that includes REP-specific aspects. For the REP Program, the definition of "REP exercise" in the glossary is applicable. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones					
Exhibit III-1: Milestones	FEMA-2008-0022-0020-043	Ashtabula County EMA, George Rolland	Page Ref. III-3 Comment: Milestones for REP Exercise Process has several changes to Time actions/items due prior to the exercises; e.g. # of days prior to EX to submit 'Objectives' document. "100-day meeting" now "175-day meeting"? Potential Impact: 100-day meeting for Extent of Play/Objectives meeting is now at 175-days?	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A milestone for submitting scenario and source information to FRMAC has been added at 120 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0021-043	Geauga County DES, Dale Wedge	Page Ref. III-3 Comment: Milestones for REP Exercise Process has several changes to Time actions/items due prior to the exercises; e.g. # of days prior to EX to submit 'Objectives' document. "100-day meeting" now "175-day meeting"? Potential Impact: 100-day meeting for Extent of Play/Objectives meeting is now at 175-days?	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A milestone for submitting scenario and source information to FRMAC has been added at 120 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0036-043	Lake County EMA, Larry Greene	Page Ref. III-3 Comment: Milestones for REP Exercise Process has several changes to Time actions/items due prior to the exercises; e.g. # of days prior to EX to submit 'Objectives' document. "100-day meeting" now "175-day meeting"? Potential Impact: 100-day meeting for Extent of Play/Objectives meeting is now at 175-days?	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A milestone for submitting scenario and source information to FRMAC has been added at 120 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0073-080	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-3 and III-15Comment: Line 16, Exhibit 111-1: Milestones for REP Exercise Process and paragraph 2.b., lines 20-26. At the 2008 National REP Conference, the FRMAC announced that in order for them to have enough time to develop any requested simulated products (e.g. AMS f1yover plots) they must have the final scenario data at least 90 days prior to the exercise date. Recommend adjust the timeline to reflect an approved scenario no later than the Mid-term Planning Conference (MPC.)Potential Impact: The scenario review should be completed prior to the 90 day mark so that the data can be provided to FRMAC to meet their exercise needs.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A milestone for submitting scenario and source information to FRMAC has been added at 120 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones	FEMA-2008-0022-0087-014	South Carolina Emergency Management Division, Danny Loomis	Page 111·3: Recommend the following changes to the milestone timeline:The 175 day no later than time frame should be changed to 150 days, based on the recommended time for an initial planning conference which is 180 days. That gives the planning committee approximately 20 workdays to have a task completed and make necessary comments based on previous exercises.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The cited milestone has been changed. Exercise objectives and Evaluation Areas should be brought to the Initial Planning Conference. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0113-108	North Carolina Division of Emergency Management, Stephen Payne	Page III-3, Exhibit III-1 RECOMMENDATION/COMMENT:An additional column is necessary to indicate what organization – Federal (FEMA/NRC), State, Local or NPP (Utility) is responsible for the applicable milestone.	Accepted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A column indicating the organization responsible for the milestone has been added as suggested. See Part III.B - REP Exerice Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0078-089	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-3 Changing the timelines for the submission and review of milestone requirements creates an unnecessary burden to the REP exercise program in trying to meet those deadlines.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0086-037	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page 111-3, line 16: provides Exhibit 111-1: Milestones for REP Exercise Process (Exhibit 111-1). Comments: The HSEEP milestones listed prior to following the exercises are greatly extended for the period prior to actual exercise date. This will involve considerably more meetings and planning activities and will have a large impact upon participating OROs.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical.This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0087-017	South Carolina Emergency Management Division, Danny Loomis	Page III-3: NOTE: These milestones should be guidelines,and treated as such by FEMA, state, and local planning entities.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones	FEMA-2008-0022-0106-072	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-3, Line 16 thru Page III-4 to Line 1Comment: While most would assume "Milestones" are goals to be strived for , there is nothing delineating this fact and some may intrepret the Milestones as "Mandatory" which some in FEMA are already alluding to. There are real-world events that could preclude the milestones from being met such as tornadoes, hurricanes such as Katrina or flooding as happened in and around Cedar Rapids, IA that would require all personnel and time dedicated toward such events and not planning for REP exercises.Potential Impact: Adding more anomosity between the NRC and FEMA and the States and Locals.	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A milestone for submitting scenario and source information to FRMAC has been added at 120 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0078-090	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-3 What is the purpose for developing both an EXPLAN and an Extent of Play Agreement? This appears to be to be a wasteful process of creating to very similar documents in two different formats.	Noted	There is only one document - the Extent of Play is part of EXPLAN.
Exhibit III-1: Milestones	FEMA-2008-0022-0078-091	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-3 (Almost) doubling the pre-exercise milestone requirements adds to the difficulties in producing a successful REP exercise with no added benefit to those directly involved with developing and participating in the exercise.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical.This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0078-092	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-3 Under HSEEP the federal agencies would also be required to participate in these meetings and they have not been able to in the past because of travel costs.	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical.This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones	FEMA-2008-0022-0087-015	South Carolina Emergency Management Division, Danny Loomis	Page III-3: The no later than 170 days should be changed to 90 days for the Final state and local plans submitted to region, unless a later time frame Isapproved bythe region chair.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The milestone for submitting approved plans to the FEMA Region has been moved to 90 days. It is not uncommon for OROs to conduct drills and amend their plans/procedures in the period leading up to the exercise. There has to be a cutoff date to ensure that players and evaluators are using the same version of the plans/procedures. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0087-016	South Carolina Emergency Management Division, Danny Loomis	Page III-3The no later than 75 days should remain the same for FEMA and NRC to complete the review of the evaluation areas and extent of play agreements, and not be changed to 145 days.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The milestones regarding extent of play development have been changed. The ExPlan (including the extent of play) is developed following the Initial Planning Conference (180 days) and reviewed at the Mid-term Planning Conference (90 days). FEMA completes its review of this document at 75 days. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0093-026	Texas Department of State Health Services, Bob Free	Exhibit III-1: Milestones for REP Exercise Process, Page III-3&4, and Page III-27 Lines 17-21 – Conflicts with the HSEEP Exercise Planning Timeline (HSEEP Vol. 1 Page C-7) Obvious conflicts between HSEEP After action meetings and 44 CFR 350 requirements for participants meetings should be resolved. FEMA guidance should require that the participants meeting be scheduled so that there is sufficient time for identification of issues to be presented by FEMA at the meeting. The purpose of this requirement is to provide specific information for OROs to hear accurate reports and provide comment if needed. This could be accomplished by allowing time for coordination with FEMA headquarters during the morning of day 2.	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The suggested milestone for the participants' meeting has been moved back to ED+3. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones	FEMA-2008-0022-0105-015	Tennessee Emergency Management Agency, Gary Lima	HSEEP 18 month planning mile stones are not conducive to REP annual cycles of 12 months. Reaching back 18 months will cause one (1) exercise planning cycle to land on another, causing the same number of staff to be involved in preparing for two (2) graded exercises. Tennessee has a dress rehearsal (drill) exercise prior to a graded, which means two (2) overlapping preparation exercise windows competing with two (2) graded running parallel for at least six (6) months during a scheduled singular nuclear plant "on year."	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0108-151	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-3/III-4 Line: NA/18 Comment: Exercise dates are established years in advance. The statement regarding no less than 1 year is out of place and unnecessary.	Noted	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. A footnote has been added to the cited milestone indicating that for changes to an exercise date due to extenuating circumstances, notice should be given to Region as soon as possible. This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0113-110	North Carolina Division of Emergency Management, Stephen Payne	Page III-3, Exhibit III-1 RECOMMENDATION/COMMENT: DELETE BASIS:Region should have current copies of the NPP response plans on file. There is no need for a "final" plan to be sent.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The milestone for submitting approved plans to the FEMA Region has been moved to 90 days. It is not uncommon for OROs to conduct drills and amend their plans/procedures in the period leading up to the exercise. There has to be a cutoff date to ensure that players and evaluators are using the same version of the plans/procedures. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.
Exhibit III-1: Milestones	FEMA-2008-0022-0113-109	North Carolina Division of Emergency Management, Stephen Payne	Page III-3, Exhibit III-1RECOMMENDATION/COMMENT: deleteBASIS:This milestone presumes that a contractor will be used for exercise development activity. This has been accomplished for the past 30 years by OROs without this support – why is it needed now? With current economic conditions, no State or Local ORO has the funding to contract exercise development activity.	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The contractors mentioned in the cited REP Program Manual text are Federal evaluators. FEMA is not presuming that States use contractors to develop exercises. See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-1: Milestones	FEMA-2008-0022-0073-055	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-3Comment: Line 16, Exhibit 111-1: Milestones for REP Exercise Process. The Exhibit shows that the draft exercise scenario is due to FEMA for review 60 days prior to the exercise. FEMA then has 10 days to review before approval is given. However, the MSEL development takes place 100 days prior to exercise date. This does not make sense. We feel that it would be more logical to know what the approved exercise scenario is before we can develop a good, effective MSEL. Recommend change the exercise scenario approval process so that it is approved no later than the 100 day mark.Potential Impact: The exercise development group cannot develop good a MSEL until they know what the approved scenario is.	Noted	Because of certain unique aspects of REP exercises, the relationship between the scenario and the MSEL is not the same as in a typical HSEEP exercise. A REP scenario deals with technical events onsite only. Offsite play is reactive to the events and actions onsite, rather than directly to the scenario. Because the technical scenario does not include offsite play, it can be finalized after the MSEL has been created. The two can then be reconciled for the few items that need it, e.g., approximate times of ECL declarations. Traditionally, REP MSELs have been limited to specific functions or agencies, but fuller MSELs can be developed if desired.
Exhibit III-1: Milestones	FEMA-2008-0022-0129-037	Wisconsin Emergency Management, Teri Engelhart	Page: III-4, Line: Timeline Comment: Please provide an explaination of the "44 CFR 350 approval process meeting	Modified	Exhibit III-1 has been re-examined in light of comments received and modified as appropriate. These are suggested milestones, and some are more flexible than others. The table has also been modified to indicate where adherence to the suggested milestones is more critical. The cited milestone has been deleted because it is captured in the previous milestone, "Conduct post-exercise meeting that includes the public." See Exhibit III-1: Milestones for the REP Exercise Process in Part III.B - REP Exercise Process. Also, see 44 CFR Part 350.9 (a), (d) and (e).
III.B.1 - Scheduling REP Exercises					
multi-year scheduling coordination					
multi-year scheduling coordination	FEMA-2008-0022-0087-018	South Carolina Emergency Management Division, Danny Loomis	Page 111-6 (line 6): Need to identify who will be the responsible party for entering the exercises into the NEXS (Ie. FEMA, state).	Modified	The cited REP Program Manual text has been clarified. The following sentence has been added: "Per FY ’05 and FY ’06 Homeland Security Grant Program guidance, State Administrative Agencies (SAAs) are required to schedule all exercises through the NEXS System, so that it can accurately reflect all the exercises (e.g., REP, CSEPP, public health, transit, port security, etc.) occurring throughout the nation.” See Part III.B - REP Exercise Process, Section 1.C - The Training and Exercise Plan Workshop.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
multi-year scheduling coordination	FEMA-2008-0022-0113-111	North Carolina Division of Emergency Management, Stephen Payne	Page III-4, Line15-16 RECOMMENDATION/COMMENT:With the need to expand the REP exercise cycle to as much as ten (10) years, such coordination could be difficult. It is foreseeable that efforts could be made to force REP into a 5-year cycle to fit with NEP timelines. Such activity would be detrimental to the REP exercise program.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
full/partial participation					
full/partial participation	FEMA-2008-0022-0108-152	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-5 Line: 14-15 Comment: Define "primarily." What other demonstrations may be omitted during partial participation?	Modified	See definition of partial participation exercise in REP Program Manual glossary. See Appendix B - Glossary of REP Terms.
full/partial participation	FEMA-2008-0022-0078-093	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-5 Lines 16-21 This addresses home rule states, but makes no mention of States whose decision making rests with the State and not the Counties	Modified	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate.
full/partial participation	FEMA-2008-0022-0100-023	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-5, Lines 22-24 define the time requirements for participation in ingestion exercises as every six years and rotated between all sites within a state. Pennsylvania appreciates the opportunity to rotate between all sites within the state due to the presence of five nuclear power plant sites.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
full/partial participation	FEMA-2008-0022-0080-022	Douglas Fleck	Page III-5, Lines 22-24 define the time requirements for participation in ingestion exercises as every six years and rotated between all sites within a state. In Pennsylvania there are five nuclear power plant sites. A rotation through all five will take thirty years. In thirty years one could easily see a 100% change in participants at every one of the OROs that would be evaluated. In all likelihood the evaluators themselves would be long gone before a second evaluation at a site. What possible training and experience benefit does FEMA see coming from participating in an exercise once every thirty years? Additionally the ingestion counties that play in these exercises receive a very unrealistic evaluation with little training value. A county that has not been involved with REP for thirty years is suddenly told they have a radiation “footprint” within their boundaries and they need to react to disjointed injections concerning crops, industry, and relocation. They have no idea where their citizens or even themselves were evacuated to. They have no idea how they were monitored and cleared of radiation. All in all this makes for a very unrealistic “check the block” style of exercise. Instead of pounding the same risk and support counties time after time on the same exact criteria with a canned and predictable biennial exercise maybe it is time to devote some exercise and training assets into everything that has to happen if radiation goes beyond the mythical ten mile radius. The actions taken by a state for a REP ingestion exercise are not particularly different than those taken for any type of long term contamination event. Right now it is the ingestion and support counties that are unprepared if radiation deposition should suddenly occur in their jurisdictions.	Modified	Jurisdictions can undertake expanded or additional exercises at their own initiative. FEMA's mandate includes supporting exercises other than biennial exercises. See the Explanation section of Evaluation Criterion N.1.d in Part II.C - Planning Guidance.
full/partial participation	FEMA-2008-0022-0080a-021a	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-5, Lines 22-24 define the time requirements for participation in ingestion exercises as every six years and rotated between all sites within a state. In Pennsylvania there are five nuclear power plant sites. A rotation through all five will take thirty years. In thirty years one could easily see a 100% change in participants at every one of the OROs that would be evaluated. In all likelihood the evaluators themselves would be long gone before a second evaluation at a site. What possible training and experience benefit does FEMA see coming from participating in an exercise once every thirty years? Additionally the ingestion counties that play in these exercises receive a very unrealistic evaluation with little training value.	Modified	Jurisdictions can undertake expanded or additional exercises at their own initiative. FEMA's mandate includes supporting exercises other than biennial exercises. See the Explanation section of Evaluation Criterion N.1.d in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
full/partial participation	FEMA-2008-0022-0080a-021b	Pennsylvania Emergency Management Agency, Douglas Fleck	(Continued) A county that has not been involved with REP for thirty years is suddenly told they have a radiation “footprint” within their boundaries and they need to react to disjointed injections concerning crops, industry, and relocation. They have no idea where their citizens or even themselves were evacuated to. They have no idea how they were monitored and cleared of radiation. All in all this makes for a very unrealistic “check the block” style of exercise. Instead of pounding the same risk and support counties time after time on the same exact criteria with a canned and predictable biennial exercise maybe it is time to devote some exercise and training assets into everything that has to happen if radiation goes beyond the mythical ten mile radius. The actions taken by a state for a REP ingestion exercise are not particularly different than those taken for any type of long term contamination event. Right now it is the ingestion and support counties that are unprepared if radiation deposition should suddenly occur in their jurisdictions		
full/partial participation	FEMA-2008-0022-0129-038	Wisconsin Emergency Management, Teri Engelhart	Page: III-5, Line: 22 - 30 Comment: "Partial participation by a state in ingestion pathway activities at sites within that state is not required." (Line 25) This paragraph lacks clarity and continuity. It is not clear what the requirements are for states with multiple sites, or for states that sit between 10 and 50 miles of a nuclear power plant located in a bordering state. It would be beneficial to have this entire paragraph rewritten.	Modified	REP Program Manual language has been modified for clarity. The cited text is general guidance. Specific determination of which entities need to participate in a given exercise is determined on a Regional basis. See Pat III.B - REP Exercise Process, Section 1.a.1 - Scheduling REP Activities, Activity Types, Exercises. Also, see the Frequency of Exercises subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
full/partial participation	FEMA-2008-0022-0108-153	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-5 Line: 24-25 Comment: "Partial participation by a State in ingestion pathway exercises at sites within that State is not required." This does not make sense. Shouldn't it reflect that partial participation by a State during an IPX is not an option and that full participation is necessary?	Modified	REP Program Manual language has been modified for clarity. The cited text is general guidance. Specific determination of which entities need to participate in a given exercise is determined on a Regional basis. See Pat III.B - REP Exercise Process, Section 1.a.1 - Scheduling REP Activities, Activity Types, Exercises. Also, see the Frequency of Exercises subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
full/partial participation	FEMA-2008-0022-0122-009	Emergency Management and Homeland Security Division , James Porcello	page 111-6, lines 1 and 2. FEMA should replace "organizations" with "organizations with field sampling responsibilities".	Accepted	The REP Program Manual has been amended as suggested. Please see Evaluation Criterion N.1.d. in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
full/partial participation	FEMA-2008-0022-0078-094	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-6 Lines 1-2 This Language should be clarified to explain that this applies only to organizations that have field monitoring teams.	Accepted	The REP Program Manual has been amended as suggested. Please see Evaluation Criterion N.1.d. in Part II.C - Planning Guidance.
full/partial participation	FEMA-2008-0022-0108-154	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-6/III-29 Line: 12-14/21-23 Comment: If the AAR is due to the States within 30 days of the exercise, how can you include any out-of-sequence demonstrations in the same report when it is scheduled 30 days after the exercise. If a demonstration is 60 days before the exercise, the State would not receive a draft report for it until 90 days after the demonstration. Recommend reconsidering the 60 days prior and 30 days after.	Noted	States have flexibility in scheduling the dates of OOS demonstrations.
III.B.2 Designing/ Developing Exercises					
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0121-103	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -6 Line: 17-20 Comments: Part II E 7 Grammar Error. The word "it" at the end of the line should be deleted. It should be emphasized and made clear in this guidance that the organizations involved in scenario design be kept to only the absolutely essential ones and that they keep the scenario confidential especially to other people in their own organization.	Modified	This section of the REP Program Manual has been rewritten and expanded. The cited sentence has been deleted. See Part III.B - REP Exercse Process, Section 2.a. - Conducting Pre-Planning Activities, Establish an Exercise Planning Team.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0106-015	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 8Comment: Ref IV. Lines 1 and 2. Anticipatory responses and preconditioning of exercise participants. All training conducted for a potential radiological release is designed to precondition responders to tasks that will have to be accomplished during drill, exercise or actual response to a radiological release affecting OROs. During extent-of-play (EOP) development, FEMA has been the driving force behind most of the listed "predictable features" included in the supplement. This is not likely to change unless FEMA becomes part of the HSEEP team that will develop biennial exercises. This will cause FEMA to abandon Guidance Memorandum # 8 and become a team player. Since Regional FEMA Headquarters now have dedicated Planners designated as the lead for each plant, that Planner should become part of the development team. This will preclude the usual back-and-forth between FEMA, the State, the local jurisdictions and the Licensee that comes after initial submission of scenario and extent of play documents. "Enhancements to Emergency Preparedness" means greater regulatory control, hence additional requirements in the development and progress of exercises. The guise of FEMA becoming an evaluator of "all-hazards" events will require additional staffing to properly evaluate biennial exercises. Much of this evaluation is actually within the realm of the State of Texas who has been designated to certify NIMS compliance by local jurisdictions.	Noted	FEMA has been part of the planning process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0106-078	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION:Comment: GENERAL QUESTIONS: Who will be coordinating and conducting the planning conferences? Who will be choosing the exercise objectives? Who will oversee the After Action Reviews? Who will validate the evaluation process? (NRC, FEMA, State, Locals or Licensee?)	Noted	The State is the lead entity for REP exercises, unless another ORO is appropriate due to local authority structures. Ideally, members of the planning team should not be players. The trusted agent shall not participate as a decision-maker. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0128-031	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-6, line 18: "…Exercise Planning Team (EPT), led by the State(s) but including licensee,…." COMMENTs: Not all States lead the exercise design team for ORO's.Explanation/recommendation: Recommend modifying guidance to state EPT, led by lead ORO, but including the licensee and other ORO jurisdictions.	Modified	REP Program Manual language has been amended to read, "…Exercise Planning Team (EPT), led by the State(s) (or designee) and including the licensee, OROs, and FEMA REP staff." See Part III.B - REP Exercse Process, Section 2.a. - Conducting Pre-Planning Activities, Establish an Exercise Planning Team.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0097-080	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-6 (line 18):COMMENT: Descripton of exercise planning team is not applicable to the design and development of REP Exercises; therefore delete reference.BASIS: REP Exercise scenarios are specifically prescripted within a planning cycle and as such, HSEEP EPT concept does not apply in the current REP evaluated exercise planning cycle	Rejected	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0116-090	Nuclear Energy Institute, Alex Marion	Part III.B.2 pg III-6 (line 18): "…Exercise Planning Team (EPT), led by the State(s) but including licensee,…." Part III.B.2 pg III-6 (line 18): Descripton of exercise planning team is not applicable to the design and development of REP Exercises; therefore delete reference.Basis: REP Exercise scenarios are specifically prescripted within a planning cycle and as such, HSEEP EPT concept does not apply in the current REP evaluated exercise planning cycle	Rejected	FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0106-028	Nebraska Emergency Management Agency, Jonathan Schwarz	FEMA REP should have a Planner included in the HSEEP planning process who has authority to make decision concerning scenario and EOP development and approval.	Noted	The commenter's suggestion is already being done.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0106-009	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact: Severe manpower and fiscal constraints for ORO local jurisdictions to meet HSEEP planning requirements. Small Nebraska counties do not have the luxury to have excess planners to become dedicated planners and not perform operational assignments during an emergency drill or exercise.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0110-038	Alabama Emergency Management Agency, J Frank Price	page III-6, lines 27-34: Reference is given to develop evaluation process using HSEEP (NIMS/ICS should also apply). To make sure all evaluated criterion that is evaluated is consistence a list of EEGs and should also be developed as an attachment to this manual that can be used by all planners and exercise designers and can referenced in planning the exercise. Without a toolkit (with a list of EEGs) FEMA can determine if exercise EEGs are acceptable after the exercise is planned. Each REP plan will be unique and have some specific EEGs but, many are common to all REP and common EEGs could be in the toolkit for use.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0087-019	South Carolina Emergency Management Division, Danny Loomis	Page 111-6 (lines 27-34): It Isn't clearly outlined how the DHS TCl's correspond with the actions outlined in NUREG0654/FEMA-REP-1. Arethere going to bea set of TCLs specifically designed for REP evaluated exercises? When?	Modified	The REP Program Manual has been revised to explain the relationship between the TCL and REP Evaluation Area criteria. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0086-036	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Page 111-6, lines 30·38 state: "Similar to these NEP exercises, the purpose of REP exercises is to verify the capability of OROs to implement various aspects of their response plans. However, REP exercise objectives and capabilities are mandated by the Planning Standards of NUREG-0654/FEMA-REP-1. The REP exercise Evaluation Area criteria in Part III of this manual restate, in a functional manner, those Planning Standards that apply to offsite operations. All the major elements of these Planning Standards are to be tested through exercises at least once every 6 years. Exhibit 111-2, "Federal Evaluation Process Matrix," provides a crosswalk between the Evaluation Criteria and other requirements to NUREG-0654/FEMA-REP-1, and identifies the minimum frequency for which each evaluation area criteria should be demonstrated and by whom". Comments: FEMA should clearly state what it intends to use for making a "Reasonable Assurance" determination based on exercise outcomes – will such determination rely upon the Exercise Evaluation process or HSEEP? This should be more clearly stated.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0102-044	Entergy Nuclear Operations, Inc., Michael Slobodien	Page III-6, lines 30-38 states: "Similar to these NEP exercises, the purpose of REP exercises is to verify the capability of OROs to implement various aspects of their response plans. However, REP exercise objectives and capabilities are mandated by the Planning Standards of NUREG-0654/FEMA-REP- 1. The REP exercise Evaluation Area criteria in Part III of this manual restate, in a functional manner, those Planning Standards that apply to offsite operations. All the major elements of these Planning Standards are to be tested through exercises at least once every 6 years. Exhibit III-2, "Federal Evaluation Process Matrix," provides a crosswalk between the Evaluation Criteria and other requirements to NUREG-0654/FEMA-REP-1, and identifies the minimum frequency for which each evaluation area criteria should be demonstrated and by whom".Comments: FEMA should clearly state what it intends to use for making a "Reasonable Assurance" determination based on exercise outcomes – will such determination rely upon the Exercise Evaluation process or HSEEP?	Noted	HSEEP does not affect reasonable assurance determination. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0100-024	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-6, Lines 31-34 states that REP exercises objectives and capabilities are mandated by NUREG-0654/FEMA-REP-1. Prior to that it states that NEP exercise capabilities to be evaluated are derived from the Exercise Evaluation Guides (EEGs). The EEGs are currently being developed and pilot tested. Not all REP partners have had the opportunity to review the EEGs. We respectfully request that the REP EEGs be made available for review and comment prior to final adoption of this REP Program Manual.	Noted	EEGs are available and can be customized. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0080-023	Douglas Fleck	Page III-6, Lines 31-34 states that REP exercises objectives and capabilities are mandated by NUREG-0654/FEMA-REP-1. Prior to that it states that NEP exercise capabilities to be evaluated are derived from EEGs. It is strange that the same organizations pushing HSEEP seem incapable of changing NUREG-0654/FEMA-REP-1 considering that they are the prime movers of both. Any neutral observer can easily see that REP is not currently in congruence with the HSEEP concept. It seems that rather than try to modernize REP evaluations to be synchronized with HSEEP, FEMA has instead chosen to claim that REP is mandated by the NUREG (that they helped author) and therefore will remain unique among all other programs. FEMA will pick and choose the parts of HSEEP it wants to comply with. Every variance, be it terminology or policy, will be called a minor modification only done in order to comply with the utterly unchangeable provisions of NUREG-0654. It appears REP cannot even make the very simple modification of at least calling their evaluation criteria EEGs in compliance with HSEEP. The REP program should be forced into full adoption of HSEEP just like every other national program. Until this happens REP will only be HSEEP compliant if we pretend it is. No counties and states should have to learn two methods of conducting federal evaluations.	Noted	The REP Program cannot be entirely no-fault or self-evaluated. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0080a-022	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-6, Lines 31-34 states that REP exercises objectives and capabilities are mandated by NUREG-0654/FEMA-REP-1. Prior to that it states that NEP exercise capabilities to be evaluated are derived from EEGs. It is strange that the same organizations pushing HSEEP seem incapable of changing NUREG-0654/FEMA-REP-1 considering that they are the prime movers of both. Any neutral observer can easily see that REP is not currently in congruence with the HSEEP concept. It seems that rather than try to modernize REP evaluations to be synchronized with HSEEP, FEMA has instead chosen to claim that REP is mandated by the NUREG (that they helped author) and therefore will remain unique among all other programs. FEMA will pick and choose the parts of HSEEP it wants to comply with. Every variance, be it terminology or policy, will be called a minor modification only done in order to comply with the utterly unchangeable provisions of NUREG-0654. It appears REP cannot even make the very simple modification of at least calling their evaluation criteria EEGs in compliance with HSEEP. The REP program should be forced into full adoption of HSEEP just like every other national program. Until this happens REP will only be HSEEP compliant if we pretend it is. No counties and states should have to learn two methods of conducting federal evaluations	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0113-112	North Carolina Division of Emergency Management, Stephen Payne	Page III-6, Line 35-36 RECOMMENDATION/COMMENT: DELETEBASIS:With the increase in types and response elements for REP exercises, stipulation of a specific time period for exercises is still to be determined. Specification of a time period should be delayed until determination of the appropriate time period is made through discussion between Federal, State, Local and Utility partners.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
III.B.2 Designing/ Developing Exercises	FEMA-2008-0022-0113-113	North Carolina Division of Emergency Management, Stephen Payne	." Page III-7, Line 5 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . approval to ensure the demonstration of all criteria within the exercise cycle."Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined."	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix					
Exhibit III-2 Process Matrix	FEMA-2008-0022-0043-001	Anonymous	Each Evaluation Area criterion references the applicable NUREG planning criterion that is being validated during the extent of play. However, the relationship between some of the EA criteria and the referenced NUREG criteria are not always apparent (e.g., EA 1.a.1 references NUREG A.4, but 1.a.1 makes no mention of continuous operations). In other cases, there is inconsistency in which NUREG criteria are referenced and/or applicable criteria that should be referenced are missing. Suggest that FEMA do a thorough reveiw of the relationships between EA and NUREG criteria, and modify Part III where appropriate.	Modified	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, , Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0073-081	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-6 and Exhibit III-2Comment: Lines 36-38. The paragraph states that Exhibit 11I-2: Federal Evaluation Process Matrix provides a crosswalk between the evaluation area criteria and other NUREG requirements. It also states that the Exhibit "identifies the minimum frequency for which each evaluation area criteria should be demonstrated and by whom." Further examination of Exhibit 111-2 showed that there is no identification of who should demonstrate each exercise evaluation area.Potential Impact: Inconsistency between what is written on page 11I-6 and what is actually shown in Exhibit 11I-2. The Exhibit doesn't show who (e.g. State, Facility, JIC, At-risk jurisdiction, Ingestion Jurisdiction, Field Team, etc.) should demonstrate which evaluation area. Recommend adding an additional column to indicate who it applies to.	Rejected	The commenter's suggestion cannot be accurately implemented. Very few of the criteria could be marked with an entity that would be accurate for every EPZ due to differences in authority structures from State to State. In addition, some criteria are evaluated at one location for the decision-making portion and at another for the implementation of the decision.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-114	North Carolina Division of Emergency Management, Stephen Payne	” Page III-8 - 12 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Once per exercise cycle” BASIS:Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined.	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-116	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-12 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“All facilities must be evaluated once during the exercise cycle.” BASIS:Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined..	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0077-011	PA DEP Bureau of Radiation Protection, David Allard	Pages III-8 to 13Comment: The items listed in Criterion N.1.b on an 8 year cycle:-- Rapid Escalation-- Hostile Action are not listed in the Matrix.The 'no radiological release' or 'minimal release' scenario from Criterion N.1.b is not listed in the Matrix.	Modified	Exhibit III-2 is intended to provide information about each of the evaluation area criteria. The scenario variables such as no radiological release are not evaluation area critera, but rather part of the exercise design considerations. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-001	Anonymous	A.1.a refers to NIMS (second paragraph in EOP). It should be added to the extent of play for Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.	Noted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to NUREG-0654/FEMA-REP-1 Evaluation Criterion A.1.a has been added to Demonstration Criterion 1.a.1 and Exhibit III-2.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-002	Anonymous	A.1.e refers to activating emergency response organizations. It should be added to the extent of play for Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion A.1.e has been added to Demonstration Criterion 1.a.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-004	Anonymous	Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. Reference unclear: A.4 refers to continuous operations – no mention in Extent of Play	Accepted	Criterion A.1.a has been amended to include provisions for 24-hour operations. See Assessment/Extent of Play for Criterion 1.a.1 in Part III.C - Demonstration Guidance.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-007	Anonymous	C.6 refers to mutual aid and additional resources for HAB (last paragraph in EOP). It should be added to the reference and extent of play for Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.	Accepted	Evaluation Area Criterion 1.a.1 has been amended to include reference to NUREG-0654/FEMA-REP-1 Criterion C.6. See Criterion 1.a.1 in Part III.C - Demonstration Guidance.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-009	Anonymous	Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. Reference unclear: D.3 refers to ECL – no mention in Extent of Play	Modified	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion D.3 has been removed from Demonstration Criterion 1.a.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-026	Anonymous	Criterion 1.b.1: Facilities are sufficient to support the emergency response. Reference unclear: J.10.h refers to relocation facilities – no mention in Extent of Play	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion J.10.h has been added to Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise, Cycle Requirements. Text has been added to the Assessment/Extent of Play section for Demostration Crition 1.b.1.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-028	Anonymous	Criterion 1.b.1: Facilities are sufficient to support the emergency response. Reference unclear: J.12 refers to relocation facilities – no mention in Extent of Play	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion J.12 has been added to Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements. Text has been added to the Assessment/Extent of Play section for Demostration Crition 1.b.1.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-032	Anonymous	K.5.a refers to fixed decontamination facilities. It should be added to the reference and extent of play for Criterion 1.b.1: Facilities are sufficient to support the emergency response	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-034	Anonymous	K.5.b – refer to fixed decontamination facilities. It should be added to the reference and extent of play for Criterion 1.b.1: Facilities are sufficient to support the emergency response	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion K.5.b has been added to Demonstration Criterion 1.b.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-006	Anonymous	C.4 refers to mutual aid and additional resources for HAB (last paragraph in EOP). It should be added to the reference and extent of play for Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.	Accepted	Evaluation Area Criterion 1.c.1 has been amended to include reference to NUREG-0654/FEMA-REP-1 Criterion C.4. See Criterion 1.a.1 in Part III.C - Demonstration Guidance.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-008	Anonymous	C.6 refers to mutual aid and additional resources for HAB (last paragraph in EOP). It should be added to the reference and extent of play for Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.	Accepted	Evaluation Area Criterion 1.c.1 has been amended to include reference to NUREG-0654/FEMA-REP-1 Criterion C.6. See Criterion 1.a.1 in Part III.C - Demonstration Guidance.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-003	Anonymous	A.1.e – refers to 24-hour manning of communications. It should be added to the reference and extent of play for Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-019	Anonymous	I.7 refers to field monitoring equipment. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion I.7 has been added to Demonstration Criterion 1.e.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-020	Anonymous	I.8 refers to field monitoring equipment. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion I.8 has been added to Demonstration Criterion 1.e.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-025	Anonymous	J.10.g refers to transportation-related equipment. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, , Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-027	Anonymous	J.10.k refers to transportation-related equipment. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-029	Anonymous	J.12 refers to evacuees monitoring equipment and contamination control. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion J.12 has been added to Demonstration Criterion 1.e.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-035	Anonymous	K.5.b refers to decontamination supplies. It should be added to the reference and extent of play for Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion K.5.b has been added to Demonstration Criterion 1.e.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-031	Anonymous	K.3 refers to capabilities to assess radiation doses to EWs, and options for dose limits. It should be added to the reference and extent of play for Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-017	Anonymous	H.12 refers to ability to analyze field monitoring data. It should be added to the reference and extent of play for Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-021	Anonymous	I.8 similar to 2.b.1, refers to data collection for assessing conditions. It should be added to the reference and extent of play for Criterion 2.e.1: Timely relocation, reentry, and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the ORO's plan and/or procedures.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-018	Anonymous	H.12 – refers to ability to analyze field monitoring data. It should be added to the reference and extent of play for Criterion 2.e.1: Timely relocation, reentry, and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the ORO's plan and/or procedures.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-115	North Carolina Division of Emergency Management, Stephen Payne	." Page III-10 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Should be demonstrated in every biennial exercise by some organizations and at least once per exercise cycle by every ORO with responsibility for implementation of KI decisions." BASIS:Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined.	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-024	Anonymous	J.10.e refers to use of KI for institutionalized populations. It should be added to the reference and extent of play for Criterion 3.c.1: Protective action decisions are implemented for special populationsother than schools within areas subject to protective actions.	Rejected	KI for the general public, including persons with disabilities and access/functional needs, is evaluated under Criterion 3.b.1.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0080-024	Douglas Fleck	Page III-10, Item 3.c.2 leads one to believe that it is only necessary to evaluate school districts once every six years and that it is not necessary to evaluate every individual school in the district. (See discussion in Paragraph 31 of this response.) Currently FEMA Region III is insistent that we have every affected school in each school district evaluated in a six year period. They require all school districts to be evaluated in every biennial exercise. If you have indeed changed this to every school district being evaluated in a six year period that would be very beneficial. It would be better to have one school in the district, if necessary, explain what actions they would take to implement the school district plan, but the OROs should reserve the right to choose which school based upon their availability and the desire to minimize disruption. This should in no way affect the accuracy of the evaluation since all schools within a district follow the same exact plan.	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified. See the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0080a-023	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-10, Item 3.c.2 leads one to believe that it is only necessary to evaluate school districts once every six years and that it is not necessary to evaluate every individual school in the district. (See discussion in Paragraph 31 of this response.) Currently FEMA Region III is insistent that we have every affected school in each school district evaluated in a six year period. They require all school districts to be evaluated in every biennial exercise. If you have indeed changed this to every school district being evaluated in a six year period that would be very beneficial. It would be better to have one school in the district, if necessary, explain what actions they would take to implement the school district plan, but the OROs should reserve the right to choose which school based upon their availability and the desire to minimize disruption. This should in no way affect the accuracy of the evaluation since all schools within a district follow the same exact plan.	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified. See the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0110-040	Alabama Emergency Management Agency, J Frank Price	page III-8, Exhibit III-2 matrix: 3.c.2 note 140 refers to all schools in the system and not to individual schools. Why the system and not just schools in the EPZ?	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified. See the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0100-025	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-10, Item 3.c.2 indicates that the minimum frequency for thedemonstration of protective actions for schools is once every six years. Theassociated footnote (140) further states that this applies to schoolsystems/districts and not individual schools within the district. Pennsylvaniaappreciates this clarification since individual school buildings areaddressed/governed by the school district plan and the decision to implement protective actions for the schools is made by the school district.	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified. See the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-022	Anonymous	I.8 refers to field team monitoring procedures. It should be added to the reference and extent of play for Criterion 4.a.2: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media.	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion I.8 has been added to Demonstration Criterion 4.a.2 and Exhibit III-2.See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0108-038	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-12 Comment: 6.b.1 references footnote 9, which is on page I-3 and appears to reference a regulation.	Modified	The cited footnote was an error and has been deleted. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, , Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0117-026	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, Exhibit III-2, item 4.a.3 – Minimum Frequency. Every full participation exercise (superscript 8)Comments: There is no footnote 8explanation/RecommendatioN: Please correct and add the appropriate footnote.	Accepted	The cited footnote was an error and has been deleted. See Part III.B - REP Exercise Process, Section 1.b Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0117-027	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, Exhibit III-2, item 6.b.1 – Minimum Frequency. Once in six years (superscript 9)Comments: There is no footnote 9explanation/RecommendatioN: Please correct and add the appropriate footnote.	Modified	The cited footnote was an error and has been deleted. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-023	Anonymous	I.8 refers to laboratory capabilities. It should be added to the reference and extent of play for Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0110-041	Alabama Emergency Management Agency, J Frank Price	page III-8, Exhibit III-2 matrix: 5.a.1and 5.b.1 should be acted on when the decision is made.	Noted	Except for situations with an initial declaration of or rapid escalation to Site Area Emergency or General Emergency, demonstration of alert and notification should occur in a timely manner and without undue delay from the time the decision is made to alert and notify the public. Backup alerting should occur within a reasonable time of the ORO becoming aware of the primary system failure, with a suggested goal of 45 minutes.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0108-039	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-12 Comment: 5.a.4 notes a minimum frequency of "Every exercise, as needed." Define "as needed."	Modified	The REP Program Manual has amended the Minimum Evaluation Frequency for Demostration Criterion 5.a.4 to read "At least biennially." See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0110-039	Alabama Emergency Management Agency, J Frank Price	Page III-8, Exhibit III-2 matrix: Using the term timely manner is not defining. All OROs understand this to mean 15 minutes, but a better way to state this would be to say, acted on when received or take immediate actions; an example would be 5.b.1 should be worded; OROs will take immediate actions to notify the public and news media with information and instructions when directed by appropriate authority.	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-010	Anonymous	E.6 refers to notifying and providing prompt instruction to the public. It should be added to the reference and extent of play for Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-011	Anonymous	Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner. G.4.c refers to rumor control – why this and not other parts of G.4?	Modified	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion G.4.a has been added to Demonstration Criterion 5.b.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-118	North Carolina Division of Emergency Management, Stephen Payne	”Page III-12, Criteria 6-Support Operation/Facilities RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a – Monitoring and Decontamination of Evacuees” BASIS:Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b and the registration and care of evacuees to Criterion 6c. This move consolidates all activity associated with emergency workers and their equipment in one criteria and activity associated with evacuee care in another criteria.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-119	North Carolina Division of Emergency Management, Stephen Payne	”Page III-12, Criteria 6-Support Operation/FacilitiesRECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a.1 –The reception center has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, of evacuees.”BASIS:Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment in one criteria and activity associated with evacuee care in another criteria.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-122	North Carolina Division of Emergency Management, Stephen Payne	Page III-12, Criteria 6-Support Operation/Facilities RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“6.c. – Registration and Temporary Care of Evacuees”BASIS:This move consolidates all activity associated with registration and temporary care of evacuees under one criterion.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-123	North Carolina Division of Emergency Management, Stephen Payne	”. Page III-12, Criteria 6-Support Operation/Facilities RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Managers of congregate care facilities demonstrate that the centers have resources to provide services , to include registration, and accommodations consistent with ARC planning guidelines.”BASIS:This move consolidates all activity associated with registration and temporary care of evacuees under one criterion.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-120	North Carolina Division of Emergency Management, Stephen Payne	Page III-12, Criteria 6-Support Operation/FacilitiesRECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“6.b – Monitoring and Decontamination of Emergency Workers and their Equipment” BASIS:Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-121	North Carolina Division of Emergency Management, Stephen Payne	Page III-12, Criteria 6-Support Operation/FacilitiesRECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“6.b.1. – The facility/ORO has adequate procedures and resources for monitoring and decontamination of emergency workers and their equipment, including vehicles”BASIS:Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-012	Anonymous	H.4 refers to facility staffing and set-up, including reception centers. It should be added to the reference and extent of play for Criterion 6.a.1: The reception center/emergency worker facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees and/or emergency workers.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-036	Anonymous	K.5.b refers to the actual decontamination of people. It should be added to the reference and extent of play for Criterion 6.a.1: The reception center/emergency worker facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees and/or emergency workers.	Modified	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. Evaluation Criterion K.5.b refers to decontamination of EWs; demonstration requirements related to EWs are located in Demostration Criterion 6.b.1. Demonstration Criterion 6.a.1 already references Evaluation Criterion K.5.b. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-013	Anonymous	H.4 – refers to staffing and set up of mass care facilities. It should be added to the reference and extent of play for Criterion 1.b.1: Facilities are sufficient to support the emergency response	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-014	Anonymous	H.4 refers to facility staffing and set-up, including reception centers. It should be added to the reference and extent of play for Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of evacuee and emergency worker vehicles and equipment.	Rejected	The Evaluation Area Criteria references and Exhibit III-2 have been reviewed and verified. A number of new references were added and any that were not applicable were removed. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-016	Anonymous	H.10 refers to checking/calibrating equipment, including monitors. The demonstration of this calibration is described in the EOP for 6.d.1, but not for the other monitoring activities (6.b.1). Not clear why the inconsistency.	Noted	Operations checks of monitoring equipment are evaluated under criterion 1.e.1.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-030	Anonymous	J.12 refers to monitoring of equipment. It should be added to the reference and extent of play for Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of evacuee and emergency worker vehicles and equipment.	Modified	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. Evaluation Criterion J.12 refers to monitoring of equipment; demonstration requirements related to evacuess are located in Demostration Criterion 6.a.1. Demonstration Criterion 6.a.1 already references Evaluation Criterion J.12. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-033	Anonymous	K.5.a – refers to monitoring of equipment (K.5.b focuses on decon). It should be added to the reference and extent of play for Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of evacuee and emergency worker vehicles and equipment.	Accepted	Exhibit III-2 has been fully reviewed and updated to reflect numerous comments. A reference to Evaluation Criterion K.5.a has been added to Demonstration Criterion 6.b.1 and Exhibit III-2. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0108-037	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-12 Comment: Footnote 144 indicates that facilities managed by ARC may be "evaluated" once. If all congregate care centers were managed by ARC, would there still be a requirement to demonstrate a CCC yearly, typically with a reception center demonstration? Or is an SAV required for one ARC CCC a year?	Modified	The requirement has been amended for clarity. The footnote now states, "all other facilities not managed by the American Red Cross must be evaluated no less than once every 8 years." The cited situation would be handled on a Regional basis. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, , Exercise Cycle Requirements.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0068-015	Anonymous	H.10 refers to checking/calibrating equipment, including monitors. The demonstration of this calibration is described in the EOP for 6.d.1, but not for the other monitoring activities (6.a.1). Not clear why the inconsistency.	Noted	Operational checks of monitoring equipment are evaluated under criterion 1.e.1.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0088-005	Anonymous	Pages III-8 through III-13: Exhibit III-2, Federal Evaluation Process Matrix. The cross-references in the second column (NUREG-0654) need to be verified and updated. A number of them are inaccurate. In addition, if you rearrange these cross-references by NUREG criterion, it becomes apparent that many planning criteria are not tied to exercise evaluation criteria. Many of these are demonstrable and should be linked to an appropriate exercise evaluation area. Clearly some planning criteria cannot be demonstrated through an exercise, but those that can should be addressed. In some cases, an exercise criterion already addresses the planning criterion (e.g., 3.e.2 should be linked to G.1 and G.2). In other cases, the exercise criterion language might need adjusting to ensure that the planning criterion is addressed. Regardless, each criterion should be tied to some way of validating it, whether through exercise, plan review, annual letter of certification, etc. The objective is not to create additional exercise requirements, but instead to provide additional ways to acknowledge activities OROs are already doing that contribute to reasonable assurance.	Accepted	Exhibit III-2 has been fully reviewed and updated as suggested. Part III.B - REP Exercise Process, Section 1.b Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-117	North Carolina Division of Emergency Management, Stephen Payne	."Page III-12 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Facilities managed by ARC, under the ARC/FEMA MOU, will be evaluated once when designated or when substantial changes occur; all other facilities not managed by ARC must be evaluated once in the exercise cycle."BASIS:Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined.	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.
Exhibit III-2 Process Matrix	FEMA-2008-0022-0113-124	North Carolina Division of Emergency Management, Stephen Payne	."Page III-13, Line 9 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . demonstrated for the initial 44 CFR part 350 qualifying REP exercise . . ."	Rejected	FEMA disagrees with the revision because not all initial qualifying exercises are for 350 approval.
determine evaluation criteria					
determine evaluation criteria	FEMA-2008-0022-0113-126	North Carolina Division of Emergency Management, Stephen Payne	.Page III-14, Line 8-20RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Determining what Evaluation Area criteria are to be demonstrated will depend on the type of exercise. For example, all Evaluation Area criteria must be demonstrated for the initial 44 CFR part 350 qualifying REP exercise when a licensee is seeking an operating license from NRC. All Evaluation Area criteria must be demonstrated by the appropriate ORO in accordance with their plans and procedures. If one or more State or local governments within the EPZ for the site have refused to participate in the planning or preparedness for the site, the licensee offsite plans developed in accordance with Supplement 1, NUREG-0654/FEMA-REP-1 would demonstrate the licensee's capability to implement its plans to protect public health and safety absent participation by State and/or local governments.For a biennial exercise (conducted for continued 44 CFR part 350 approval), planners should review what Evaluation Areas were demonstrated during the previous two exercises to determine those that still need to be demonstrated. This would also include a review of the plans to ensure that all OROs that need to demonstrate an Evaluation Area at least once every exercise cycle have done so."BASIS: Rewording consolidates all information concerning Initial 350 certification exercises to one paragraph and consolidates information on Biennial exercises in a separate paragraph.	Modified	This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance, and the cited paragraph is no longer the same. However, the sentence about required criteria for the qualifying exercise has been moved with the other qualifying exercise information. See Part III.B - REP Exercise Process, Section 2.d - Select Demonstration Criteria to be Evaluated.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
determine evaluation criteria	FEMA-2008-0022-0113-125	North Carolina Division of Emergency Management, Stephen Payne	Page III-13[14], Line 14 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“. . . to demonstrate an Evaluation Area at least once every exercise cycle have done so.” Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined.”	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text.
determine evaluation criteria	FEMA-2008-0022-0042-013	Ned Wright	Page III-14, Line 15: “For the qualifying exercise, all evaluation Area Criterion must be demonstrated…….” “all” needs more clarification. If the site is a “Greenfield” site where the OROs have never conducted a REPP evaluated exercise “ALL” should require a plume and ingestion evaluation to include fully addressing recovery, reentry, and relocation. This will provide reasonable assurance that the offsite response agencies can handle any situation prior to the site coming online. For sites just adding a reactor, the OROs have already demonstrated proficiency and the new reactor should be added to the regular exercise cycle.	Modified	All qualifiying exercises are required to demonstrate both plume and ingestion criteria. Guidance for qualifying exercises pertaining to new reactor licensing is found in the New Reactor SOG. The SOP is referenced in the Part III.B - REP Exercise Process, Section 2.d - Select Demonstration Criteria to be Evaluated. Also, see Standard Operating Guidelines For the New Reactor Combined License Application, available on http://www. fema.gov/about/divisions/thd_repp.shtm.
identify responsible OROs					
identify responsible OROs	FEMA-2008-0022-0113-127	North Carolina Division of Emergency Management, Stephen Payne	.Page III-14, Line 31RECOMMENDATION/COMMENT:REWORD AS FOLLOWS:“The RAC Chair and site specialist will coordinate with the State REP Program manager, State Exercise Officer, State Site Specialist (if assigned) and local ORD’s to determine which criteria should be assigned to a given location at a particular site.BASIS:This coordination MUST take place to ensure proper evaluation of State and local ORO plans and procedures.128. REP PROGRAM MANUAL LANGUAGE/REFERENCE	Accepted	The REP Program Manual has been amended as suggested. Part III.B - REP Exercise Process, Section 2.b Conducting Preplanning Activities, Identify the Responsible OROs for Exercise Demonstration Criteria.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
develop extent of play					
develop extent of play	FEMA-2008-0022-0106-073	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-15, Lines 1-10Comment: As FEMA is now insisting that the HSEEP be used in order for everyone to be NIMS compliant, it should also be using HSEEP terminology of which "Extent of Play" is not.Potential Impact: Not compliant with NIMS as common terminology is not used.	Noted	The extent of play is part of the ExPlan. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
develop extent of play	FEMA-2008-0022-0106-016	Nebraska Emergency Management Agency, Jonathan Schwarz	Potential Impact: Scenario and EOP development needs to become a joint effort between FEMA, the State, local jurisdictions, and the Licensee. The multiple revisions to the EOP document have been very time consuming and have nearly delayed drills of exercises due to delays in timely reviews by FEMA staff. This can be precluded by “making” the FEMA Planner with Station responsibility part of the development team.	Noted	The REP Program Manual has been amended to emphasize coordination between FEMA, OROs, and the licensee in scenario and EOP development.
develop extent of play	FEMA-2008-0022-0088-006	Anonymous	Page III-15, footnote 145: “See Part IV.J, FEMA REP Program Administration: Scenario Reviews.” Part IV.J actually covers Tribal Policies and Procedures. Guidance on scenario reviews does not appear to be included in the manual. There is an existing scenario review checklist guidance document that should be incorporated into the manual.	Modified	Footnote has been amended. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario review guidance has been re-inserted into the REP Program Manual in Part IV.G Conducting Scenario Reviews.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
developing exercise scenarios					
developing exercise scenarios	FEMA-2008-0022-0117-028	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, page III-15, Line 11 - b. Developing REP Exercise ScenariosComments: Item should be “Developing REP Exercise Scenarios” and underlined remove the “b”explanation/RecommendatioN: Cut and paste error	Modified	The cited text has been modified. This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.
developing exercise scenarios	FEMA-2008-0022-0113-128	North Carolina Division of Emergency Management, Stephen Payne	..” Page III-15, Line 12-19 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“REP exercise scenarios are a specialized subset of potential exercise scenarios available under HSEEP. The REP scenarios need to create opportunities for the OROs to demonstrate the Evaluation Areas listed in Exhibit III-2. Exercise scenarios should be varied such that the major elements of the plans and preparedness organizations are tested within an exercise cycle. Exercise scenario variation will also enhance training and provide for a more realistic ORO response, with certain scenarios being used at least once per exercise cycle. This section discusses the selection of a scenario and its elements and other special considerations for REP exercises. Scenario variations may include,but not be limited to, the following:§ Variation of initial classification levels to include initiation at or rapid escalation to a Site Area or General Emergency.§ Successful implementation of mitigative strategies (in plant repairs) that, if properly implemented, mitigate core damage or mitigate/prevent containment failure and release of radiation. (No radiological release or Minimal radiological release that does not require public protective actions).§ Hostile action directed at the plant site.§ In plant repairs that, if properly implemented, mitigate core damage or mitigate/prevent containment failure when the plant is not fully secured from hostile action;§ Implementation of mitigative strategies to respond to the loss of large areas of the plant; § Other elements that vary exercise challenges and avoid participant preconditioning or anticipatory responses.The following scenarios shall occur at least once per exercise cycle:§ Full participation exercise (may be combined with the Ingestion Exposure Pathway Zone exercise)§ Exercise of the Ingestion Exposure Pathway Zone (beyond the 10-mile Plume Exposure Pathway Zone) § Hostile action directed at the plant site;§ An initial classification or rapid escalation to a Site Area or General Emergency	Rejected	Current language is adequate. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
developing exercise scenarios	FEMA-2008-0022-0117-029	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, page III-15, Line 15 - to demonstrate the Evaluation Areas determined in step a.1 aboveComments: There is no a.1 above in this section. Contextually this could reference several prior paragraphsexplanation/RecommendatioN: Please correct the error and remove “a.1” and add a reference to the correct paragraph.	Accepted	The cited text has been modified. The reference has been removed. This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. See Part III.B - REP Exercise Process.
developing exercise scenarios	FEMA-2008-0022-0110-042	Alabama Emergency Management Agency, J Frank Price	page III-15, lines 16-18: Scenarios should only be varied if the scope of the exercise is limited to specific items. Exercises currently require all areas of the plan to be demonstrated, and the need for all ECLs with time in them to complete actions. Varying the Scenario by changing ECLs multiple time are skipping a ECL could cause deficiencies which is major verses HSEEP as an improvement area. On-site it is critical to get the process right where a deficiency is needed, off-site is not as critical and using HSEEP with a improve area will encourage more self evaluations which will, in my opinion do what is intended which is to improve training and exercises	Noted	The comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. REP guidance does not require that all ECLs occur, or that they occur sequentially. ORO plans should have provisions for rapidly escalating incidents or an initial declaration of Site Area Emergency or General Emergency. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
developing exercise scenarios	FEMA-2008-0022-0097-081	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-15 (line 20): COMMENT: Change it to: The licensee, with state input if applicable, develops source term…BASIS: Does not reflect reality for most if not all exercise scenario development. Do any states, other, possibly than Illinois, participate in scenario design source term development?	Modified	The cited sentence has been modified to read, "The licensee and State then develop the scenario and submit it to the appropriate FEMA Regional REP personnel for review…" Specifics of the source term have been deleted. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
developing exercise scenarios	FEMA-2008-0022-0116-091	Nuclear Energy Institute, Alex Marion	Part III.B.2.b pg III-15 (line 20): “The licensee and state develop the source term… and technical elements of the scenario…..” Part III.B.2.b pg III-15 (line 20): Change it to: The licensee, with state input if applicable, develops source term… Basis: Does not reflect reality for most if not all exercise scenario development. Do any states, other, possibly than Illinois, participate in scenario design source term development?	Modified	The cited sentence has been modified to read, "The licensee and State then develop the scenario and submit it to the appropriate FEMA Regional REP personnel for review…" Specifics of the source term have been deleted. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.
developing exercise scenarios	FEMA-2008-0022-0113-129	North Carolina Division of Emergency Management, Stephen Payne	).”Page III-15, Line 20-26 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“A team of Trusted Agents composed of State, local and licensee personnel should develop the technical elements of the scenario and the Master Scenario Event List (MSEL). Part of the scenario development is the choice of the source term (i.e., the amount of radioactive material released to the environment) if a release is to be part of the exercise.”BASIS: As written, this statement implies that ALL exercises will have a release with a source term of a specific level. This is counter to the recommendation for minimal or no-release exercises. It returns predictability to the exercise scenario.	Modified	The cited sentence has been modified to read, "The licensee and State then develop the scenario and submit it to the appropriate FEMA Regional REP personnel for review…" Specifics of the source term have been deleted. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.
developing exercise scenarios	FEMA-2008-0022-0108-155	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-15 Line: 23 Comment: Typo? - "The FEMA RAC chair complete a review" should be "The FEMA RAC chair will complete a review?"	Accepted	The cited sentence has been amended as suggested. See Part III.B - REP Exercise Process, Section 2.c. Conducting Preplanning Activities, Determining Scenario Type and Variables.
developing exercise scenarios	FEMA-2008-0022-0129-039	Wisconsin Emergency Management, Teri Engelhart	Page: III-15, Line: 23 - 24 Comment: Based on this criteria, it suggests that there will be a 15 day turnaround for a complete scenario review. In past practices, scenario reviewers stop reviewing the scenario once the first issue is noted, and reject the scenario without reading the entire submittal. This results in the scenario package being resubmitted multiple times because each subsequent issue is addressed individually, as opposed to a single, complete review. Because of this piece-meal approach to scenario review, final scenario approval is generally not obtained until 3 - 10 days prior to the exercise. Please consider including language that specifies a complete review is to be done within 15 days.	Modified	The REP Program Manual has been amended to indicate a 30-day window for FEMA's scenario review. "The FEMA RAC Chair completes a review of the scenario at least 30 days before the exercise to confirm that it is sufficient to drive the exercise play to demonstrate the agreed-upon exercise Demonstration Criteria and extent of play. " See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
developing exercise scenarios	FEMA-2008-0022-0113-130	North Carolina Division of Emergency Management, Stephen Payne	."Page III-15, Line 37-38 & Page III-15, Line 1-3 RECOMMENDATION/COMMENT: MOVEThis should be the initial subparagraph in section 2. b..	Modified	This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. The cited text has been modified and moved to the beginning of the scenario development section. See Part III.B - REP Exercise Process, Section 2.c - Conducting Pre-Planning Activities, Determine Scenario Type and Variables.
developing exercise scenarios	FEMA-2008-0022-0117-030	California Emergency Management Agency, Elaine Jennings	30 [7.12] REP MANUAL REFERENCE: Part IIIB, page III-16, Line 1 to 3 - The exercise objectives, Evaluation Area criteria, determination of which OROs will demonstrate which criteria, and extent of play should be agreed upon by the exercise planning team prior to initiating development of a scenario. Comments: This item was changed from an agreement between the State and FEMA to the Exercise Planning Team and FEMA. explanation/RecommendatioN: The state is HSEEP compliant and supports the HSEEP integration into the REP program. As an active partner in the exercise planning team, the state will participate in the criteria selection and extent of play agreements. However, this proposal requires further discussion.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. FEMA is supporting integration exercises in every region to assist with the transition process and share lessons learned from previous integrated exercises.
developing exercise scenarios	FEMA-2008-0022-0097-082	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-16 (line 2): COMMENT: Delete this statement. HSEEP practice of determining extent of play first does not comply with REP exercises where the scenario is pre-determined and the extent of play supports the scenario.BASIS: Current rulemaking and proposed guidance for scenario elements does not allow for this. The scenario is predetermined by the exercise cycle.	Rejected	REP scenarios are not pre-determined. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
developing exercise scenarios	FEMA-2008-0022-0116-092	Nuclear Energy Institute, Alex Marion	Part III.B.2.b pg III-16 (line 2): "… and extent of play should be agreed upon by the exercise planning team prior to initiating development of a scenario." Part III.B.2.b pg III-16 (line 2): Delete this statement. HSEEP practice of determining extent of play first does not comply with REP exercises where the scenario is pre-determined and the extent of play supports the scenario. Basis: Current rulemaking and proposed guidance for scenario elements does not allow for this. The scenario is pre-determined by the exercise cycle.	Rejected	REP scenarios are not pre-determined. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. REP exercises are focused on a fixed set of capabilities. At the beginning of the planning process, all participants have the opportunity to have input into the objectives. This includes the extent of play and requirements by FEMA. Specifics within exercises are determined by the planning group and are not shared with the participants. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
developing exercise scenarios	FEMA-2008-0022-0108-156	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-16 Line: 4 Comment: Typo - "guidance is this section" should be "guidance in this section."	Accepted	The cited sentence has been deleted in further revisions of Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
plume exercise play					
plume exercise play	FEMA-2008-0022-0121-104	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -16 Line: 12-27 Comments: The key to understanding this section is the Preferred approach when it states this is the "integrated approach" (Line 18). Otherwise the rest of it makes little sense and is confusing. Whenever you have special controller injects for field play that is limited to a few players, then they are not integrated into the overall exercise starting at the injection point. It automatically becomes an out-of-sequence drill. The scenario effectively changes for them. The alternate approach as described is by definition not integrated and therefore out of sequence with the overall exercise. It is a drill (using a different scenario) within an exercise and if the players in that drill try to coordinate with the EOCs or other players in the overall exercise, the result will be only confusion and certain criteria may not be met.	Modified	This section of the REP Program Manual has been rewritten for clarity. The idea of preferred and alternate approaches has been incorporated into other portions of the Part III - Demonstration Guidance. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Types.
plume exercise play	FEMA-2008-0022-0113-131	North Carolina Division of Emergency Management, Stephen Payne	."Page III-16, Line 13-15 RECOMMENDATION/COMMENT: DELETEThis is redundant; following subparagraphs provide the same information with greater detail.	Modified	The cited sentences were intended to provide introduction to the specific items below. This overall discussion has been revised for further clarification. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Types.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
plume exercise play	FEMA-2008-0022-0080a-024	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-16 starting on Line 22 describes an alternate plume exposure pathway approach that it appears will use controller injects to force OROs to make protective action decisions (PADS) based on projected or actual contamination levels while plant personnel are working off of a scenario that is based on plant conditions and not releases. Perhaps your description of this approach is misunderstood, but that would indicate that a state will be expected to operate during the exercise while monitoring the actual plant data that plant personnel are using and at given times receive controller injects that are in complete disagreement with what they are seeing from the plant data. It would then be necessary for a state to react and make decisions based on two separate sources of differing data during the same exercise. This simply cannot have a good outcome for players. Recommend this section be further clarified.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
plume exercise play	FEMA-2008-0022-0080-025	Douglas Fleck	Page III-16 starting on Line 22 describes an alternate plume exposure pathway approach that it appears will use controller injects to force OROs to make protective action decisions (PADS) based on projected or actual contamination levels while plant personnel are working off of a scenario that is based on plant conditions and not releases. Perhaps your description of this approach is misunderstood, but that would indicate that a state will be expected to operate during the exercise while monitoring the actual plant data that plant personnel are using and at given times receive controller injects that are in complete disagreement with what they are seeing from the plant data. It would then be necessary for a state to react and make decisions based on two separate sources of differing data during the same exercise. This simply cannot have a good outcome for players. Recommend this section be further clarified.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
plume exercise play	FEMA-2008-0022-0113-133	North Carolina Division of Emergency Management, Stephen Payne	."Page III-16, Line 38-39 & Page II-16, Line 1-4RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Scenarios should be designed to sustain the potential for radiological release with projected doses such that OROs will need to implement applicable protective actions. Such scenarios should be scripted to preclude OROs from being able to wait out the scenario to avoid making decisions on implementing protective actions. Failure of responsible OROs to take appropriate and timely protective actions may result in FEMA citing a Deficiency, even in the absence of a simulated release during the exercise.	Modified	The commenter's suggestion relates to the "alternate plume exposure pathway approach" and when it can be used. This information has been incorporated into the discussion of no/minimal-release scenarios. See Part III.B - REP Exercise Process, Section 2.c.2.b - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Variables, No radiological release or an unplanned minimal radiological release that does not require the declaration of a General Emergency.
plume exercise play	FEMA-2008-0022-0108-157	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-16 Line: 22-34 Comment: Is the "alternate plume exposure pathway approach" how FEMA intends to allow OROs to demonstrate criterion when there is no release (for example)?	Noted	Yes. The commenter's suggestion relates to the "alternate plume exposure pathway approach" and when it can be used. This information has been incorporated into the discussion of no/minimal-release scenarios. See Part III.B - REP Exercise Process, Section 2.c.2.b - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Variables, No radiological release or an unplanned minimal radiological release that does not require the declaration of a General Emergency.
plume exercise play	FEMA-2008-0022-0113-132	North Carolina Division of Emergency Management, Stephen Payne	.Page III-16, Line 22RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"In the alternative approach, plant conditions alone, with no potential or simulated release of radioactive materials into the environment, may be used to drive exercise play for all initial protective action decision-making and implementation."	Modified	The commenter's suggestion relates to the "alternate plume exposure pathway approach" and when it can be used. This information has been incorporated into the discussion of no/minimal-release scenarios. See Part III.B - REP Exercise Process, Section 2.c.2.b - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Variables, No radiological release or an unplanned minimal radiological release that does not require the declaration of a General Emergency.
plume exercise play	FEMA-2008-0022-0102-045	Entergy Nuclear Operations, Inc., Michael Slobodien	Page III-16, Lines 22-25, and Page III-16, lines 35-37 go on to state: "Certain conditions should be met for FEMA to approve such an approach: "(First bullet) The involved OROs cannot have a Deficiency related to protective action decisionmaking in the last exercise".Comments: The reasoning provided in the first bulleted condition involving a previous Deficiency is not clear because any Deficiency will need to be investigated, resolved and closed. Such a limitation should not carry over to a subsequent exercise if the Deficiency has been previouslydemonstrated to be corrected. It is recommended that the first bulleted sentence be deleted and not carried over to the next exercise evaluation period.	Rejected	This comment is inconsistent with FEMA policy. OROs must have demonstrated the ability to meet evaluation criteria through the standard integrated approach before doing it through injects.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
plume exercise play	FEMA-2008-0022-0110-044	Alabama Emergency Management Agency, J Frank Price	page III-16, lines 32-37: Using an alternative approach should not require that a deficiency, that would have been corrected, be excluded.	Noted	This comment is inconsistent with FEMA policy. OROs must have demonstrated the ability to meet evaluation criteria through the standard integrated approach before doing it through injects.
plume exercise play	FEMA-2008-0022-0097-083	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-16 (line 36-37):COMMENT: Remove the entire first bullet.BASIS: If a prior Deficiency has been adequately closed out and documented as such, then the original issue no longer exists. If the closeout is good enough for preparedness for an actual response than its good enough for the next exercise evaluation.	Rejected	This comment is inconsistent with FEMA policy. OROs must have demonstrated the ability to meet evaluation criteria through the standard integrated approach before doing it through injects.
plume exercise play	FEMA-2008-0022-0116-093	Nuclear Energy Institute, Alex Marion	Part III.B.2.b pg III-16 (line 36-37): First Bullet: "The involved OROs cannot have a deficiency related to protective action decision-making in the last exercise." Part III.B.2.b pg III-16 (line 36-37): First Bullet: Remove the entire first bullet. Basis: If a prior Deficiency has been adequately closed out and documented as such, then the original issue no longer exists. If the closeout is good enough for preparedness for an actual response than its good enough for the next exercise evaluation.	Rejected	This comment is inconsistent with FEMA policy. OROs must have demonstrated the ability to meet evaluation criteria through the standard integrated approach before doing it through injects.
plume exercise play	FEMA-2008-0022-0109-041	Ottawa County, Ohio, Koch Beth	page III-16 line 36-37: "The involved OROs cannot have a deficiency related to protective action decision-making in the last exercise."COMMENT: A deficiency dealing with protective action decision-making would have to have been adequately re-demonstrated within 120 days after the exercise in which it was issued. Remove the first bullet.	Rejected	This comment is inconsistent with FEMA policy. OROs must have demonstrated the ability to meet evaluation criteria through the standard integrated approach before doing it through injects.
ingestion exercise play					
ingestion exercise play	FEMA-2008-0022-0105-020	Tennessee Emergency Management Agency, Gary Lima	[Page III-17, line 16; III-55, line 37] EPA 400 and FRMAC no longer recognize the 50 year PAG.	Noted	The new EPA 400 is still in draft form. The REP Program Manual will be amended as appropriate once the EPA 400 revision is finalized.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations					
scenario considerations	FEMA-2008-0022-0113-134a	North Carolina Division of Emergency Management, Stephen Payne	Page III-17, Line 22RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:1. Frequency of Ingestion Pathway Exercises. A State should fully participate in the ingestion pathway portion of exercises at least once every exercise cycle. States that have more than one site should rotate this participation from site to site – no partial participation is required. During the year in which the full-participation ingestion exercise is held at one of the sites, the State and local governments should review their plans/procedures for all other sites within that State to verify their accuracy and completeness. The ingestion pathway portion of an exercise should include local plans/procedures and preparedness as well as State response. This review and any resulting revisions should be made and reported in the ALC as part of the State's annual review and plans/procedures update.2. If a State is within the 50-mile ingestion exposure pathway of a site in a bordering State, andthe State does not have a NPP located within its own borders, the State should fully participate in at least one ingestion pathway exercise every exercise cycle at the bordering State's site(s). If the State does have a site located ,	Modified	The REP Program Manual language in Part III.B - REP Exercise Process has been revised to consolidate the description of Ingestion Exposure Pathway Exercises with text on the required frequency. See Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types and Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
scenario considerations	FEMA-2008-0022-0113-134b	North Carolina Division of Emergency Management, Stephen Payne	(continued)within its borders, the State should partially participate in all ingestion pathway exercises with the bordering State's site(s). 3. Ingestion Pathway Exercise Participants. The definition of full participation in ingestion pathway aspects of exercises is guided by 44 CFR § 350.2(j). Although State and tribal officials have primary responsibility for the ingestion portion of exercises, local governments may have support and protective action responsibilities that would require their participation in such exercises. A sufficient number and functions of personnel should be provided for carrying out ingestion measures required for a particular incident scenario. Also organizations fully participating in the ingestion pathway portion of an exercise should deploy FMTs, two or more, to secure and analyze media samples as required by the incident scenario. 4. As noted above, State officials would be primarily involved in the ingestion pathway portion of exercises. A sufficient number and function of State personnel will be needed to verify capabilities for the following responsibilities: direction and control,		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0113-134c	North Carolina Division of Emergency Management, Stephen Payne	(continued) communications, accident/incident assessment, protective action decision-making, and dissemination of emergency information to the general public and/or organizations involved with ingestion measures.5. Partial Participation in Ingestion Pathway Exercises. The definition of partial participation in ingestion pathway aspects of exercises is guided by 44 CFR § 350.2(k). State emergency personnel would be primarily involved in the ingestion portion of the exercise. A sufficient number and function of State personnel will be needed to verify capabilities for the following responsibilities: direction and control and related communications for protective action decision-making, and dissemination of emergency information to appropriate individuals, groups, and the general public. Organizations partially participating in the ingestion portion of an exercise will not have to deploy field teams to secure and analyze media samples.”		
scenario considerations	FEMA-2008-0022-0110-045	Alabama Emergency Management Agency, J Frank Price	page III-17, lines 22-30 and III-18, lines 6-38: I agree that exercises are expected, which means OROs are properly trained to respond as planned, varying the exercises should help eliminate some pre-conditioning, but if all criterion areas must be demonstrated the scenarios must have sufficient time at each EAL to complete, items in the plans, operating procedures and guides. With the intent of the exercise as demonstrating the plans/procedures/guides as required by NUREG-0654 planning standards the EALs are used to perform actions; how will going from an SAE, where schools are being relocated with messages to parents, to Alert where schools are not evacuated be evaluated? State plans do not have reversing mechanism in them, so confusion could be caused in the players trying to follow the plan and not what common sense would do. This requirement should not be required. Starting at GE is considered a fast-breaker which would leave the State unable to demonstrate many items.	Noted	The comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. REP guidance does not require that all ECLs occur, or that they occur sequentially. ORO plans should have provisions for rapidly escalating incidents or an initial declaration of Site Area Emergency or General Emergency.
scenario considerations	FEMA-2008-0022-0113-135	North Carolina Division of Emergency Management, Stephen Payne	.”Page III-17, Line 22-30RECOMMENDATION/COMMENT: DELETE BASIS:As written, this paragraph is more broad based and is not specific to IPZ exercise activity.	Modified	The cited text has been modified. This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0113-136a	North Carolina Division of Emergency Management, Stephen Payne	Page III-17, Line 22RECOMMENDATION/COMMENT: INSERT FOLLOWING:"REP exercise scenarios need to be enhanced to help avoid anticipatory responses by exercise participants due to preconditioning and to emphasize the expected interfaces and coordination between key decision-makers based on realistic postulated events. REP exercise scenarios have traditionally been designed to reliably deliver the expected demonstrations of capabilities in a manner that facilitates performance and evaluation. This situation has resulted in a pattern of predictable biennial exercises that may precondition responders toward certain expectations about how the exercise event will unfold and negative training associated with conducting exercises the same way, using familiar scenarios that proceed at the same pace.. Some of the predictable features of biennial exercise scenarios include:§ There will always be a large radiological release, resulting in the need for public dose-based protective actions beyond 5 miles;§ The initial plant conditions for the exercise will often suggest the scenario outcome;	Modified	The REP Program Manual language in Part III.B - REP Exercise Process has been revised to consolidate the description of Ingestion Exposure Pathway Exercises with text on the required frequency. See Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types and Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
scenario considerations	FEMA-2008-0022-0113-136b	North Carolina Division of Emergency Management, Stephen Payne	(continued)§ The licensee will not be allowed to mitigate the accident before a release occurs;§ The release will occur after a General Emergency is declared;§ Initial protective action recommendations will be developed based on plant conditions rather than on an assessment of radiological conditions;§ The release will be directed toward the major population centers, without regard for existing meteorological conditions and terminated before the exercise ends;§ The exercise will escalate in a sequential manner through the emergency classes; and§ There will be enough time between emergency classes to facilitate the evaluation of required demonstrations.Further, typical scenarios in biennial exercises use simulated accidents such as loss of coolant and steam generator tube rupture accidents, which do not resemble credible accidents. Therefore, FEMA and the NRC have recognized the need to enhance REP exercise scenario realism and add new scenario variables, including varied release conditions, non-sequential escalation of emergency classification levels, and incorporating HAB events.'	Modified	The REP Program Manual language in Part III.B - REP Exercise Process has been revised to consolidate the description of Ingestion Exposure Pathway Exercises with text on the required frequency. See Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types and Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0117-031	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, page III-17, Line 22 to 30 - REP exercise scenarios traditionally have been designed to reliably deliver the expected demonstrations of capabilities in a manner that facilitates performance and evaluation. This situation has resulted in predictable biennial exercise scenarios that may precondition responders toward certain expectations about the how the exercise event will unfold and negative training associated with conducting exercises the same way, using familiar scenarios that proceed at the same pace. Further, typical scenarios in biennial exercises use simulated accidents such as loss of coolant and steam generator tube rupture accidents, which do not resemble credible accidents. Therefore, FEMA and the NRC have recognized the need to enhance REP exercise scenario realism and add new scenario variables, including varied release conditions, non sequential escalation of emergency classification levels, and incorporating HAB events.Comments: This paragraph is not applicable when discussing the Ingestion exposure pathway exercise play. It is more applicable and similar to changes incorporated regarding the scenario variations explanation/RecommendatioN: Remove this paragraph and if necessary, place it in a section where it would be applicable.	Modified	The cited text has been modified. This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types.
scenario considerations	FEMA-2008-0022-0100-026	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-17, Lines 22-30 are a part of the Ingestion Exposure Pathway Exercise Play; however, line 24 states that scenarios for nuclear power plant exercises have become predictable and serve to precondition on-site responders. We believe that this statement has been placed within the incorrect section.	Modified	The cited text has been modified. This section of the REP Program Manual has been rewritten to incorporate additional HSEEP guidance. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Types.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0080-026	Douglas Fleck	Page III-17, Line 24 states that scenarios for nuclear power plant exercises have become predictable and serve to precondition on-site responders. This is likely true, but begs the question as to why it took 30-years to come to this realization. It also raises the question as to what will prevent a few new variations from becoming predictable in a short time. It is worth mentioning that Offsite Response Organizations (ORO) find the scenarios and exercises just as predictable as everyone else, but we have no way of meeting the rigid FEMA evaluation criteria without using these predictable and unrealistic scenarios. Without a significant release OROs simply will not reach the point where many of the offsite decisions and responses will be required. For exercises, the agreed upon scenario that meets the bases of these new Emergency Preparedness changes (avoiding pre-conditioning, realistic scenarios, and no negative training) should determine the evaluation criteria used. In other words the evaluation goals, parameters, and criteria should be flexibly determined once the scenario has been agreed to by all parties and we should cease this concept that all criteria listed for a biennial exercise must be evaluated regardless of it being realistically tied to the scenario. Unless FEMA is willing to waive the evaluation of these numerous “must evaluate” biennial criteria it may be more advantageous to continue the current method for the graded biennial exercises and use the new scenarios for more plant oriented exercises that do not involve such a huge level of offsite participation and evaluation.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0080a-025	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-17, Line 24 states that scenarios for nuclear power plant exercises have become predictable and serve to precondition on-site responders. This is likely true, but begs the question as to why it took 30-years to come to this realization. It also raises the question as to what will prevent a few new variations from becoming predictable in a short time. It is worth mentioning that Offsite Response Organizations (ORO) find the scenarios and exercises just as predictable as everyone else, but we have no way of meeting the rigid FEMA evaluation criteria without using these predictable and unrealistic scenarios. Without a significant release OROs simply will not reach the point where many of the offsite decisions and responses will be required. For exercises, the agreed upon scenario that meets the bases of these new Emergency Preparedness changes (avoiding pre-conditioning, realistic scenarios, and no negative training) should determine the evaluation criteria used. In other words the evaluation goals, parameters, and criteria should be flexibly determined once the scenario has been agreed to by all parties and we should cease this concept that all criteria listed for a biennial exercise must be evaluated regardless of it being realistically tied to the scenario. Unless FEMA is willing to waive the evaluation of these numerous “must evaluate” biennial criteria it may be more advantageous to continue the current method for the graded biennial exercises and use the new scenarios for more plant oriented exercises that do not involve such a huge level of offsite participation and evaluation.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.
scenario considerations	FEMA-2008-0022-0119-005	Progress Energy, Kenneth Heffner	The level of prescriptive detail for the scenario content in the proposed REP Manual is not necessary and, in may ways does not adequately address the “predictability” of the scenarios. With knowledge of the previous two scenarios, ORO and site EROs could then begin to predict a rapid escalation scenario to a higher classification, a hostile action scenario, etc.). Licensees and OROs are capable of addressing variations of scenarios by using guidance versus rulemaking.The Rulemaking should consider realigning the evaluated exercise cycle to biennial versus biennial. The maturity of the programs as well as the construction of new plants, will unnecessarily tax the OROs requiring them to participate in many more exercises than necessary. This is an opportunity to better manage evaluation resources for the industry for the decades going forward.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0113-137	North Carolina Division of Emergency Management, Stephen Payne	Page III-18, Line 1RECOMMENDATION/COMMENT: ADD THE FOLLOWING:"All the major elements of these Evaluation Areas are to be tested through exercises at least once in every exercise cycle on a site-specific basis. The site-specific exercise cycle begins with the date of the first joint (licensee and State, local, and tribal governments) exercise conducted after November 3, 1980 (the effective date of the NRC Final Regulations on Emergency Planning, 10 CFR § 50 [Appendix E]) (45 FR 55410, August 19, 1980), and issuance of NUREG-0654, FEMA-REP-1, Revision 1, November 1980. "	Modified	Elements of the suggestion modification have been incorporated into the section on exercise cycle requirements. See Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements for information on requirements for the exercise ts and demonstration of Evaluation Areas.
scenario considerations	FEMA-2008-0022-0130-022	State of Vermont, Barbara Farr	Supplemental 4 has not yet been approved and many parts of this document have been written into the Draft REP Program Manual as though it were approved. We suggest that, in addition to the following issues and comments, all references to supplemental 4 be removed from the DRAFT REP Program Manual until such time as this document is approved.	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.
scenario considerations	FEMA-2008-0022-0113-139	North Carolina Division of Emergency Management, Stephen Payne	:" Page III-18, Line 2 RECOMMENDATION/COMMENT: DELETE & INSERT AS FOLLOWS:"FEMA and the NRC currently allow exercise planners to vary the cause and magnitude of the radioactive release so long as they meet two key criteria:a. Plume-phase scenarios must result in actual or potential conditions that trigger protective action decisions for the public at varying distances in the EPZ (e.g., evacuation, shelter-in-place, and use of KI).b. At least one exercise in every exercise cycle must include a post-plume phase ingestion pathway and relocation/re-entry/return exercise.BASIS: Under NRC regulations, periodic exercises must demonstrate response to a wide spectrum of accidents including, but not limited to, those with and without core damage, with and without a radiological release, and hostile action against the site and those that allow realistic simulated actions to mitigate consequences of the event.The following changes to the exercise scenario and evaluation criteria are intended to reduce exercise predictability and any associated negative training practices. "	Modified	The REP Program Manual language and guidance has been amended to ensure that exercises are designed to provide opportunity to demonstrate offsite protective actions. See Part III.B - REP Exercise Process, Section 1.a.1 - Scheduling REP Activities, Activity Types, Exercises.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
scenario considerations	FEMA-2008-0022-0113-138	North Carolina Division of Emergency Management, Stephen Payne	" Page III-18, Line 2 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . within an exercise cycle . . ." BASIS: Rewording deletes the time period requirement and allows statement to meet the requirements of the exercise guidance once the exercise time period has been determined.	Modified	The commenter's suggestion is inconsistent with FEMA policy and best practices. It is important to specify the length of the exercise cycle in the REP Program Manual text. The REP Program Manual language has been amended to read "All the elements of the NUREG-0654/FEMA-REP-1 Planning Standards, as expressed functionally through the Evaluation Areas, Sub-elements, and Demonstration Criteria, are evaluated no less than once in an 8-year exercise cycle." Section Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
A. Rapidly Developing Incident					
A. Rapidly Developing Incident	FEMA-2008-0022-0113-140	North Carolina Division of Emergency Management, Stephen Payne	Page III-18, Line 6 RECOMMENDATION/COMMENT: DELETE & INSERT AS FOLLOWS:a. To avoid Predictability of Emergency Classification Levels (ECLs), exercises may begin at any of the four Emergency Classification Levels (ECLs), skip an ECL, or have a rapid escalation of ECLs to reflect a rapidly developing event. BASIS: There are four ECLs that provide a basis for determining the level of response actions to a potential or actual emergency at an NPP. The ECLs are: Notice of Unusual Event (NOUE), Alert, Site Area Emergency (SAE), and General Emergency GE. The current approach to exercise design routinely begins with declaration of NOUE or Alert with progress gradually through each level, culminating at GE with appropriate time periods designated between classifications to allow for the systematic demonstration of response activities. Because players are preconditioned to expect this sequential and gradual escalation in emergency classification level over a compressed time period, they may anticipate and make decisions based on the exercise scenario and elapsed scenario time, rather than focusing on the unfolding scenario emergency conditions. In a real event, the problem may be contained early in the response such that a General Emergency is never reached, and therefore may not have required an evacuation. In other cases, NPP conditions may rapidly deteriorate, resulting in an initial declaration of a Site Area Emergency, or skipping an emergency classification level altogether."	Rejected	The existing REP Program Manual language is adequate. Each of the variations discussed in this section helps to avoid predictibility, not just the item cited by the commenter.
A. Rapidly Developing Incident	FEMA-2008-0022-0129-041	Wisconsin Emergency Management, Teri Engelhart	Page: III-18, Line: 6 - 7 Comment: An exercise can start at any Emergency Classification Level If an exercise can start at a General Emergency, would their be additional exercise criteria to be demonstrated? Would 5.a.2 be completed for a "fast-breaker"?	Noted	No additional demonstration criteria will be introduced for demonstration. Demonstration Criterion 5.a.2 remains as 'reserved'; primary alert and notification of the public during a rapidly escalating scenario will continue to evaluated under criterion 5.a.1.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
A. Rapidly Developing Incident	FEMA-2008-0022-0113-141	North Carolina Division of Emergency Management, Stephen Payne	” Page III-18, Line 9-15RECOMMENDATION/COMMENT: DELETE BASIS: Information provided here has been consolidated into previous paragraph.(See Item Above)	Accepted	The introduction to Part III has been amended to reflect changes throughout the rest of Part III. The cited sentence has been deleted. See Part III.B - REP Exercise Process.
A. Rapidly Developing Incident	FEMA-2008-0022-0116-094	Nuclear Energy Institute, Alex Marion	Part III.B.2.b.a pg III-18 (lines 14- 16): “This scenario does not reflect actual event classifications where licensees…. NOUE through higher ECLs.” Part III.B.2.b.a pg III-18 (lines 14- 16): Change to: “This scenario does not reflect actual event classifications where licensees…. NOUE through higher ECLs or have made an initial classification, such as an Alert, and remained there for a number of hours and then terminated.”Basis: What’s being referred to are scenarios which sequentially step through the ECLs. One important ACTUAL scenario timeline that Should be included to educate OROs in the next 20 or so year cycle is a single ECL that holds throughout the duration of the event. If reality is being referred to, then add some.	Modified	The commenter's suggestion of a single ECL that holds throughout the entire exercise is cetainly one possible scenario. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Variables.
A. Rapidly Developing Incident	FEMA-2008-0022-0097-084	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-18 (lines 14-16):COMMENT: Change to: “This scenario doesnot reflect actual event classifications where licensees….NOUE through higher ECLs orhave made an initialclassification, such as an Alert,and remained there for a numberof hours and then terminated.”BASIS: What’s being referred to are scenarios which sequentially step through the ECLs. One important ACTUAL scenario timeline that Should be included to educate OROs in the next 20 or so year cycle is a single ECL that holds throughout the duration of the event. If reality is being referred to, then add some.	Modified	The commenter's suggestion of a single ECL that holds throughout the entire exercise is cetainly one possible scenario. See Part III.B - REP Exercise Process, Section 2.c.1 - Conducting Pre-Planning Activities, Determine Scenario Type and Variables. Scenario Variables.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
A. Rapidly Developing Incident	FEMA-2008-0022-0110-046	Alabama Emergency Management Agency, J Frank Price	page III-18, lines14-21: I do understand what is intended here for exercise development. I think attempting to use HSEEP (see what problems occur) verses current REP criteria (don't let anything go wrong) and developing a realistic scenario could be problematic.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
A. Rapidly Developing Incident	FEMA-2008-0022-0108-158	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-18 Line: 14-21 Comment: ECL escalation does not "reflect actual event classifications" in an exercise. With the latest EALs, would the "actual events" referenced have been classified in the same manner? A footnote would be appreciated to note the "actual events" noted.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
A. Rapidly Developing Incident	FEMA-2008-0022-0077-003	PA DEP Bureau of Radiation Protection, David Allard	Page 111-18 This section proposes scheduling a scenario involving no radiological release or an unplanned minimal radiological release that does not require offsite public protective actions in one biennial exercise per (6 year) exercise cycle. PA BRP does not support this proposal because: a. Behind it is a fundamental misunderstanding of Protective Action Decision making in the Emergency Phase. Protective Actions during the Emergency Phase of a nuclear power plant exercise or event are normally taken based on plant conditions, not on actual releases. Protective actions may be ordered (and often are) based on plant conditions, in the absence of any radiological release. b. REP Exercises are designed to test the response of State and Local organizations to a General Emergency and radiological release from a nuclear power plant. The demonstration criteria presuppose a radiation release, and the implementation of protective actions for the public. Demonstration of response elements may not take place if no protective actions are taken. Will this be handled by simply not evaluating all response elements, or will 'out-of-sequence' demonstrations need to be scheduled to cover items not demonstrated in the exercise play? The risk here is that we will move from having an integrated exercise, which while predictable, evaluates all program elements, to a disconnected set of demonstrations, that do not flow together in a coherent exercise. PA BRP believes that the agreed on exercise scenario, developed in accordance with the emergency preparedness program changes (with the goals of avoiding preconditioning and negative training), should determine the actual evaluation criteria to be used for exercises for offsite response organizations.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
A. Rapidly Developing Incident	FEMA-2008-0022-0113-142	North Carolina Division of Emergency Management, Stephen Payne	." Page III-18, Line 18 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . frequency of at least once every exercise cycle (not less than once every 8 years). . ."	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
A. Rapidly Developing Incident	FEMA-2008-0022-0113-143	North Carolina Division of Emergency Management, Stephen Payne	Page III-18, Line 20RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"This is intended to establish a minimum demonstration frequency only."	Rejected	FEMA disagrees that adding the suggested text improves the discussion. REP Program Manual language has been modified elsewhere in the Part III Introduction to better clarify minimum demonstration frequencies.
A. Rapidly Developing Incident	FEMA-2008-0022-0113-144	North Carolina Division of Emergency Management, Stephen Payne	."Page III-18, Line 22-24 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"Regardless of the starting ECL, it is not necessary to reach the GE classification in order to drive the offsite response, provided that OROs adequately demonstrate all appropriate biennial criteria."	Accepted	The REP Program Manual has been amended as suggested. Part III.B - REP Exercise Process, Section 2.c.2.a Conducting Preplanning Activities, Determining Scenario Type and Variables, Scenario Variables, An initial classification of or rapid escalation to a Site Area Emergency or General Emergency.
A. Rapidly Developing Incident	FEMA-2008-0022-0108-159	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-18 Line: 23-24 Comment: A GE is not required during an exercise, "provided that OROs adequately demonstrate all appropriate biennial criteria." Is this related to the "alternate plume exposure pathway approach," in which injects would be required to successfully demonstrate KI decisions/implementation, field team management, dose assessment, etc?	Modified	Yes. The commenter's suggestion relates to the "alternate plume exposure pathway approach" and when it can be used. This information has been incorporated into the discussion of no/minimal-release scenarios. See Part III.B - REP Exercise Process, Section 2.c.2.b - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Variables, No radiological release or an unplanned minimal radiological release that does not require the declaration of a General Emergency.
A. Rapidly Developing Incident	FEMA-2008-0022-0129-040	Wisconsin Emergency Management, Teri Engelhart	Page: III-18, Line: 23 - 24 Comment: As stated here and in several other places throughout the manual, "reaching a General Emergency is not required." Many of the biennial requirements are dependant upon a release (i.e. dose assessment, PARs, field monitoring, etc.). It is unclear as to how all biennial requirements could be met in a non-release scenario. Please provide direction as to how this can be accomplished.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
A. Rapidly Developing Incident	FEMA-2008-0022-0113-145	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-18, Line 25RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“. . .practice exercises should not use . . .”	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. The term "dress rehearsal" refers specifically to the preparatory exercise for the evaluated exercise and is the same term used by NRC.
A. Rapidly Developing Incident	FEMA-2008-0022-0078-095	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-18 Lines 25-28 Clarify whether this is required or recommended	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods.
A. Rapidly Developing Incident	FEMA-2008-0022-0078-096	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-18 Lines 25-28 Why are “dress rehearsals” being regulated? State and local jurisdictions should be able to conduct non evaluated exercises in any manor they chose to use.	Noted	RAC chair determines eligible for on-the-spot correction. Dress rehearsals are an opportunity for OROs to practice and prepare, and receive informal feedback if desired to help them improve their performance. If the same scenario is used for both the dress rehearsal and the exercise, it reduces the value of the exercise as a learning tool. In addition, using the same scenario for the dress rehearsal compromises the integrity of the exercise scenario.
A. Rapidly Developing Incident	FEMA-2008-0022-0113-146	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-18, Line 27RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“. . .practice exercises . . .”	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices. The term "dress rehearsal" refers specifically to the preparatory exercise for the evaluated exercise and is the same term used by NRC.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
B. Release Options					
B. Release Options	FEMA-2008-0022-0078-098	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-18 Lines 30-38 If we have a requirement to conduct a "no release" scenario why would we be required to do that in a regulatory document intended to demonstrate preparedness for a release of radioactive materials?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
B. Release Options	FEMA-2008-0022-0078-099	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-18 Lines 30-38 How do we demonstrate "a full range of protective actions for all jurisdictions within the Plume Exposure Pathway EPZ" when there is "no release or… no requirement for offsite public protective actions"	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
B. Release Options	FEMA-2008-0022-0108-160	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-18 Line: 32-35 Comment: How do you demonstrate criteria when you do not have the necessity? Injects? Interviews? If one biennial exercise within the 6-year cycle is required to have no or a minimal release, after two exercises have passed with a release, it will be very predictable that the next one won't have one.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
B. Release Options	FEMA-2008-0022-0113-148	North Carolina Division of Emergency Management, Stephen Payne	Page III-18 Line 35 RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"Scenarios should not include a "no release option" for consecutive exercises at a particular site. "	Modified	The REP Program Manual has been modified to add the sentence, "A "no/minimal release" scenario must not be used in consecutive exercises. " See Part III.B - REP Exercise Process, Section 2.c.2.b - Conducting Pre-Planning Activities, Determine Scenario Type and Variables, Scenario Variables, No radiological release or an unplanned minimal radiological release that does not require the declaration of a General Emergency.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
B. Release Options	FEMA-2008-0022-0113-147	North Carolina Division of Emergency Management, Stephen Payne	Page III-18, Line 35-36RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"The scenario for a simulated NPP incident is developed jointly by participating State, tribal, and local government representatives and the licensee and submitted to the FEMA Regional Office for review. The scenario includes meteorological and radiological data such as characteristics of the release, projected dose, exposure rates, and concentration in the environment. The radiological data should be supported by and compatible with plant conditions and the associated potential for releases or simulated releases. Because of the potential for exercise scenarios to be essentially repeated at many sites without significant variation in magnitude of release, decision-makers could face essentially the same set of conditions leading to either: (1) mechanical decisions based on the previous exercises, rather than thoughtful risk analysis; or (2) some decisions that are not being tested."	Rejected	This idea is already explained elsewhere in the Part III Introduction.
B. Release Options	FEMA-2008-0022-0108-161	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-18 Line: 36-38 Comment: If all parties do not agree on the use of the "no release" option during a 6-year cycle, how will FEMA address the issue (i.e., deficiency, ARCA, planning issue, other)?	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
B. Release Options	FEMA-2008-0022-0078-101	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-19 There has been no set of planning requirements, demonstration criteria or expectations of what is required put forth by FEMA for these events to date. A set of planning requirements and exercise standards that State and local jurisdictions will be evaluated against needs to be developed before a successful HAB exercise can be conducted.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
C. Varying Release Conditions					
C. Varying Release Conditions	FEMA-2008-0022-0113-149	North Carolina Division of Emergency Management, Stephen Payne	Page III-19, Line 2RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"In addition to the above changes, exercise scenarios shall include varied release effects and environmental and meteorological conditions between exercise scenarios within a cycle (e.g., momentary or puff vs. continuous release, ground vs. elevated release, shifting wind direction and speed), as applicable to plant design and historical site characteristics. These elements are not to be considered requirements, but rather areas for consideration as part of scenario development discussions."	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
C. Varying Release Conditions	FEMA-2008-0022-0078-100	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-19 Lines 1-7 Requiring shifting wind direction and speed could result in an exercise with 3 PARs This is not a practical requirement when only one PAR is actually required for demonstration	Noted	This is a reflection of guidance related to more realistic exercises - in real life, multiple PARs could be needed. It allows for more flexibility in scenario development.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
D. More Realistic Conditions					
D. More Realistic Conditions	FEMA-2008-0022-0113-150a	North Carolina Division of Emergency Management, Stephen Payne	).Page III-19, Line 8-33RECOMMENDATION/COMMENT: DELETE & INSERT AS FOLLOWS:d. A broader spectrum of initiating events should be used to create more realistic and challenging exercises.Current guidelines do not specify initiating events for radiological emergency preparedness exercises, but initiating events have traditionally been based upon a series of equipment failures and accidents at the NPP. Exercise scenarios should look to incorporate expanded causative events that go beyond equipment malfunctions or operator actions in an all-hazards approach that takes into account site-specific hazards (e.g., adjacent chemical plants, hazardous material storage facilities, railways, etc.), applicable regional natural events (e.g., earthquakes, hurricanes), seasonal conditions, and hostile action scenarios.All-hazard events should be considered as scenario initiating events, based on applicability to site, provided that they do not become the primary focus of the exercise or detract from the demonstration of REP capabilities. All-hazards events may include but are not restricted to:§ Natural events historically applicable to the area (e.g., hurricane, tornado, earthquake, flooding);	Rejected	Text similar to the commenter's suggestion is already found elsewhere in the Part III Introduction.
D. More Realistic Conditions	FEMA-2008-0022-0113-150b	North Carolina Division of Emergency Management, Stephen Payne	(continued)§ Site-specific all-hazards events (e.g., accident involving near-site facility, train derailment on or adjacent to site owner controlled area). These events should not be limited to the impact on nuclear power plant structures or components but also consider the impact on ORO resources and command and control. The initiating event(s) should not prevent the OROs from successfully demonstrating required REP criteria.§ Seasonal factors impacting the protective action recommendations and decision process (e.g., transient populations, weather conditions, agricultural seasons).Hostile action exercises present unique challenges for both NPP licensee's and OROs. Local and State response agencies may become overwhelmed more quickly when responding to both the hostile action threat and the public health threat posed by a radiological release. In addition, the hostile action scenario would involve a response by Federal, State, and local organizations not normally involved in a REP exercise.A minimum of one exercise per exercise cycle, at a frequency of at least once every 8 years, must involve a hostile action scenario. A hostile action exercise can coincide with either a release		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
D. More Realistic Conditions	FEMA-2008-0022-0113-150c	North Carolina Division of Emergency Management, Stephen Payne	(continued) scenario or “no release” scenario. Extent of play discussions should consider varying attack scenarios as applicable to the NPP site. Such scenarios may: § Differ between each exercise cycle to reflect various scenarios considered applicable to the site (e.g., insider threat; ground, waterborne, or airborne attacks; or a combination); § Include equipment/component failures (e.g., failure of an emergency diesel generator or ECCS pump to start, failure of containment to isolate) to facilitate escalation in ECL or radiological release potential; and/or§ Include Federal players. However, OROs will not be evaluated based on Federal play. “		
D. More Realistic Conditions	FEMA-2008-0022-0108-162	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-19 Line: 9-10 Comment: "At least one exercise scenario per [6-year] exercise cycle, at a frequency of at least once every eight years." Be aware that if you rely on the eight year cycle, then every 4th 6-year cycle it is possible to skip an exercise of this nature.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
D. More Realistic Conditions	FEMA-2008-0022-0121-105	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -19 Line: 12 Comments: Is the exercise cycle 6 years of 8 years? If there is no release--how will state demonstrate those exercise criterion related to release activities such as comparing field data to release projections?	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
D. More Realistic Conditions	FEMA-2008-0022-0113-151	North Carolina Division of Emergency Management, Stephen Payne	Page III—19, Line 15-17"RECOMMENDATION/COMMENT: DELETE BASIS: While it is possible to have other threats simultaneously to a terrorist attack on an NPP, including simultaneous attacks or threats to other facilities at the regional or local level into a REP hostile action exercise is a recipe for failure by creating a "No Win" situation for the ORO. The object of the exercise is to create a situation for the ORO to respond to AT THE NPP - not see how many simultaneous events it takes to fail the system.	Noted	The use of scenarios containing multiple threats is only an option, not a requirement.
D. More Realistic Conditions	FEMA-2008-0022-0108-163	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-19 Line: 32-33 Comment: Could "seasonal factors" be injected?	Noted	Response: Yes.
E. Scenario Injects					
E. Scenario Injects	FEMA-2008-0022-0113-152	North Carolina Division of Emergency Management, Stephen Payne	Page III-19, Line 35 RECOMMENDATION/COMMENT:INSERT AS FOLLOWS:"e. Additional Scenario Variations. Each organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m. once per exercise cycle. Exercises should be conducted under various weather conditions. Some exercises should be unannounced."	Modified	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. See the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
E. Scenario Injects	FEMA-2008-0022-0108-164	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-19 Line: 36-37 Comment: Will OROs be negatively evaluated if there are no scenario injects during "lulls?"	Noted	No, OROs are not required to fill exercise time during lulls. However, evaluation continues during lulls. OROs choose what to do during this time. Extended lulls can be avoided through the extent of play and scenario development.
G. Separate Plume and Ingestion					
G. Separate Plume and Ingestion	FEMA-2008-0022-0108-165	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-20 Line: 23-24 Comment: FEMA regions and OROs are typically busy. Has anyone performed an IPX that has been "separated by days or months" from the PPX? Although the exercise week is hectic, separating the phases seems inefficient and more difficult to schedule.	Noted	This approach has been used. It is an option, not a requirement.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
G. Separate Plume and Ingestion	FEMA-2008-0022-0108-166	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-20 Line: 25-27 Comment: This statement appears to indicate that OROs are not demonstrating the IPX criterion effectively. If FEMA feels that OROs are not adequately or comprehensively performing IPX duties without additional time, then FEMA should require the separation.	Noted	REP Program Manual language is describing an optional course of action.
III.B.3 Evaluating Exercises					
III.B.3 Evaluating Exercises	FEMA-2008-0022-0073-056	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-21Comment: Lines 2-9. The paragraph discusses what the qualifications are for exercise evaluators. In the past, we have had evaluators that are not subject matter experts in the area that they are evaluating. While it isn't necessary for every evaluation area, we find that it lends credibility to the evaluator if they have a background in the area that they are evaluating (e.g., law enforcement/security, fire, Health Physics, medical). Recommend that an additional sentence be added to the paragraph that states that every effort will be made to assign evaluators to the discipline areas from which they came from. If they do not have that level of expertise, then they should have a minimum of six "under instruction" evaluations with a subject matter expert for all evaluations in areas outside their normal field of expertise. Potential Impact: When an evaluator comes to an exercise and does not have enough experience or knowledge for the area(s) that they are evaluating then they are cheating themselves and the evaluated entity of a good quality evaluation. Not understanding some of the common operating doctrines, terminology, and perspectives of the particular emergency discipline that they are evaluating can lead to a lower quality evaluation that is truly needed to help ensure the safety of the public.Comment By: State/Locals	Noted	The REP evaluator credentialing program is under revision and will be integrated into the HSEEP implementation strategy.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.3 Evaluating Exercises	FEMA-2008-0022-0106-074	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-21, Lines 10 - 17Comment: As FEMA is now insisting that the HSEEP be used in order for everyong to be NIMS compliant, it should also be using HSEEP terminology and not terminology only specific to REP.Potential Impact: Not compliant with NIMS as common terminology is not used.	Noted	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modificiations to Evaluation Criterion A.1.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
identifying issues					
identifying issues	FEMA-2008-0022-0106-075	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-21, Line 18 thru Page III-22, Line 28; Page III-26, Lines 5-thru Page III-27, Line 15 and in other areas as well.Comment: The HSEEP process for exercise and evaluation is one that is "no-fault". In other words, the reason for exercising and evaluating the exercises is to test plans and procedures and then address any short-comings without finding fault or pointing fingers. The NRC/FEMA REP process is and has always been one of fault finding, finger pointing and being punitive in nature. While it is understood that the present REP exercise and evaluation program is written into law, NRC/FEMA seem to want to continue to manage the REP program without seeking change to be wholly complian with HSEEP, and in the process offending private agencies and volunteers to the point they may not participate in future exercises.Potential Impact: Not compliant with NIMS as common terminology is not used.	Noted	The REP Program cannot be entirely no-fault or self-evaluated. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
identifying issues	FEMA-2008-0022-0106-076	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-21, Line 18 thru Page III-22, Line 28; Page III-26, Lines 5-thru Page III-27, Line 15 and in other areas as well.Comment: As it is unlikely that NRC/FEMA will seek to change the federal regulations which conflict with HSEEP and thus not be in compliance with NIMS and the HSEEP process, FEMA should at the very least institute an adjudication process that allows for the appeal of ARCAs and DEFICIENCIES (due to their punitive nature) to FEMA Headquarters and to include an Administrative Law JudgePotential Impact: Provide State, Local and Private Agencies a means of arbitration other than responding to "findings" which more than likely will not be overturned at the Regional Level as it was the Region which made the finding in the first place.	Noted	FEMA REP exercises are part of 44 CFR Part 350. The provisions in 44 CFR Part 350.15 describe a process to appeal Deficiencies. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
identifying issues	FEMA-2008-0022-0108-167	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-21 Line: 22-24 Comment: FEMA reports used to contain "recommendations for improvement" (RFI). Will the RFIs be objective? Will FEMA evaluate the next exercise based upon the RFIs introduced into the last report? Will the RFIs be tracked? It would be preferable, if RFIs are introduced, that they be addressed independently of the report.	Noted	RFIs as previously used are not being re-introduced. In addition to ARCAs and Deficiencies, the improvement plan will include recommendations based on observations that are not ARCAs or Deficiencies. OROs are responsible for deciding how to track items in their improvement plan. FEMA will not track these for any kind of re-demonstration.
identifying issues	FEMA-2008-0022-0113-153	North Carolina Division of Emergency Management, Stephen Payne	." Page III-19, Line 25-29 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"An observed or identified inadequacy of organizational performance in an exercise that could cause a finding of "No Reasonable Assurance" that offsite emergency preparedness is adequate to provide appropriate protective measures 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.BASIS: Less wordy and more easily understood.	Rejected	The existing language is consistent with the regulatory language in 44 CFR Part 350.5(b). The commenter's suggestion is noted for future revision to 44 CFR Part 350.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
identifying issues	FEMA-2008-0022-0113-154	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-21, Line 36- 37 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“: “. . . classified as a Deficiency, the RAC Chair must immediately notify the State Agency Director with REP Program oversight, State REP Program Manager and Technology Hazards Division (THD) Director . . .”	Rejected	The existing language is appropriate. The RAC Chair must first notify the THD Director. However, the RAC Chair is also in communication with appropriate State officials whenever there is an issue that may affect reasonable assurance.
classifying issues					
classifying issues	FEMA-2008-0022-0110-047	Alabama Emergency Management Agency, J Frank Price	page III-22, line 2: Allowing the RAC Chair to determine overall exercise performance per issue again causes problems with realistic play. Using HSEEP that has areas that need improving (ARCA) instead of deficiencies should be adequate for OROs.	Rejected	The comment is inconsistent with FEMA and REP regulations and best practices. Consistent with 44 CFR Part 353, Appendix A, Part I.C, FEMA evaluates exercises to assess reasonable assurance that ORO plans are adequate to protect the health and safety of the public. These evaluations may result in findings of deficiencies requiring remedial action.
classifying issues	FEMA-2008-0022-0073-058	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-22Comment: Effective evaluation of REP program exercises relies upon the ability of each specific DHS/FEMA region to ensure that the exercise evaluators are provided with ORO plans and procedures in a timely manner. It is also incumbent upon the RAC Chair to ensure that the evaluators have read and understand how the region ORO's execute their specific REP Plans and Procedures.Potential Impact: Not having an opportunity to redemonstrate during an exercise could lead to a Deficiency which would require redemonstration and the associated expenses. Having the ability to immediately redemonstrate would still allow for the documentation of the finding but would preclude the additional expenses assuming that the redemonstration is properly performed.	Noted	The RAC chair determines which criteria are eligible for on-the-spot correction, and the information can be documented in the extent of play. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise. The process for correcting deficiencies is described in Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.The cited bullet has been deleted.
classifying issues	FEMA-2008-0022-0087-020	South Carolina Emergency Management Division, Danny Loomis	Page 111-22 (lines B-ll); Is the Intent of the language in paragraph 2 such that any criterion eligible for re-demonstratlon be negotiated and documented in the EOPA? It would be a good step forward with all jurisdictions Involved in the exercise to know exactly what Is allowed with regards to re-demonstration from the beginning of the planning process.	Noted	The RAC chair determines which criteria are eligible for on-the-spot correction, and the information can be documented in the extent of play. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise. The process for correcting deficiencies is described in Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.The cited bullet has been deleted.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
classifying issues	FEMA-2008-0022-0020-044	Ashtabula County EMA, George Rolland	Page Ref. III-22 Comment: Line 10-12 - if FEMA finds inadequate geographical description, counties request the chance to do "on-the-spot" changes to EAS message to clear the Deficiency. Comment by: Locals	Modified	The RAC chair determines which criteria are eligible for on-the-spot correction, and the information can be documented in the extent of play. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise. The process for correcting deficiencies is described in Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.The cited bullet has been deleted.
classifying issues	FEMA-2008-0022-0021-044	Geauga County DES, Dale Wedge	Page Ref. III-22 Comment: Line 10-12 - if FEMA finds inadequate geographical description, counties request the chance to do "on-the-spot" changes to EAS message to clear the Deficiency. Comment by: Locals	Noted	The RAC chair determines which criteria are eligible for on-the-spot correction, and the information can be documented in the extent of play. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise. The process for correcting deficiencies is described in Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.The cited bullet has been deleted.
classifying issues	FEMA-2008-0022-0036-044	Lake County EMA, Larry Greene	Page Ref. III-22 Comment: Line 10-12 - if FEMA finds inadequate geographical description, counties request the chance to do "on-the-spot" changes to EAS message to clear the Deficiency. Comment by: Locals	Noted	The RAC chair determines which criteria are eligible for on-the-spot correction, and the information can be documented in the extent of play. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise. The process for correcting deficiencies is described in Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.The cited bullet has been deleted.
classifying issues	FEMA-2008-0022-0113-155	North Carolina Division of Emergency Management, Stephen Payne	." Page III-22, Line 13-20RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"A Deficiency may be assessed when the collective impact of multiple (two or more) ARCAs on an organization's emergency response adversely impacts adequate protection of public health and safety. Multiple exercise issues may be an indication of a more severe problem. If the combined effect of these issues cause a finding of "No Reasonable Assurance" that offsite emergency preparedness is adequate to provide appropriate protective measures 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, then a single Deficiency should be assessed, rather than multiple ARCAs."	Rejected	FEMA disagrees that the suggested changes improve the REP Program Manual text. "Two or more" means the same thing as multiple, so adding the word multiple is redundant. The suggested change in the third sentence conflicts with the original text that was cited directly from 44 CFR Part 350.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
correcting issues immediately					
correcting issues immediately	FEMA-2008-0022-0104-005	Oregon Department of Energy, Shelley Carson	pg III-23, lines 5-21 Oregon agrees with the section, Correcting Issues Immediately. This is an ideal training tool that allows effectivetraining of emergency responders when they make a mistake. It enables the controller during exercise play to explain the mistake and how to fix it giving the responder a direct reference to gain knowledge from. Recommendation: Continue to allow on-the-spot training and correcting of issues.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. Yes, on-the-spot training/correction is encouraged where possible. Immediate re-demonstration of issues is negotiated between OROs and FEMA. Each Region's RAC Chair determines the criteria that are eligible for re-demonstration. During the extent-of-play negotiations and development, each ORO requests the criteria to be allowed for re-demonstration during the exercise. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise.
correcting issues immediately	FEMA-2008-0022-0113-156	North Carolina Division of Emergency Management, Stephen Payne	Page III-23, Line 5-21RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"The ability to correct issues during the play of the exercise is negotiated between State, local, and tribal governments and FEMA. Each Region RAC Chair determines the criterion that is eligible for re-demonstration. Prior to extent-of-play development, each State and/or County will request the criterion to be allowed for re-demonstration for the exercise. The determination of which REP functions and activities could be candidates for immediate correction are agreed upon during the extent-of-play negotiations.During integrated exercises where the correction of an identified issue would not interrupt the flow of the exercise or during tabletop exercises (TTX), drills, and other demonstrations conducted out-of-sequence, participants may re demonstrate an activity that the ORO or FEMA has determined was not satisfactorily demonstrated. During the exercise, an evaluator noting that a criterion was not performed correctly will advise the appropriate controller that an action was not done according to plans and procedures. The controller or other ORO personnel will re-train the staff that performed the criterion incorrectly. After the training is completed, those emergency workers will re-demonstration the criterion again. If they performed that criterion correctly, it will show in the report as an ARCA but with a follow-on statement will show that it was corrected on-the-spot." Participants, State & local OROs should be given the opportunity to stop, retrain and re-demonstrate an activity they have self identified as not being in accordance with the required evaluation criteria.	Modified	The cited REP Program Manual text has been modified to read, "In some circumstances, an issue may be corrected immediately, during the play of the exercise. Immediate re-demonstration of issues is negotiated between OROs and FEMA. Each Region's RAC Chair determines the criteria that are eligible for re-demonstration. During the extent-of-play negotiations and development, each ORO requests the criteria to be allowed for re-demonstration during the exercise." See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
correcting issues immediately	FEMA-2008-0022-0073-084	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-23Comment: Line 16-21. Correcting Issues Immediately. This concept is key in allowing responding agencies to perform "on the spot" training and be re-evaluated in the event an Area Recommended for Corrective Action (ARCA) is identifiedPotential Impact: RECOMMENDATION: DHS/FEMA retains this ability and encourages its use during REP program exercises.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. Yes, on-the-spot training/correction is encouraged where possible. Immediate re-demonstration of issues is negotiated between OROs and FEMA. Each Region's RAC Chair determines the criteria that are eligible for re-demonstration. During the extent-of-play negotiations and development, each ORO requests the criteria to be allowed for re-demonstration during the exercise. See Part III.B - REP Exercise Process, Section 6.b.5 - Documenting REP Exerices, Documenting Exercise Issues, Correcting Issues During the Exercise.
correcting issues immediately	FEMA-2008-0022-0110-048	Alabama Emergency Management Agency, J Frank Price	page III-23, lines 23-25: This could be a HSEEP's corrective action plan that would be developed jointly with FEMA and OROs. This will allow for tracking of items for other plants to review.	Rejected	This comment is inconsistent with FEMA regulations and best practices. The commenter is referring to the requirement to correct Deficiencies within 120 days. Deficiencies are included in the AAR, but still must be corrected within 120 days according to regulation. Deficiencies are site-specific, but lessons learned are shared on FEMA's LLIS website.
reporting plan issues					
reporting plan issues	FEMA-2008-0022-0108-168	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-24 Line: 21 Comment: Typo - "P/ant" should be "Plant."	Accepted	The REP Program Manual has been amended as suggested. Part III.B - REP Exercise Process, Section 6.b.3 - Documenting REP Exericises, Documenting Exercise Issues, Standardized Exercise Issue Numbering.
renumbering issues					
renumbering issues	FEMA-2008-0022-0088-007	Anonymous	Page III-26, lines 2-4: "It is not necessary to renumber issues assessed in previous exercises. This holds true regardless of whether or not the issues were resolved during the current exercise. Only new issues should be assigned Standard Exercise Issue Numbers." The first sentence should be reworded to strongly state that issues should not be re-numbered. When issues are re-numbered, it confuses the process of tracking them.	Modified	The paragraph addressing re-numbering of exercise issues has been deleted. See Part III.B - REP Exercise Process, Section 6.b.4 - Documenting REP Exerices, Documenting Exercise Issues, Assigning Exercise Issue Numbers.
evaluation area status					
evaluation area status	FEMA-2008-0022-0108-169	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-26/B-16 Line: 20/29-35 Comment: A table listing an example of "justifiable reasons" or a reference to the glossary should be provided .	Accepted	A reference to the glossary entry for "Not Demonstrated" has been added to the cited text. See Appendix B - Glossary of REP Terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
exemption from demonstration					
exemption from demonstration	FEMA-2008-0022-0113-157	North Carolina Division of Emergency Management, Stephen Payne	." Page III-26, Line 23RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"FEMA may grant an ORO an exemption from demonstration of one or more Evaluation Area Criteria within a biennial exercise cycle if the ORO has conducted the criteria during an actual emergency or as part of another exercise."	Rejected	FEMA disagrees with deleting the words "one-time."
exemption from demonstration	FEMA-2008-0022-0113-158	North Carolina Division of Emergency Management, Stephen Payne	Page III-26, Line 29 RECOMMENDATION/COMMENT: INSERT THE FOLLOWING:"FEMA may grant an ORO or jurisdiction an exemption from demonstration of one or more Evaluation Area Criteria within a biennial exercise cycle if the ORO is the only organization that demonstrates the criteria. This Non-Participation must be included in the Exercise Extent of Play document or Exercise Plan."BASIS: A jurisdiction that has only one Congregate Care Center; under Criterion 6.c – Temporary Care of Evacuees has to demonstrate this location only ONCE per exercise cycle. This means that an exemption or a Non-Participation will need to be included in the Exercise Extent of Play document or Exercise Plan	Rejected	The existing REP Program Manual language is adequate. This is dealt with on the Regional level.
exemption from demonstration	FEMA-2008-0022-0113-159	North Carolina Division of Emergency Management, Stephen Payne	."Page III-26, Line 29 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"When an exemption is granted . . ."	Accepted	The REP Program Manual language on exercise credit has been modified. The cited sentence has been deleted. See Part III.B - REP Exercise Process, Section 7 - REP Program Credit for Participipition in Actual Incidents.
exemption from demonstration	FEMA-2008-0022-0113-160	North Carolina Division of Emergency Management, Stephen Payne	." Page III-27, Line 11-13RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"If a local jurisdiction or functional entity does not demonstrate an Evaluation Area Criterion, the RAC Chair should carefully review and consider the facts surrounding the failure to demonstrate the Evaluation Area Criterion."	Accepted	The cited sentence has been deleted in further revisions of Part III.B - REP Exercise Process.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
post-exercise briefings					
post-exercise briefings	FEMA-2008-0022-0110-049	Alabama Emergency Management Agency, J Frank Price	page III-27, line 17; does this mean that HSEEP hot washes will not be performed? Both requirements can be met; and to conduct REP exercises in compliance with HSEEP the guidance should be followed.	Noted	This section of the REP Program Manual has been re-written for clarity. HSEEP hotwashes can take place. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
post-exercise briefings	FEMA-2008-0022-0100-027	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-27, Lines 17 and 18 refer to the post exercise participant briefings and public meetings required by 44 CFR 350.9(a), (d) and (e). Some changes to the language of 44 CFR 350 may be required to address some items such as the HSEEP "Hotwash".	Noted	Changes to 44 CFR Part 350 are outside of scope of the REP Program Manual. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
post-exercise briefings	FEMA-2008-0022-0080-027	Douglas Fleck	Page III-27, Lines 17 and 18 points out yet another difference between HSEEP and REP concerning hot washes versus public meetings versus debriefs yet falls back on the excuse that the REP exercise must be different because of a FEMA regulation. The REP program should be forced to adopt HSEEP totally – not just the parts it likes. It s is long past time to change the antiquated NUREG-0654.	Noted	The exercise participants meeting and the public meeting do not take the place of hotwashes. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
post-exercise briefings	FEMA-2008-0022-0080a-026	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-27, Lines 17 and 18 points out yet another difference between HSEEP and REP concerning hot washes versus public meetings versus debriefs yet falls back on the excuse that the REP exercise must be different because of a FEMA regulation. The REP program should be forced to adopt HSEEP totally – not just the parts it likes. It s is long past time to change the antiquated NUREG-0654.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
post-exercise briefings	FEMA-2008-0022-0113-161	North Carolina Division of Emergency Management, Stephen Payne	.“ Page, III-27, Line 18-21 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“Within 48 hours of completion of the exercise, the Regional Administrator, or designee (RAC Chair) should conduct two meetings – one with participants only to discuss preliminary results, and one with the public to discuss the evaluation of the exercise.” BASIS: 44 CFR § 350.9(a), (d) & (e) do not require exercise participants to attend the public meeting . required of the FEMA Regional Administrator by 44 CFR § 350.9(e).	Modified	The cited sentence has been modified to read, "The RAC Chair conducts two meetings – one with participants only to discuss preliminary results, and one to include the public to discuss the evaluation of the exercise." See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.
post-exercise briefings	FEMA-2008-0022-0113-162	North Carolina Division of Emergency Management, Stephen Payne	;”Page, III-27, Line 26-27 RECOMMENDATION/COMMENT: DELETEBASIS:As written, this seems to indicate the biennial exercises are a combined NRC/FEMA evaluated activity. Will FEMA and NRC evaluators be cross evaluating criterion? This is a violation of the intent of NUREG-0645/FEMA Rev 1 for NRC to focus on licensee activity (INSIDE the fence) and FEMA to focus on ORO activity (OUTSIDE the fence).	Modified	REP Program Manual language has been modified to separate discussions of participants' meetings and public meetings. NRC and FEMA do not evaluate exercise activities outside of their areas of responsibility. NRC and FEMA both participate in the public meeting to provide full representation. See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
post-exercise briefings	FEMA-2008-0022-0093-027	Texas Department of State Health Services, Bob Free	Page III-28 Lines 1-4, 3.e – Conducting Post - exercise participant briefings and public meetings This paragraph discusses the presentations during the participants' meeting. It provides guidance on the content of the presentations and, further states that "…no attempt should be made to classify issues as Deficiencies or ARCA's". This conflicts to some extent with guidance on page III-23 line 4-12, Correcting Issues Immediately. This guidance indicates that an issue could be identified during a drill and can be corrected on-the-spot. The item then appears in the exercise report as a corrected ARCA. This implies the ARCA was determined during the exercise and before the participants meeting. If that is true, then it follows that other issues which may become ARCA's or Deficiencies could be identified. The guidance should be changed to read "They should include commendations for good performance and a preliminary assessment of strengths and weaknesses that include specific issues which could be classified as ARCA's or Deficiencies of the demonstration".	Modified	The post-exercise debrief is not the only place potential exercise issues are discussed. FEMA is in constant communication with OROs regarding potential issues discovered during exercises. The REP Program Manual section on Post-exercise Participant Briefings has been amended to read that the "At this stage, the RAC Chair may discuss potential exercise issues, but they should not be made classified as Deficiencies or ARCAs at this time." See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.
post-exercise briefings	FEMA-2008-0022-0117-032	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIB, page III-28, Line 3 to 4 - At this stage, no attempt should be made to classify issues as Deficiencies or ARCAsComments: This is incorrect. Possible Deficiencies and ARCAs must be pointed out at this stage. Corrected ARCAs must be cited as well as a matter of public safety. The ARCAs and Deficiencies must be pointed out as soon as possible so corrective actions can be implemented to better serve the public good. explanation/RecommendatioN: Please change the sentence to say "At this stage known deficiencies and ARCAs will be briefed in addition to areas that may have had problems and require additional scrutiny." This allows the FEMA evaluators to both brief known issues and carefully examine their findings to provide additional critique in the official findings letter.	Modified	The post-exercise debrief is not the only place potential exercise issues are discussed. FEMA is in constant communication with OROs regarding potential issues discovered during exercises. The REP Program Manual section on Post-exercise Participant Briefings has been amended to read that the "At this stage, the RAC Chair may discuss potential exercise issues, but they should not be made classified as Deficiencies or ARCAs at this time." See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
post-exercise briefings	FEMA-2008-0022-0128-032	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-28, line 3 – 4: At this stage, no attempt should be made to classify issues as Deficiencies or ARCAsCOMMENTs: The ARCAs and Deficiencies must be pointed out as soon as possible so corrective actions can be implemented to better serve the public good. It is unconscionable to withhold possible threats to the communities for no better reason than the wish for a non-confrontational out-brief.Explanation/recommendation: Recommend modifying to state: “At this stage known deficiencies and ARCAs will be briefed in addition to areas that may have had problems and require additional scrutiny.” This allows the FEMA evaluators to both brief known issues and carefully examine their findings to provide additional critique in the official findings letter.	Modified	The post-exercise debrief is not the only place potential exercise issues are discussed. FEMA is in constant communication with OROs regarding potential issues discovered during exercises. The REP Program Manual section on Post-exercise Participant Briefings has been amended to read that the "At this stage, the RAC Chair may discuss potential exercise issues, but they should not be made classified as Deficiencies or ARCAs at this time." See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.
post-exercise briefings	FEMA-2008-0022-0113-163	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-28, Line 8-9RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“The meeting should include representatives from FEMA, NRC, and other participating Federal agencies. Members of the public and media may attend as observers. BASIS: 44 CFR § 350.9(e) does not require ORO participation in the FEMA public meeting.	Rejected	44 CFR § 350.9(e) States that the meeting "will include the exercise participants, representatives from the NRC….". Because this may include the OROs, FEMA has revised the REP Program Manual language to clarify that OROs are invited but not required.
post-exercise briefings	FEMA-2008-0022-0113-164	North Carolina Division of Emergency Management, Stephen Payne	.”Page III-28, Line 14-15RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“The FEMA Regional Administrator, after consultation with the OROs, should solicit written questions and comments during the public meeting. Written responses will be provided to these questions and comments by the Region REP Staff responsible for the exercise.”	Modified	The REP Program Manual language has been modified to state, "At the Regional Administrator’s (or designee’s) discretion, written comments from the public and media may be accepted during or after the meeting. Copies of each written submission, along with a written response, are retained by the FEMA Regional Office. " See Part III.B - REP Exercise Process, Section 5.c - Conducting REP Exercises, Conducting Post-Exercise Meeting.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.4 Improvement Planning					
III.B.4 Improvement Planning	FEMA-2008-0022-0110-050	Alabama Emergency Management Agency, J Frank Price	page III-28, line 25: Improvement Planning as defined here is the standard FEMA way. Improvement planning is a process in HSEEP that can have the FEMA goals included.	Noted	The REP Program cannot be entirely no-fault or self-evaluated. FEMA is mandated by regulations to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.4 Improvement Planning	FEMA-2008-0022-0129-042	Wisconsin Emergency Management, Teri Engelhart	Page: III-28, Line: 32 - 33 Comment: The sentence "The State may also respond to both the classification of Deficiencies and the time frames for completing corrective actions." The intent of this sentence is unclear; please provide additional explanation	Modified	REP Program Manual language has been modified to read, "Within 20 days of the exercise, the State acknowledges receipt of this letter and may either propose a schedule for remedial actions or appeal the classifications of Deficiencies." The intent is to establish the State's options for responding to a letter of deficiency. See Part III.B - REP Exercise Process, Section 6.e - Documenting REP Exerices, Notifying the State of Deficiencies.
III.B.4 Improvement Planning	FEMA-2008-0022-0108-170	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-28 Line: 34 Comment: Grammar? - "The RAC Chair should prepare for the State for the Regional Administrator's signature." Something is wrong with the statement.	Accepted	The cited sentence has been amended to read, "The RAC Chair should prepare a letter to the State that will be signed by the Regional Administrator (or designee)." See Part III.B - REP Exercise Process, Section E - Notifying the State of Deficiencies.
III.B.4 Improvement Planning	FEMA-2008-0022-0113-166	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-28, Line 37RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:The FEMA Regional Administrator or their designee BASIS: Wording change easily and grammatically eliminates the awkward :”his/hers” wording.Using DOD writing guidance as precedence, use of the pronoun “he” (or derivates) is understood to be unisexual and the use of he/she terminology is not necessary.	Modified	The cited REP Program Manual text has been modified to read, "The FEMA Regional Administrator or designee..." See Part III.B - REP Exercise Process, Section 6.e - Documenting REP Exerices, Notifying the State of Deficiencies.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.4 Improvement Planning	FEMA-2008-0022-0093-022	Texas Department of State Health Services, Bob Free	Part III.B.4.a, Page III.28 –Notify OROs Responsible for the Deficiency FEMA should notify the local Offsite Response Organization (ORO) responsible for a negative exercise finding in addition to notifying the State. Some Deficiencies are identified at a local level, and may be re-demonstrated without the participation of the State agency. Lines 39-40 state that “participation in remedial exercises should be limited to the OROs having the deficiencies”. The offsite organization responsible for correcting the negative finding may not be a State agency, but a Local ORO.	Rejected	REP Program Manual notes, "to the extent possible." FEMA Regions coordinate with their State point of contact per established protocol. The existing language is adequate.
III.B.4 Improvement Planning	FEMA-2008-0022-0093-023	Texas Department of State Health Services, Bob Free	Lines 6-7 on Page III-29 state that “the primary reason for providing States with formal documentation of Deficiencies is to facilitate prompt correction of these identified problems”. Including the affected local ORO in the FEMA notification process will ensure and improve the correction process and provide a gesture of courtesy to local OROs and their elected officials.	Noted	FEMA Regions coordinate with their State point of contact per established protocol.
III.B.4 Improvement Planning	FEMA-2008-0022-0106-077	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Page III-28, Line 27 thru Page III-29, Line 14Comment: FEMA should not specify a specific number of days for notification and acknowledgement of notification unless FEMA itself fully intends to meet those timelines. If FEMA fully intends to meet the specified number of days, then the paragraph in Lines 8 through 14 on page III-29 are not necessary. Additionlly, the paragraph in Lines 8 through 14 only provides an "Out" for FEMA not for States, Locals and Private Agencies who participate in the exercise. What's good for one agency ought to be good of the others. If FEMA is going to keep specifying a set number of days in which to complete something, then the paragraph in Lines 8 through 14 should read that if FEMA fails to provide documentation to the State within the specified 10 days, the Deficiency is reduced to an ACRA, but with a recommendation that the ORO redemonstate.Potential Impact: Again, another example of the NRC/FEMA vs. States, Locals, and Private Agencies and which creates anomosity.	Modified	FEMA's intent is to meet every deadline and coordinate with OROs. A Deficiency cannot be reduced to an ARCA because a Deficiency affects the health and safety of the public. The REP Program Manual text has been modified include the following sentence after the cited text: "Similarly, if the State experiences administrative delays due to extenuating real-world incidents/circumstances which would impact the State’s ability to respond to these timelines, FEMA will take this into consideration." See Part III.B - REP Exercise Process, Section 6.e - Documenting REP Exerices, Notifying the State of Deficiencies.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.4 Improvement Planning	FEMA-2008-0022-0113-167	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-29, Line 6-12 RECOMMENDATION/COMMENT: DELETEBASIS: Delays in accomplishing administratively requisite activity should be understood to be an across the board condition. As written, this paragraph is a disclaimer that allows ONLY FEMA to adjust the time line if necessary and NOT be held responsible for any consequences. It is recognized that Deficiencies should be corrected in an expeditious manner, administrative delays due to response to real-world events/activity for BOTH FEMA and the ORO should be recognized. This documentation should be at a level of importance that this type of legal disclaimer is not required.	Modified	FEMA's intent is to meet every deadline and coordinate with OROs. The REP Program Manual text has been modified include the following sentence after the cited text: "Similarly, if the State experiences administrative delays due to extenuating real-world incidents/circumstances which would impact the State’s ability to respond to these timelines, FEMA will take this into consideration." See Part III.B - REP Exercise Process, Section 6.e - Documenting REP Exerices, Notifying the State of Deficiencies.
III.B.4 Improvement Planning	FEMA-2008-0022-0101-076	Florida Division of Emergency Management, Michael Younger	Page III-29, line 13 This section refers to after action reports but appears to be consistent with items and procedures associated with the standard exercise report format. With the incorporation of HSEEP into the exercise process, there must be a clear separation of terminology associated with the SERF and HSEEP processes	Noted	The SERF has been superseded by the AAR. The REP Program Manual is being checked for consistency of terminology with HSEEP as appropriate.
After Action Reports					
After Action Reports	FEMA-2008-0022-0093-024	Texas Department of State Health Services, Bob Free	Part III.B.4.b, Page III-29 –Include All Participating OROs when Sending the FEMA Draft Exercise Report FEMA should notify all other OROs who participate in an evaluated exercise in addition to notifying the State. Draft REP Manual Page III-4 in Exhibit III-1 states that within 30 days from the exercise a Draft After Action Report and Improvement Plan (AAR/IP) will be provided by FEMA Regions to Offsite Response Organizations (OROs) for review and within 60 days OROs will send their comments directly to the FEMA Region. This HSEEP integrated process conflicts with FEMA’s statement that they will submit draft after action reports only to the State. The State of Texas continues to share FEMA draft exercise reports with local agencies and power plants who participated in the exercise. Hosting power plants, local OROs and their elected officials should be added to the FEMA notification process when distributing the draft exercise report as a gesture of courtesy and overall improved relations between FEMA and the OROs. If limiting distribution of the draft exercise report is intended to prevent FEMA having to deal with multiple agencies, then instructions on how all exercise participant’s comments should be submitted back to FEMA (i.e., through the State) should be added to this section of the REP Manual for further clarification.	Noted	The FEMA RAC only shares the report with the State; however, the State may share the draft AAR and other exercise information with the utility and participating OROs.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
After Action Reports	FEMA-2008-0022-0113-168	North Carolina Division of Emergency Management, Stephen Payne	” Page 29, Line 18 RECOMMENDATION/COMMENT: DELETE AND REWORD AS FOLLOWS:“State(s) Agency/Organization with primary responsibility for REP program activity” BASIS: Not all States have the Emergency Management Organization as the primary agency responsible for execution of the REP program. In this case BOTH organizations should receive a copy.	Noted	FEMA understands that each State and local jurisdiction has its own specific authorities. The guidance in the REP Program Manual is intended to apply to the ORO responsible for the function in question. Language has been revised throughout the REP Program Manual to replace specific references to state, local, and Tribal organizations with "offsite response organizations," where appropriate.
After Action Reports	FEMA-2008-0022-0080-028	Douglas Fleck	Page III-29, Lines 26-28. Is it really necessary to instruct FEMA staff to correct errors in their work?	Accepted	The cited text has been deleted. See Part III.B - REP Exercise Process, Section 6.c Documenting REP Exericises, Developing the After Action Report.
After Action Reports	FEMA-2008-0022-0080a-027	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-29, Lines 26-28. Is it really necessary to instruct FEMA staff to correct errors in their work?	Accepted	The cited text has been deleted. See Part III.B - REP Exercise Process, Section 6.c Documenting REP Exericises, Developing the After Action Report.
After Action Reports	FEMA-2008-0022-0113-165	North Carolina Division of Emergency Management, Stephen Payne	.” Page III-29, Line 27-36 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“Within 2 days of the exercise, the RAC Chair initiates consultation with FEMA headquarters, RAC members, and the State in order to identify potential Deficiencies. As a result of this consultation process, and within 10 days of the exercise, The RAC Chair should prepare for the Regional Administrator’s signature a letter for the State that informing it of the following:(a) jurisdictions affected; (b) description of Deficiencies identified; (c) recommended remedial actions to correct the Deficiencies; and (d) recommended timeframe for completion of remedial actions. Within 20 days of receipt of this letter, the State acknowledges receipt and proposes a schedule for remedial actions. The State may also respond to both the classification of Deficiencies and the recommended time frames for completing corrective actions.”	Accepted	REP Program Manual has been amended as suggested, with additional modifications to clarify some of the language. It now reads, "Within 2 days of the exercise, the RAC Chair initiates consultation with FEMA Headquarters, RAC members, and the State in order to identify potential Deficiencies. As a result of this consultation process, the RAC Chair prepares a letter to the State that will be signed by the Regional Administrator (or designee). The letter includes: (a) jurisdictions affected; (b) description of Deficiencies identified; (c) remedial actions recommended to correct the Deficiencies; and (d) timeframe for completion of remedial actions. The Regional Administrator (or designee) forwards the letter within 10 days of the exercise to the State informing it of identified Deficiencies and the actions needed to correct the problem(s). Within 20 days of the exercise, the State acknowledges receipt of this letter and may either propose a schedule for remedial actions or appeal the classifications of Deficiencies." See Part III.B - REP Exercise Process, Section 6.e Documenting REP Exercises, Notifying the State of Deficiencies.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
After Action Reports	FEMA-2008-0022-0097-085	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-29 (line 30-31):COMMENT: Change to: "The FEMA Region will send the draft exercise report ….. for review and comment within 30 calendar days after the exercise."	Accepted	REP Program Manual has been amended as suggested. See Part III.B - REP Exercise Process, Section 6.c Documenting REP Exericises, Developing the After Action Report.
After Action Reports	FEMA-2008-0022-0116-095	Nuclear Energy Institute, Alex Marion	Part III.B.4.b I pg III-29 (line 30-31): "The FEMA Region will send the draft exercise report ….. for review and comment 30 calendar days after the exercise." Part III.B.4.b I pg III-29 (line 30-31): Change to: "The FEMA Region will send the draft exercise report ….. for review and comment within 30 calendar days after the exercise."Basis: Clarifying comment	Accepted	REP Program Manual has been amended as suggested. See Part III.B - REP Exercise Process, Section 6.c Documenting REP Exericises, Developing the After Action Report.
correction of Deficiencies					
correction of Deficiencies	FEMA-2008-0022-0113-169	North Carolina Division of Emergency Management, Stephen Payne	." Page 30, Line 23-24 RECOMMENDATION/COMMENT: DELETE & REWRITE AS FOLLOWS:"Correction of Deficiencies identified in an exercise must be demonstrated by a remedial exercise or other remedial actions, within 120 days of the exercise date."	Modified	The cited REP Program Manual text has been modified to read, "Correction of Deficiencies identified in an exercise must be demonstrated through a remedial exercise or other remedial actions, within 120 days of the exercise date." See Part III.B - REP Exercise Process, Section 6.g.1 - Documenting REP Exerices, Correction of Issues, Correction of Deficiencies.
correction of Deficiencies	FEMA-2008-0022-0113-170	North Carolina Division of Emergency Management, Stephen Payne	Page 30, Line 25 RECOMMENDATION/COMMENT: REVISE OR DECONFLICT:BASIS: As written this statement conflicts with guidance in paragraph 4.b After Action Reports which state "Evaluations occurring outside the 90-day timeframe will be issued as separate drill AARs. Drill AARs are due in 45 days."	Rejected	The two cited sections are not in conflict. AARs for Deficiencies are handled differently than those for out-of-sequence activities.
correction of Deficiencies	FEMA-2008-0022-0073-059	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-30Comment: Line 38. Recommend modify the existing sentence to say "(d) Enter and track corrective actions using... "Potential Impact: Clarifies who is responsible for entering the information into the DHS CAP System.	Accepted	The REP Program Manual has been amended as suggested. See Part III.B - REP Exercise Process, Section 6.g (1) Documenting REP Exericises, Correction of Issues, Correction of Deficiencies.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
correction of Deficiencies	FEMA-2008-0022-0113-171	North Carolina Division of Emergency Management, Stephen Payne	."Page III-31, Line2RECOMMENDATION/COMMENT: DELETE & REWRITE AS FOLLOWS:"If a Deficiency remains unresolved following the remedial exercise or other remedial actions, the AAR should clearly state: (a) specific actions taken to resolve the Deficiency during the initial 120-day period (if there is a valid reason for remedial action being taken beyond the 120-day time period it must be specified here); (b) delineates the specific corrective actions to be taken to resolve the Deficiency and timeline for completing those actions; and (c) establishes and implements a system for monitoring and documenting, on a bi-weekly basis, State and local governments and other OROs' continuing efforts and progress in resolving the Deficiency."	Rejected	Consistent with 44 CFR Part 353, Appendix A, Part I.C, it is FEMA's intent to focus on the accountability for reporting at the end of the 120-day period. The existing REP Program Manual language is adequate.
correction of Deficiencies	FEMA-2008-0022-0113-172	North Carolina Division of Emergency Management, Stephen Payne	Page III-31, Line 14 RECOMMENDATION/COMMENT: REMOVE & REPLACE WITH:"Technical Hazards Division (THD)" BASIS: This acronym has not been used recently enough in the document for readers to immediately understand the meaning.	Rejected	The term Technicological Hazards Division (THD) and the corresponding acronym identification are found the first time it is used, which is several pages previous to the instance cited by the commenter. It is also found in Appendix A, Abbreviations and Acronyms.
correction of Deficiencies	FEMA-2008-0022-0113-173	North Carolina Division of Emergency Management, Stephen Payne	Page III-31, Line 18 RECOMMENDATION/COMMENT: INSERT THE FOLLOWING AS NEW PARAGRAPH:Correction of ARCAs should be completed as soon as practicable and be verified before or during the next biennial exercise at that site. For States with multiple sites within their boundaries, the correction of an ARCA(s) for State activities that are not site-specific, may, at the discretion of the RAC Chair, be demonstrated during an exercise at another site within the State or where the 10-mile EPZ impacts the State. This section should be repeated in paragraph 4. Improvement Planning ascorrection of an ARCA is part of improving the response plan the same as correction of a Deficiency.	Modified	The cited REP Program Manual has been modified similarly to the commenter's suggestion. The discussion of correction of issues has been re-organized. See Part III.B - REP Exercise Process, Section 6.g.2 - Documenting REP Exerices, Correction of Issues, Correction of ACRAs.
III.B.5 Exercise Credit					
	FEMA-2008-0022-0129-044	Wisconsin Emergency Management, Teri Engelhart	Page: III-31, Line: 18 - 25 Comment: The criteria eligible for credit in a real event are very limited. Many criteria include activities that are conducted during various all-hazards responses. Additional criteria should be considered for real-world credit include; 1.c.1, 1.d.1, 1.e.1, 5.a.1, 5.a.3, 5.a.4, and 5.b.1.	Modified	The criteria eligible for credit in a real event are limited because of the specialized nature of REP activities. Exhibit III-2: Federal Evaluation Process Matrix, including criteria eligible for credit, has been revised. See Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0113-174	North Carolina Division of Emergency Management, Stephen Payne	." Page III-31, Line 21-22 RECOMMENDATION/COMMENT: REWRITE AS FOLLOWS:". . . FEMA will consider granting REP Program exercise credit to OROs for their response to an actual incident or participation in a National Exercise Program (NEP) event or any other . . ."	Rejected	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0110-051	Alabama Emergency Management Agency, J Frank Price	page III-31, line 24; I do not understand what is meant by "not granted for qualifying exercises." If credit is being allowed for qualifying exercises that demonstrate an evaluation item should it not be credited as the pervious line states that qualifying will be credited?	Noted	The cited sentence has been deleted.
III.B.5 Exercise Credit	FEMA-2008-0022-0108-171	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-31 Line: 26 Comment: FEMA should develop a form to assist with providing the required documentation and facts.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. Such forms are governed by OMB.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-176	North Carolina Division of Emergency Management, Stephen Payne	." Page III-31, Line 29-34 RECOMMENDATION/COMMENT: DELETE & REWRITE AS FOLLOWS:"Examples include activation or demonstration of Evacuation and Shelter-In-Place capability; Emergency Operations Center Management capability; survey and decontamination of persons and equipment capability, radiological environmental monitoring, monitoring for radiological contamination, and/or other activities successfully performed according to applicable ORO plans and procedures. " BASIS: Demonstration of activity such as evacuation & sheltering, monitoring & decontamination or EOC operations do not need to be tied to a possible radiological event to demonstrate the capability to meet criteria or capabilities applicable to the REP program.	Rejected	The existing language more accurately reflects FEMA's intent. The criteria eligible for real-world incident credit have been revised. Please see Exhibit III-2.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-175	North Carolina Division of Emergency Management, Stephen Payne	. Page III-31, Line 28-30 RECOMMENDATION/COMMENT: DELETE & RERITE AS FOLLOWS:"FEMA will consider granting OROs credit for REP exercise criteria when an ORO responds to an actual incident that demonstrates criteria or capabilities applicable to REP program activity."	Rejected	The existing language is very similar to the commenter's suggestion and more accurately reflects FEMA's intent.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0113-177	North Carolina Division of Emergency Management, Stephen Payne	Page III-31 Line 35-40 & Page III-32, Line 1-2DELETE & REWRITE AS FOLLOWS:"When requesting exercise credit for a response to an actual incident, OROs should ensure that the response included the following four elements:§ A prompt and timely mobilization of key State, local, and tribal government staff and providers responsible for emergency functions;§ An actual reporting of the key staff who, in accordance with the plans, would report to the facility;§ Activation of the facility(ies) of the responding jurisdiction(s); and§ Establishment of communication links among responding organizations. Activation and demonstration of Command & Control activity at an EOC or the establishment of sheltering locations do not need to have a direct tie to REP to demonstrate the capability to meet criteria or capabilities applicable to the REP program	Rejected	The existing language more accurately reflects FEMA's intent. Command and Control criteria are not eligible for credit.
III.B.5 Exercise Credit	FEMA-2008-0022-0080-029	Douglas Fleck	Page III-32, Line 2 begins the description of the documentation FEMA will require to grant REP exercise credit for a response to an actual event. This is an extreme example of a "big-brother" philosophy that points out a large level of distrust between FEMA and the state and local OROs. This documentation actually asks for sign in sheets and resources used – as if we would have any problem falsifying them if our desire was to lie about the response in the first place. This entire option should be removed because it is hard to believe that any ORO is going to waste the time and resources required to gather all of this data and put it in a format suitable for FEMA – all in the interest of getting out of a three or four hour canned exercise	Noted	The submitted documentation is standard protocol for requesting credit.
III.B.5 Exercise Credit	FEMA-2008-0022-0080a-028	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-32, Line 2 begins the description of the documentation FEMA will require to grant REP exercise credit for a response to an actual event. This is an extreme example of a "big-brother" philosophy that points out a large level of distrust between FEMA and the state and local OROs. This documentation actually asks for sign in sheets and resources used – as if we would have any problem falsifying them if our desire was to lie about the response in the first place. This entire option should be removed because it is hard to believe that any ORO is going to waste the time and resources required to gather all of this data and put it in a format suitable for FEMA – all in the interest of getting out of a three or four hour canned exercise.	Noted	The submitted documentation is standard protocol for requesting credit.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0113-178	North Carolina Division of Emergency Management, Stephen Payne	).” Page III-32, Line3-17 RECOMMENDATION/COMMENT: DELETE & REWRITE AS FOLLOWS:“The ORO should then provide the following documentation to FEMA:1. Type and nature of the incident;2. Timeline, to include arrival time of response for State, local and tribal staff at the facility;3. Any applicable incident documentation including sign in/sign out sheets with name(s), function(s), date(s), and time(s);4. Communications log(s) showing the establishment of communication links with other organizations;5. List of participating jurisdictions;6. Incident decisions made and implemented;7. Resources (facilities, equipment, etc.) used; and 8. Copy of any after-action documentation created.	Rejected	FEMA disagrees with the suggested change to omit information that links actual responders to REP responsibilities.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-179	North Carolina Division of Emergency Management, Stephen Payne	incident. Page III-32, Line 17-18 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“This information should be provided to the appropriate FEMA RAC Chair as part of a REP exercise extent-of-plan discussions.” BASIS: As written, ALL events or exercises that an ORO might want to have considered for future exercise credit would have to be sent to the Regional RAC Chair. This is an unnecessary administrative burden for both the OROs and the Regional REP staff.Submission of this request should be part of the exercise design segment of a REP exercise.	Rejected	FEMA disagrees with the suggested change to delete the language regarding the submission window for credit requests.
III.B.5 Exercise Credit	FEMA-2008-0022-0073-060	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-32Comment: Line 19. Credit for Participation in non-REP Exercises. This is a great idea! However, DHS/FEMA has not established national standards for use to award credit. While each RAC Chair should have the latitude to award REP program credit, credit is not currently awarded by RAC Chairs in a uniform manner nationwidePotential Impact: RECOMMENDATION: 1. Establish a set of minimal standards that can be used by the RAC Chairs to base awarding of REP program credit for non-REP exercises. 2. Award REP program credit when ORO's respond to radiological "real life" emergencies.	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0057-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	HSEEP can be beneficial for some, but not all exercises and is more focused on large national type exercises. HSEEP also is based on a 5 year exercise schedule that is based on a build up to full scale exercises every 5 years and is not designed for the frequency of full scale exercises that are required in the REP program. If we were to truly follow HSEEP doctrine we would only be doing full scale exercises every 5 years.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-180	North Carolina Division of Emergency Management, Stephen Payne	”Page III-32, Line 20-23 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“FEMA will also grant exercise credit to OROs for demonstration of REP-specific capabilities in any NEP exercise or drill mandated and/or sponsored by a State or other Federal agency.” BASIS: Demonstration of activities and capabilities that meet criteria or have capabilities applicable to the REP program do not need to have a direct tie to REP to demonstrate these capability.	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. However, non-REP activities may be incorporated into REP exercises. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0051-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The REP exercises are a Tier IV exercise which is the lowest level in the HSEEP matrix and is the integration really worth the impact and cost? HSEEP can be beneficial for some, but not all exercises.	Noted	REP/HSEEP integration complies with Presidential Directives and FEMA Directives. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.5 Exercise Credit	FEMA-2008-0022-0051-005	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The current REP exercise program is more advanced, cost effective, efficient and mature than HSEEP is, and it will be a step backwards to implement REP into HSEEP at this time. The current REP exercise program already has established and clearly defined objectives, tasks to be demonstrated, extent of play agreements, clearly defined evaluation criteria, evaluation process, deficiency identification process, corrective action plan process, corrective action implementation process, and re-demonstration and reevaluation process.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0057-002	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	HSEEP does not bring any true enhancement to the table and creates an unnecessary administrative burden to the program. Our experience with HSEEP at the local level is not favorable for a program that has been in existence for 8 years.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.5 Exercise Credit	FEMA-2008-0022-0051-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The incorporation of REP into HSEEP may have some benefit at the federal level but there is very little value added at the state, local or utility level. HSEEP uses the Target Capabilities List and the Universal Task List as the baseline for exercise development and none of the REP requirements are in the Target Capabilities or Universal Task Lists which HSEEP is based on. The incorporation of the REP requirements into the Target Capabilities List and the Universal Task List needs to be done first to see if they fit before the move into HSEEP is contemplated let alone implemented.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0051-003	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The current HSEEP tool kits are still not fully functional and are difficult to use. HSEEP is very cumbersome to use and requires a lot of administrative input into the system. We have estimated the additional workload for implementing HSEEP into REP, at just the state level, to be 400 hours of additional staff time for a typical REP exercise and 600+ hours for an ingestion exercise. The implementation of HSEEP for REP exercises will also have additional staff implications for the local government as well as the utility.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.
III.B.5 Exercise Credit	FEMA-2008-0022-0051-004	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	With the number of REP drills and exercises we currently do on an annual basis we are estimating that will need one additional FTE in order to implement and use HSEEP as intended. This is more of an unfunded mandate which will require substantial additional resources for implementation in a time when we are constricting the resources available based on the economic conditions.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0020-051	Ashtabula County EMA, George Rolland	Page Ref. Comment: General Question - Who/Which entity is the lead for a HSEEP exercise? Who will develop the package? State? Licensee? Locals? Those persons must be certified by FEMA and they should not be participants and CANNOT be decision makers (which means cannot be the EMA Directors). Comment by: Locals	Noted	The State is the lead entity for REP exercises, unless another ORO is appropriate due to local authority structures. Ideally, members of the planning team should not be players. The trusted agent shall not participate as a decision-maker. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process.
III.B.5 Exercise Credit	FEMA-2008-0022-0021-051	Geauga County DES, Dale Wedge	Page Ref. Comment: General Question - Who/Which entity is the lead for a HSEEP exercise? Who will develop the package? State? Licensee? Locals? Those persons must be certified by FEMA and they should not be participants and CANNOT be decision makers (which means cannot be the EMA Directors). Comment by: Locals	Noted	The State is the lead entity for REP exercises, unless another ORO is appropriate due to local authority structures. Ideally, members of the planning team should not be players. The trusted agent shall not participate as a decision-maker. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process.
III.B.5 Exercise Credit	FEMA-2008-0022-0036-051	Lake County EMA, Larry Greene	Page Ref. Comment: General Question - Who/Which entity is the lead for a HSEEP exercise? Who will develop the package? State? Licensee? Locals? Those persons must be certified by FEMA and they should not be participants and CANNOT be decision makers (which means cannot be the EMA Directors). Comment by: Locals	Noted	The State is the lead entity for REP exercises, unless another ORO is appropriate due to local authority structures. Ideally, members of the planning team should not be players. The trusted agent shall not participate as a decision-maker. Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process.
III.B.5 Exercise Credit	FEMA-2008-0022-0101-077	Florida Division of Emergency Management, Michael Younger	Page III-32, lines 24-29 This section does not clarify if the REP credentialed evaluator must be from FEMA or from the agency seeking credit. If the REP credentialed evaluator must be from FEMA, then this essentially amounts to an outof- sequence demonstration. As such, clarification needs to be provided as to whether it is then subject to the timeline provided for out-of sequence demonstrations (60 days prior to 30 days after the exercise) or the credit request submission guidelines provided for in this section. The submission guidelines need to be verified for consistency with the exercise development timeline found on page III-3	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-181	North Carolina Division of Emergency Management, Stephen Payne	” Page III-32, Line 25-26RECOMMENDATION/COMMENT: DELETE BASIS: As written this statement presupposes that the criterion being requested for credit required corrective actions or improvements. This indicates a predetermined final grade for exercise activity. Such predeterminations have a negative effect on exercise participants.	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0113-182	North Carolina Division of Emergency Management, Stephen Payne	." Page III-32, Line 26-27 RECOMMENDATION/COMMENT: DELETEBASIS: The requirement to have a REP credentialed evaluator at a non-REP exercise to evaluate an activity for POSSIBLE exercise credit places an undue burden on BOTH the exercise developers and the ORO (who at the time of this exercise may not be considering a request for credit).The required documentation required by paragraph 5a should provide the RAC Chair with sufficient information to make this determination.This requirement also places an undue burden on the limited number of credentialed evaluators available to FEMA.	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0113-183	North Carolina Division of Emergency Management, Stephen Payne	.'Page III-32, Line 30-32 & Page iii-33, Line 17 2. RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:"The ORO should submit the request for credit to the appropriate FEMA RAC Chair as part of a REP exercise extent-of-plan discussion. FEMA headquarters should provide specific written confirmation of the request or denial for credit in sufficient time so as not to adversely affect EXPLAN development." BASIS: As written, ALL exercises both State and Federal must be considered a REP exercise due to the requirement for determination 90 days in advance of ANY exercise if an ORO want to have a capacity evaluated for possible future credit. Once again this places an undue burden on BOTH the exercise developers and the ORO (who at the time of this exercise may not be considering a request for credit). This requirement also places an undue burden on the limited number of credentialed evaluators available to FEMA. An additional administrative burden is place on the evaluators and OROs for separate paperwork. What is the value added for all this additional activity?!	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0113-184	North Carolina Division of Emergency Management, Stephen Payne	."Page III-33, Line 4-17 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLLOWS:"An ORO desiring credit for a specific criterion should submit an application for credit to the appropriate State REP Program Manager as part of the Biennial REP Exercise extent-of-play discussion. The application must specify the basis for the credit request and the REP evaluation area criterion for which credit is requested. The application must also contain the appropriate documentation. If approved, the State will forward to the appropriate FEMA Region RAC Chair. The RAC Chair, in consultation with the Region's REP Staff, will adjudicate the ORO's request for credit. Once the determination has been made, the RAC Chair will advise the REP Branch Chief, FEMA headquarters of the determination and provide copies of the request and review documentation. Unless over ruled by the REP Branch Chief, the RAC Chair will issue the ORO an exemption from FEMA evaluation of the criterion for the next REP exercise within 30 days..FEMA will not grant exemption from evaluation of a specific exercise criterion on consecutive biennial REP exercises." BASIS: Determination of credit for exercise activity is more appropriately accomplished at the Region level. The Region REP staff has more knowledge of the conditions and actions of the requesting ORO.	Modified	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0020-045	Ashtabula County EMA, George Rolland	Page Ref. III-33 Comment: Counties believe there should be no limit on how often they should receive credit for an actual event or other exercise. Suggestion: DELETE the "exemption from evaluation of a specific exercise criterion only ONCE during the 6-Year cycle". Comment by: Locals	Rejected	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0021-045	Geauga County DES, Dale Wedge	Page Ref. III-33 Comment: Counties believe there should be no limit on how often they should receive credit for an actual event or other exercise. Suggestion: DELETE the "exemption from evaluation of a specific exercise criterion only ONCE during the 6-Year cycle". Comment by: Locals	Rejected	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.B.5 Exercise Credit	FEMA-2008-0022-0036-045	Lake County EMA, Larry Greene	Page Ref. III-33 Comment: Counties believe there should be no limit on how often they should receive credit for an actual event or other exercise. Suggestion: DELETE the "exemption from evaluation of a specific exercise criterion only ONCE during the 6-Year cycle". Comment by: Locals	Rejected	REP Program Manual guidance for demonstration/evaluation of criteria outside of the biennial exercise has been modified and clarified. See Part III.B - REP Exercise Process. The FEMA regions noted that even if credit were given for a particular criterion through another exercise, the function might still have to be performed during the REP biennial exercise in order to avoid compromising the integrity of communications, decision making, and implementation of protective actions. If OROs would like exercise credit for non-REP activities, they will have to arrange for additional appropriate evaluators.
III.B.5 Exercise Credit	FEMA-2008-0022-0101-078	Florida Division of Emergency Management, Michael Younger	Page III-33, lines 12-15 This statement needs to be clarified as it would appear that if credit is requested for a criterion that is required to be demonstrated every exercise, it would be denied on the basis of it placing the criterion out of compliance with the required demonstration frequency.	Modified	The cited text has been deleted. This paragraph now reads, "FEMA will grant exemption from evaluation of a specific exercise criterion only once during the exercise cycle for the applicable REP exercise. Even when credit is given, the ORO may still have to perform the function at the biennial exercise in order to avoid compromising the integrity of the exercise. This is at the discretion and consideration of the RAC Chair and will be determined in the extent-of-play agreement negotiations." See Part III.B - REP Exercise Process, Section 7 - REP Program Credit for Participipition in Actual Incidents.
III.C Evaluation Areas					
III.C Evaluation Areas	FEMA-2008-0022-0113-185	North Carolina Division of Emergency Management, Stephen Payne	."Page III-34, Line 3-4 RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:". . . FEMA evaluators, other Federal agencies, FEMA contractors, and any State, local, or tribal evaluators certified, accredited and credentialed in accordance with Section IV.I of this manual.BASIS: Section III.5 requires the use of credentialed REP evaluators to provide evaluation of NON-REP exercises. The REP exercises here are the heart of FEMA's ability to provide NRC reasonable assurance that the health and safety of the citizens surrounding the NPP can be safeguarded. For this reason if no other, the evaluators used during a REP exercise, regardless of where they come from should be properly credentialed.	Modified	The REP evaluator credentialing program is under revision and will be integrated into the HSEEP implementation strategy.
III.C Evaluation Areas	FEMA-2008-0022-0108-177	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-34/III-35 Line: 39/1-2 Comment: Will FEMA's "result-oriented approach" where "accomplishing the mission is more important than the steps take to achieve the results," lead the program towards an "end justifies the means" attitude?	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The intent of the cited text is to affirm that successfully protecting the health and safety of the public is more important than following plans/procedures to the letter.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.C Evaluation Areas	FEMA-2008-0022-0080-030	Douglas Fleck	Pages III-34, Line 39 restates FEMA's policy of a results-oriented approach to evaluations. That is excellent. The shift in 2002 from slavish adherence to checklists and instead using a mission accomplishment approach is greatly appreciated and much more constructive.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
III.C Evaluation Areas	FEMA-2008-0022-0080a-029	Pennsylvania Emergency Management Agency, Douglas Fleck	Pages III-34, Line 39 restates FEMA's policy of a results-oriented approach to evaluations. That is excellent. The shift in 2002 from slavish adherence to checklists and instead using a mission accomplishment approach is greatly appreciated and much more constructive.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
III.C Evaluation Areas	FEMA-2008-0022-0108-178	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-35 Line: 5 Comment: Define "periodically."	Modified	Moving forward, the plan is for FEMA to conduct more timely and periodic reviews of REP policies and guidance. The cited text has been deleted. See Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.C Evaluation Areas	FEMA-2008-0022-0080-031	Douglas Fleck	Page III-35, Lines 5 and 6 states that evaluation areas will be periodically reviewed to allow for changes. That is great and would be welcome, but these reviews need to be conducted and changes made in a much timelier manner than they have been in the past. FEMA-REP-14 and FEMA-REP-15 were both published in September 1991. These both remained in effect without being changed for nearly eleven years until the April 2002 new criteria was published. It has now been over seven years and we are just now reviewing another proposed change. While this is an improvement a process still must be developed that makes it easier and quicker to change methodology due to changing times, procedures, and environments. Perhaps if real HSEEP is actually adopted for REP, instead of a modified non-version, the process will become easier. The decade long gaps in updates need to end. We should be at the point where trends in evaluation shortcomings can be identified and stressed in training and evaluations. On the opposite side we should be able to see evaluation areas that have traditionally shown low incidences of poor performance and look at dropping them from evaluation or evaluating them at much longer intervals. To do otherwise is a waste of time and resources and does nothing to enhance the program. Under HSEEP we are expected to thoroughly evaluate exercise performance and concentrate future training and exercises on identified weaknesses – not just continue to do the same evaluation every single time whether there is a need for it or not. We cannot forever hide behind the excuse that a paper regulation forces us to do it this way.	Modified	Moving forward, the plan is for FEMA to conduct more timely and periodic reviews of REP policies and guidance. The cited text has been deleted. See Part III.C - Demonstration Guidance.
III.C Evaluation Areas	FEMA-2008-0022-0100-028	Pennsylvania Emergency Management Agency, Henry Tamanini	Page III-35, Lines 5 and 6 states that evaluation areas will be periodically reviewed to allow for changes. We suggest and support a more timely review of the exercise evaluation areas based upon the analysis of any trends identified by the HSEEP process.	Modified	Moving forward, the plan is for FEMA to conduct more timely and periodic reviews of REP policies and guidance. The cited text has been deleted. See Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.C Evaluation Areas	FEMA-2008-0022-0080a-030	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-35, Lines 5 and 6 states that evaluation areas will be periodically reviewed to allow for changes. That is great and would be welcome, but these reviews need to be conducted and changes made in a much timelier manner than they have been in the past. FEMA-REP-14 and FEMA-REP-15 were both published in September 1991. These both remained in effect without being changed for nearly eleven years until the April 2002 new criteria was published. It has now been over seven years and we are just now reviewing another proposed change. While this is an improvement a process still must be developed that makes it easier and quicker to change methodology due to changing times, procedures, and environments. Perhaps if real HSEEP is actually adopted for REP, instead of a modified non-version, the process will become easier. The decade long gaps in updates need to end. We should be at the point where trends in evaluation shortcomings can be identified and stressed in training and evaluations. On the opposite side we should be able to see evaluation areas that have traditionally shown low incidences of poor performance and look at dropping them from evaluation or evaluating them at much longer intervals. To do otherwise is a waste of time and resources and does nothing to enhance the program. Under HSEEP we are expected to thoroughly evaluate exercise performance and concentrate future training and exercises on identified weaknesses – not just continue to do the same evaluation every single time whether there is a need for it or not. We cannot forever hide behind the excuse that a paper regulation forces us to do it this way.	Modified	Moving forward, the plan is for FEMA to conduct more timely and periodic reviews of REP policies and guidance. The cited text has been deleted. See Part III.C - Demonstration Guidance.
III.C Evaluation Areas	FEMA-2008-0022-0113-190	North Carolina Division of Emergency Management, Stephen Payne	Page III-36, Line 13 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a.1 –The reception center has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees."BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
III.C Evaluation Areas	FEMA-2008-0022-0113-193	North Carolina Division of Emergency Management, Stephen Payne	"Page III-36, Line 13 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a.1 –The reception center has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees."BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.C Evaluation Areas	FEMA-2008-0022-0113-191	North Carolina Division of Emergency Management, Stephen Payne	”Page III-36, Criteria 6-Support Operation/FacilitiesRECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“6.b.1. – The facility/ORO has adequate procedures and resources for monitoring and decontamination of emergency workers and their equipment, including vehicles”BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
III.C Evaluation Areas	FEMA-2008-0022-0113-186	North Carolina Division of Emergency Management, Stephen Payne	”Page III-37 Line 10-11RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a – Monitoring and Decontamination of Evacuees” BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment in one critera.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.
III.C Evaluation Areas	FEMA-2008-0022-0113-187	North Carolina Division of Emergency Management, Stephen Payne	” Page III-37, Line 13-14 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“6.b – Monitoring and Decontamination of Emergency Workers and their Equipment”BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment.	Accepted	The REP Program Manual text has been modified as suggested. See Criterion 6.b.1 in Part III.C - Demonstration Guidance.
III.C Evaluation Areas	FEMA-2008-0022-0113-192	North Carolina Division of Emergency Management, Stephen Payne	”Page III-37, Line 15-16RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Registration and Temporary Care of Evacuees”	Rejected	The original title will remain. The function of registration is evaluated under 6.a.1, regardless of where it occurs.
III.C Evaluation Areas	FEMA-2008-0022-0113-188	North Carolina Division of Emergency Management, Stephen Payne	”Page III-37, Line 15-16 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:“Registration and Temporary Care of Evacuees”	Rejected	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities					
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0113-194	North Carolina Division of Emergency Management, Stephen Payne	),Page III-38, Line 17-18 RECOMMENDATION/COMMENT: DELETEBASIS: As written this give the impression that a designated Incident Command Post and staging area are required as part of the response to an NPP	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0088-008	Anonymous	Page III-38, lines 17-19, Criterion 1.a.1: “Activation of EW, including those associated with the ICS (e.g. incident command post [ICP] and staging area personnel), should be completed in accordance with the plan and/or procedures.” In 67 FR 80, the wording is “Activation of facilities should be completed in accordance with the plan and/or procedures,” without including EWs in the requirement. The addition of EWs to that requirement makes sense, but both are important. The new manual language should state, “Activation of facilities and EWs, including…”	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0117-003	California Emergency Management Agency, Elaine Jennings	Note: the acronym “ICP” should be spelled out in the document.	Modified	The term Incident Command Post (ICP) is first used and defined in Criterion F.1.c. It is also found in Appendix A - Abbreviations and Acronyms Used in the REP Program. The definition of ICP has been added to glossary. See Appendix B - Glossary of REP Terms.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0113-195	North Carolina Division of Emergency Management, Stephen Payne	”Page III-38, Line 20RECOMMENDATION/COMMENT: DELETE	Rejected	This comment is inconsistent with FEMA policy and best practices. The location and contact information for facilities included in the incident command is necessary information for the response.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0121-106	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -38 Line: 22-25 Comments: Can the ICS evaluation portion be granted credit from another exercise or actual incident, if the utility was not a participant in that particular event?	Modified	The cited REP Program Manual language has been modified to state, 'The REP program does not evaluate ICS tactical operations, only coordination among the incident command, the utility, and all appropriate OROs, pursuant to plans/procedures." OROs are not evaluated at REP exercises on NIMS/ICS compliance. OROs are evaluated according to their own plans/procedures. If OROs using ICS would like exercises credit arising from activities during a REP exercise, they will have to make arrangements for appropriate evaluators. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0113-196	North Carolina Division of Emergency Management, Stephen Payne	."Page III-38, Line 22-25RECOMMENDATION/COMMENT: DELETEBASIS:This an evaluation of how well ORO plans & procedures respond to an event at an NPP NOT an evaluation of ICS. ICS is a flexible system to be tailored to the situation and resources available for the response.	Modified	Procedures and training to ensure the safety of responders is established through local plans. The cited REP Program Manual language has been modified to state, 'The REP program does not evaluate ICS tactical operations, only coordination among the incident command, the utility, and all appropriate OROs, pursuant to plans/procedures." OROs are not evaluated at REP exercises on NIMS/ICS compliance. OROs are evaluated according to their own plans/procedures. If OROs using ICS would like exercises credit arising from activities during a REP exercise, they will have to make arrangements for appropriate evaluators. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0113-197	North Carolina Division of Emergency Management, Stephen Payne	."Page III-38, Line 27 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:". . . especially for agencies responding to those facilities located beyond a normal commuting distance from the individual's duty location or residence. Pre-positioning may be negotiated in the extent-of-play agreement for emergency personnel if the response facilities are located in areas where commuting to the facility could adversely effect exercise play." BASIS: Some response facilities are located in crowed municipal areas with insufficient parking for response to not adversely effect exercise play. The personnel can be allowed to be in the building where the response facility is located but not at their response station. Delay in response could be negotiated in the same manner as those for responders to a facility outside the normal commuting distance.	Rejected	The existing text is adequate. All pre-positioning -- including that specified by the commenter -- may be addressed through the Extent of Play Agreement.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0020-046	Ashtabula County EMA, George Rolland	Page Ref. III-38 Comment: Line 29 - suggestion - add OOS to glossary - (out-of-sequence?) Comment by: Locals & State	Accepted	The term "out of sequence" has been added to the glossary as suggested. See Appendix B - Glossary of REP Terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0021-046	Geauga County DES, Dale Wedge	Page Ref. III-38 Comment: Line 29 - suggestion - add OOS to glossary - (out-of-sequence?) Comment by: Locals & State	Accepted	The term "out of sequence" has been added to the glossary as suggested. See Appendix B - Glossary of REP Terms.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0036-046	Lake County EMA, Larry Greene	Page Ref. III-38 Comment: Line 29 - suggestion - add OOS to glossary - (out-of-sequence?) Comment by: Locals & State	Accepted	The term "out of sequence" has been added to the glossary as suggested. See Appendix B - Glossary of REP Terms.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0073-061	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-38Comment: Line 29. Criterion 1.a.1. Recommend adding OOS to glossary - (Out-of-Sequence)Potential Impact: This is a term commonly used in the REP Program. Recommend adding it so that people new to the REP Program understand it.	Accepted	The term "out of sequence" has been added to the glossary as suggested. See Appendix B - Glossary of REP Terms.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0110-052	Alabama Emergency Management Agency, J Frank Price	page III-38, lines 32-38; Section III-39, lines 33-35: The impact at a Level to require State Government to request EMAC or to need to prioritize resources is beyond the scope of the incident of a plant unless long term contamination has occurred. This type item can be credit with actual events that use EMAC and resource prioritizing	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0062-001	Minnesota Homeland Security and Emergency Management, Kevin Leuer	Why are non-radiological response items being included into the radiological emergency preparedness requirements?	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0105-018	Tennessee Emergency Management Agency, Gary Lima	EMAC will not be required unless during a REP event our State is faced with another “Katrina” level disaster to support, or Tennessee has its own major natural disaster. In the unlikelihood that our two (2) power plants have to go to General Emergency at the same time, and with simultaneous hostile actions, then EMAC will become a viable option. FRMAC and MSRAP will be the only outside resource responses that the State will request and those are already planned for – i.e. the post emergency/post plume/ingestion phase. Exercising EMAC is above directional and control, and is an Executive Level function that does not test our plans. Under the 44 CFR – 350 Review it has been understood that our current plans suffice for effective local and state multi-jurisdictional response.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The specific reference to EMAC has been deleted. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See the Explanation section of Evaluation Criterion C.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0117-033	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-38, Line 33 to 34 - Exercises should also address the role of mutual aid and the Emergency Management Assistance Compact (EMAC) in the incident.Comments: The mutual aid process is a normal part of an all-hazards approach to emergency management. It is unnecessary to elaborate on the role of mutual aid for REP incidents. These functions already take place within Local, State, and Federal emergency response.explanation/RecommendatioN: This is a standard activity within all hazards response. No new requirement is necessary. Delete this sentence.	Rejected	Comment is inconsistent with FEMA policy and best practices. Demonstration of mutual aid resources is not a new requirement. While all-hazard mutual aid agreements are implemented on a daily basis, the agreements specific to radiological response are not. Mutual aid agreements can be demonstrated as negotiated in the extent of play.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0128-033	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-38, line 33-34: Exercises should also address the role of mutual aid and the Emergency Management Assistance Compact (EMAC) in the incident.COMMENTs: As this comment refers to sub element 1.a Mobilization, and refers to doing so in a timely manner, mutual aid may be included but EMAC requests are not applicable. The nature of EMAC requests and the variety of response to a request make that inappropriate for this evaluation area.Explanation/recommendation: Replace the existing sentence with “Exercises may also address the role of mutual aid in the incident as appropriate.”	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0085-001	Georgia Environmental Protection Division, Jim Hardeman	The language on page III-38 lines 33-34 recommends that the role of the Emergency Management Assistance Compact (EMAC) and other mutual aid agreements, such as the Southern Mutual Radiological Assistance Plan (SMRAP) be addressed in exercises. The intent of this recommendation, and the manner in which it is to be demonstrated and evaluated, is unclear	Modified	The specific reference to EMAC has been deleted. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0062-002	Minnesota Homeland Security and Emergency Management, Kevin Leuer	Will it now be a requirement for EMAC to participate in REP exercises	Modified	No, it is not required, and the specific reference to EMAC has been deleted. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0074-002	Minnesota Homeland security and Emergency Management, Kevin Leuer	Will it now be a requirement for EMAC to participate in REP exercises	Modified	No, it is not required, and the specific reference to EMAC has been deleted. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0078-103	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-38 Lines 33-36 Will it now be a requirement for EMAC to participate in REP exercises	Modified	No, it is not required, and the specific reference to EMAC has been deleted. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0074-001	Minnesota Homeland security and Emergency Management, Kevin Leuer	Page III-38 Lines 33-36. Why are non-radiological response items being included into the radiological emergency preparedness requirements?	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0078-102	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-38 Lines 33-36 Why are non-radiological response items being included into the radiological emergency preparedness requirements?	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0068-005	Anonymous	C.4 refers to mutual aid and additional resources for HAB (last paragraph in EOP). It should be added to the reference and extent of play for Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.	Accepted	Evaluation Area Criterion 1.a.1 has been amended to include reference to NUREG-0654/FEMA-REP-1 Criterion C.4. See Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0121-107	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -38 Line: 34 Comments: Mentions Emergency Management Assistance Compacts. If agreements like this are in place are the letters of agreement mentioned earlier in the guide necessary?	Modified	The REP Program Manual language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0062-003	Minnesota Homeland Security and Emergency Management, Kevin Leuer	How do we ensure that federal agencies (FBI) participate in the exercises? We have invited federal agencies in the past and they do not participate as requested	Noted	OROs are not responsible for ensuring Federal participation and will not be penalized if a Federal agency does not participate. The FRPCC will actively pursue participation by other Federal agencies in REP exercises. The RAC Chairs will also assist with obtaining Federal participation.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0074-003	Minnesota Homeland security and Emergency Management, Kevin Leuer	How do we ensure that federal agencies (FBI) participate in the exercises? We have invited federal agencies in the past and they do not participate as requested.	Noted	OROs are not responsible for ensuring Federal participation and will not be penalized if a Federal agency does not participate. The FRPCC will actively pursue participation by other Federal agencies in REP exercises. The RAC Chairs will also assist with obtaining Federal participation.
1.a.1 Mobilize Personnel/ Activate Facilities	FEMA-2008-0022-0078-104	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-38 Lines 33-36 How do we ensure that federal agencies (FBI) participate in the exercises? We have invited federal agencies in the past and they do not participate as requested.	Noted	OROs are not responsible for ensuring Federal participation and will not be penalized if a Federal agency does not participate. The FRPCC will actively pursue participation by other Federal agencies in REP exercises. The RAC Chairs will also assist with obtaining Federal participation.
1.c.1 Direction and Control					
1.c.1 Direction and Control	FEMA-2008-0022-0129-045	Wisconsin Emergency Management, Teri Engelhart	Page: III-39, Line: 22+ Comment: References to the use of ICS are mentioned throughout the manual; to maintain consistency, include references to ICS in Sub-element 1.c -- Direction and Control.	Noted	The EOC may or may not be functioning as incident command, depending on the incident and the ORO plans/procedures. ICS compliance is not evaluated during REP exercises.
1.c.1 Direction and Control	FEMA-2008-0022-0078-107	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-39 Lines 33-35 If required, what resources will need to be demonstrated – are the resources the same for both of the above areas or are they different?	Noted	The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.c.1 Direction and Control	FEMA-2008-0022-0078-108	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-39 Lines 33-35 Will this demonstration need to be done through controller inject or some other method – if a different method can be used, it needs to be outline.	Noted	The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.c.1 Direction and Control	FEMA-2008-0022-0078-105	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-39 Lines 33-35 Will this be required or recommended	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
1.c.1 Direction and Control	FEMA-2008-0022-0078-106	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-39 Lines 33-35 Why are non-radiological response items being included into the radiological emergency preparedness requirements?	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
1.c.1 Direction and Control	FEMA-2008-0022-0117-034	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-39, Line 33 to 35 - Leadership should demonstrate the ability to prioritize resource taskings and replace/supplement resources (e.g., through MOUs or other agreements) when faced with competing demands for finite resources.Comments: This was added without any elaboration as to the need. Effective planning and logistics precludes the need for this item. It also appears to informally add a sub-section to the evaluation area which was not the intent of the NUREG criteria.explanation/RecommendatioN: Remove this sentence.	Rejected	The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 1.a.1 in Part III.C - Demonstration Guidance.
1.d.1 Communications Equipment					
1.d.1 Communications Equipment	FEMA-2008-0022-0113-198	North Carolina Division of Emergency Management, Stephen Payne	"Page III-40, Line20-21 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:"All facilities, to include FMTs, should have the capability. . ."BASIS: As written this statement treats the Incident Command System as a separate distinct entity in the response. Where ever the Incident Commander (Incident command) is located is a "facility" be is fixed or mobile should have the capability to communicate with the other entities in the Incident Command structure be they ORO or Utility.	Rejected	The commenter's suggestion is inconsistent with FEMA policy and best practices for any emergency situation. As written in the REP Program Manual, the guidance identifies the need for a primary and backup system for each facility, including mobile/field units.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.e.1 Equipment and Supplies					
1.e.1 Equipment and Supplies	FEMA-2008-0022-0078-113	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-41 Lines 16, 17 Is this recommended or required	Modified	OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance. The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0078-115	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-41 Lines 16, 17 Depending on how this is interoperated by the Region it will require a lot more training.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. Equipment requirements are determined by ORO based on their plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0128-034	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-41, (line 16 – 20):Only those organizations that are part of an ORO's plans and procedures should be provided KI by that ORO. Specialized response teams and federal response teams that by the nature of their activity may be requested to participate in an HAB event at an NPP should take responsibility for all adequate precautions such as body armor, dosimetry, and/or potassium iodide.Explanation/recommendation: Delete lines 16-20	Rejected	The suggested deletion is against FEMA policy and best practices. OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. Equipment requirements are determined by ORO based on their plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.e.1 Equipment and Supplies	FEMA-2008-0022-0078-114	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-41 Lines 16, 17 The utility does not share their MOU's for security events with the state and local jurisdictions that are responsible for providing training, dosimetry and KI, so how could we be responsible for providing this?	Noted	OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. Equipment requirements are determined by ORO based on their plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0122-010	Emergency Management and Homeland Security Division , James Porcello	In reference to Draft REP Manual, page 111-41, lines 16 and 17. Provisions for providing KI and dosimetry to specialized responders, especially if heading onto the plant site, is an issue that has not yet been fully worked out.	Modified	OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. Equipment requirements are determined by ORO based on their plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0097-086	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-41 (line 28-29):COMMENT: Change to: "Sufficient quantities of … direct reading dosimetry…and dosimeter chargers should be available for issuance to all EWs who will be dispatched to perform an ORO mission."BASIS: Some states have misconstrued this to mean they must purchase dosimetry for ALL EWs that exist, rather than those on a shift in the field responding to the event for a specified period of time.	Accepted	The REP Program Manual has been amended as suggested. See the Dosimetry subsection within the Assesment/ Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0116-096	Nuclear Energy Institute, Alex Marion	Part III.C pg III-41 (line 28-29): "Sufficient quantities of … direct reading dosimetry…and dosimeter chargers should be available for issuance to all EWs." Part III.C pg III-41 (line 28-29): Change to: "Sufficient quantities of … direct reading dosimetry…and dosimeter chargers should be available for issuance to all EWs who will be dispatched to perform an ORO mission."Basis: Some states have misconstrued this to mean they must purchase dosimetry for ALL EWs that exist, rather than those on a shift in the field responding to the event for a specified period of time.	Accepted	The REP Program Manual has been amended as suggested.See the Dosimetry subsection within the Assesment/ Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0110-053	Alabama Emergency Management Agency, J Frank Price	page III-41, lines 28-29: Sufficient quantities of Dosimeters should not apply to all EWs just those that are sent to possible contamination areas	Noted	The suggested deletion is against FEMA policy and best practices. OROs and the licensee need to predetermine who will be responsible for KI, equipment, and training. Responsibility should be documented in the plans/procedures. Equipment requirements are determined by ORO based on their plans/procedures. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.e.1 Equipment and Supplies	FEMA-2008-0022-0113-199	North Carolina Division of Emergency Management, Stephen Payne	."Page III-41, Line 37RECOMMENDATION/COMMENT: DELETEBASIS: This is an unnecessary bureaucratic administrative requirement. These documents are reviewed biannually during FEMA Staff Assistance visits.	Noted	Text says "and/or." Annual review is required, but there are several options for satisfying the requirement.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0078-016	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-42 Lines For FMTs, the instruments should be capable of measuring gamma exposure rates and detecting beta radiation. These instruments should be capable of measuring a range of activity and exposure, including radiological protection/exposure control of team members and detection of activity on air sample collection media, consistent with the intended use of the instrument and the ORO's plans and/or procedures. An appropriate radioactive check source should be used to verify proper operational response for each low-range radiation measurement instrument (less than 1R/hr) and for high-range instruments when available. If a source is not available for a high range instrument, a procedure should exist to operationally test the instrument before entering an area where only a high-range instrument can make useful readings. This section defines an operational check for the Field Measuring Teams and seems to require function in a specific operational range and is different then the operational check requirements for Hospitals, Reception Centers and EWD facilities.	Modified	Detailed information on equipment maintenance and operational checks is under Evaluation Criterion H.10. Additional clarification has been added to NUREG Criteria I.8 and K.5.a. See Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
1.e.1 Equipment and Supplies	FEMA-2008-0022-0073-062	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-42Comment: Lines 10-13. Criterion 1.e.1. The paragraph states that a "range of readings" sticker should be affixed to the side of the instrument to indicate the acceptable range of readings for that instrument. Not all instruments have a check source affixed to them. While this may be the preferred method to indicate a properly functioning instrument, there is another option. A check source can be shared between multiple instruments within an assigned "kit." A form can be generated for each instrument that would be filled out upon return from annual calibration. By comparing the range of readings to the check source assigned to the kit, the same function can be accomplished as affixing a range of readings sticker to the instrument.Potential Impact: Requiring a range of readings sticker on all monitoring instruments would place an additional, unnecessary financial burden on State and locals when an acceptable alternative is available that can accomplish the same thing. Recommend modifying the statement to read that a range of readings sticker or another comparable method should be available so that the user can check instrument function to a known source.	Modified	Detailed information on equipment maintenance and operational checks is under Evaluation Criterion H.10. Additional clarification has been added to NUREG Criteria I.8 and K.5.a. See Part II.C - Planning Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0129-046	Wisconsin Emergency Management, Teri Engelhart	Page: III-42, Line: 18 - 22 Comment: Further clarification is needed on whether the intent is to have a calibrated check source or simply an operational check source. The narrative should explain precisely the desired expectation	Modified	Detailed information on equipment maintenance and operational checks is under Evaluation Criterion H.10. Additional clarification has been added to NUREG Criteria I.8 and K.5.a. See Part II.C - Planning Guidance.
1.e.1 Equipment and Supplies	FEMA-2008-0022-0117-035	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-42, Line 24 to 26 - The monitor(s) should conform to the standards set forth in the ContaminationMonitoring Standard for a Portal Monitor Used for Emergency Response, FEMA-REP-21 (March 1995).Comments: The guidance in FEMA-REP-21 may not be adequate for all portal monitors or situations requiring their use. The manufacturers' recommendations should be included as a recommendation for proper operational checks and use.explanation/RecommendatioN: Please add at the end of the sentence "or in accordance with the manufacturer's recommendations."	Modified	FEMA is providing a minimum standard that allows OROs to determine how many monitors would be needed to process the number of evacuees expected within 12 hours. The guidance in the REP Program Manual, combined with the guidance in FEMA-REP-21 provides additional information on factors that should be considered to establish a reasonable estimate of evacuees per hour that can be monitored. See also REP-22 for guidance on monitoring with handheld equipment, as well as the manufacturer's instructions. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.b.1 Protective Action Recommendations					
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0084-001	Georgia Environmental Protection Division, Jim Hardeman	The language on page III-44 lines 26-31 discusses comparison between licensee and ORO offsite consequence models, and recommends that if differences greater than a factor of 10 exist between licensee and ORO dose projections exist, the ORO and licensee should determine the source of these differences. This language appears in the context of an evaluated radiological exercise.This language presents two problems: first, while the recommendation is to both the licensee and the ORO, this language appears in a document used solely to evaluate the capabilities of ORO -- thus placing the burden squarely on the ORO to resolve these differences. Second, the time and place to resolve differences in offsite consequence assessments is NOT during an evaluated exercise, but in a less formal context, such as a consequence assessment drill or similar activity.	Noted	The comment is inconsistent with FEMA policy or best practices. If modeling software programs have a different great than a factor of 10, the OROs need to demonstrate the ability to address this discrepancy. An evaluated exercise is an excellent place to work through this issue, rather than an actual emergency.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0117-036	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-45, Line 1 - OROs should have the capability to make both initial and subsequent PADs. OROs should demonstrate the capability to make initial PADs in a timely manner appropriate to the situation based on information from the licensee……Comments: The term “information” replaced the term “notification” in this sentence. The utility is required to provide an official notification to the OROs and within the official notification the OROs will recive the ECL and EAL with which to make a PAD. The change may be slight but a decision must be based on official notification by the utility.explanation/RecommendatioN: Please replace ‘information’ with ‘notification’.	Rejected	The remainder of the sentence clarifies that PADs may be based not only on ECLs but also on the ORO's assessment of other factors related to the situation.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0113-201	North Carolina Division of Emergency Management, Stephen Payne	."Page III-45, Line 3-6RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:Other situations such as weather, release timing & magnitude), hostile action (both at the NPP and other locations) may pose an undue risk to an evacuation or an evacuation may disrupt the efforts to respond to the hostile action and a revised PAD may be required.BASIS: As written, this statement only looks at events associated with hostile action directed at the NPP as the need for a revised PAD. It also looks at PADs as a predetermined, unchangeable issue. A PAD should always be made using the recommendations from the NPP (PAR) and a situational awareness of other activity that can effect the decision to evacuate or shelter-in-place.	Modified	The cited REP Program Manual sentence has been re-written with language similar to that suggested by the commenter. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0121-108	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -45 Line: 7 thru 10 Comments: Does being a member of EMAC or an Intrastate Emergency Assistance Compact (IMAC) demonstrate this ability? If so, how do you ensure all are properly trained? Is just-in-time training sufficient to demonstrate this capability?	Noted	The REP Program Manual has been amended to include language explaining that government-to-government resource support that is secured through interjurisdictional mutual aid agreements does not require a separate LOA. This requirement is intended to apply to agreements with non-government entities. Demonstration of mutual aid is negotiated in the extent of play. See the Explanation section of NUREG Crtierion A.3 in Part II.C - Planning Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0078-109	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-45 Lines 7, 8 Will this be required or recommended	Modified	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0078-110	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-45 Lines 7, 8 Why are non-radiological response items being included into the radiological emergency preparedness requirements?	Noted	Demonstration of mutual aid resources is not a new requirement. The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0078-111	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-45 Lines 7, 8 If required, what resources will need to be demonstrated – are the resources the same for both of the above areas or are they different?	Modified	The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0078-112	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-45 Lines 7, 8 Will this demonstration need to be done through controller inject or some other method – if a different method can be used, it needs to be outline.	Noted	The REP Program Manual language has been clarified regarding demonstration of mutual aid during exercises and remove the specific reference to EMAC. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0113-202	North Carolina Division of Emergency Management, Stephen Payne	"Page III-45, Line 9RECOMMENDATION/COMMENT: DELETE AND REWORD AS FOLLOWS:". . . utilized to augment NPP site response or providing resources for other key infrastructure response." BASIS: Local response resources are NOT diverted to augment the NPP response. They are assigned as needed to respond to reported events in their response area.	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0083-002	Georgia Environmental Protection Division, Jim Hardeman	The language on page III-45 lines 15-16 regarding the capability to change protective actions based on accident conditions would appear to require that REP exercise scenarios include conditions which would warrant PAR/PAD changes after an initial protective action decision. Such a requirement would appear to be counter to the stated goal of making REP exercises less predictable.	Noted	This is a reflection of guidance related to more realistic exercise - in real life, multiple PARs could be needed. It allows for more flexibility in scenario development.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0110-054	Alabama Emergency Management Agency, J Frank Price	page III-45, lines 23-25: Since true ICS is not used in REP, PADS cannot be coordinated with Incident Commander	Noted	Some PADs are coordinated through Incident Command.
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0117-037	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-45, Line 24 to 25 - In addition, decisions should be coordinated with incident commandComments: All decisions should be communicated to the incident command for implementation. Coordination and input from the incident command and others will have taken place prior to the decision. explanation/RecommendatioN: Please change this line to read "In addition, decisions should be communicated with the incident command for implementation."	Modified	REP Program Manual language has been modified to state, "If more than one ORO is involved in decision-making, all appropriate OROs should communicate and coordinate PADs with each other. In addition, decisions should be coordinated/communicated with incident command." See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.b.1 Protective Action Recommendations	FEMA-2008-0022-0128-035	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-45, (line 24 – 25 Decisions are the purview of decision makers. The decision should be communicated to the incident command for the incident command to begin implementing the decision. Coordination and input from the incident command and others will have taken place prior to the decision no further coordination is necessary. Explanation/recommendation: Please change this line to read “In addition, decisions should be communicated with the incident command.	Modified	REP Program Manual language has been modified to state, "If more than one ORO is involved in decision-making, all appropriate OROs should communicate and coordinate PADs with each other. In addition, decisions should be coordinated/communicated with incident command." See Assessment/Extent of Play section of Criterion 2.b.2 in Part III.C - Demonstration Guidance.
2.c Protective Action Decisions					
2.c Protective Action Decisions	FEMA-2008-0022-0090-010	York County Office of Emergency Management, James Welty	Page III-45, Lines 32-36: Remove the words “and unlicensed” before “daycare centers.”	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c Protective Action Decisions	FEMA-2008-0022-0020-047	Ashtabula County EMA, George Rolland	Page Ref. III-45 Comment: Line 35 - Delete 'unlicensed' day cares - impossible to know all of the unlicensed day cares. Potential Impact: There is no mechanism to know of all the unlicensed day cares in a county/EPZ. Unlicensed means they do not have to report to anyone and can open, close, move at will. Comment by: Locals	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c Protective Action Decisions	FEMA-2008-0022-0021-047	Geauga County DES, Dale Wedge	Page Ref. III-45 Comment: Line 35 - Delete 'unlicensed' day cares - impossible to know all of the unlicensed day cares. Potential Impact: There is no mechanism to know of all the unlicensed day cares in a county/EPZ. Unlicensed means they do not have to report to anyone and can open, close, move at will. Comment by: Locals	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.c Protective Action Decisions	FEMA-2008-0022-0036-047	Lake County EMA, Larry Greene	Page Ref. III-45 Comment: Line 35 - Delete 'unlicensed' day cares - impossible to know all of the unlicensed day cares. Potential Impact: There is no mechanism to know of all the unlicensed day cares in a county/EPZ. Unlicensed means they do not have to report to anyone and can open, close, move at will. Comment by: Locals	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B).
2.c Protective Action Decisions	FEMA-2008-0022-0073-063	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-45Comment: Line 35. Criterion 2.b.2. recommend deleting 'unlicensed' day cares. It is impossible to know all of the unlicensed daycares.Potential Impact: This is an unreasonable expectation to place on a jurisdiction. There is no mechanism to know of all the unlicensed day cares in a county/EPZ. Unlicensed means they do not have to report to anyone and can open, close, move at will.	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c Protective Action Decisions	FEMA-2008-0022-0110-055	Alabama Emergency Management Agency, J Frank Price	page III-45, line 35; identifying unlicensed daycare is an improbable task. This type of daycare most often is not identified and unless they fill out special needs request remains unknown.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c Protective Action Decisions	FEMA-2008-0022-0109-042	Ottawa County, Ohio, Koch Beth	page III-45, line 35: "…schools, licensed and unlicensed daycare centers, mobility-impaired individuals, and…"COMMENT - Delete the reference to "unlicensed daycare centers." Identification of all unlicensed daycare centers is not possible. Remove "unlicensed".	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.c Protective Action Decisions	FEMA-2008-0022-0113-203	North Carolina Division of Emergency Management, Stephen Payne	."Page III-45, Line 35 RECOMMENDATION/COMMENT: DELETE AND REWORD AS FOLLOWS:". . . licensed daycare centers. . ."BASIS: Locating, recording and tracking of unlicensed daycare centers places an unrealistic expectation and undue burden on the local emergency agencies. As these locations are unlicensed, there is no requirement for the daycare location to report it's existence.	Accepted	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. (See Intent section of Sub-element 2.c in Part III.C Demonstration Guidance). Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare Centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c Protective Action Decisions	FEMA-2008-0022-0121-109	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -45 Line: 35 Comments: Mentions unlicensed daycare centers as a special population. If they are unlicensed how would we be aware of their existence in order to give them special attention/consideration? Seems that this would fall under the general public.	Modified	The REP Program Manual has been amended to delete references to planning for unlicensed daycare centers. Exempt and/or unlicensed daycare facilities not participating in the REP program should be considered part of the general population for planning purposes (See Daycare centers subsection within the Explanation Section of Evaluation Criterion J.10.d in Part II.C - Planning Guidance). The glossary definition for "daycare center" has been amended (See Appendix B - Glossary of REP Terms).
2.c.1 Pads for Special Populations					
2.c.1 Pads for Special Populations	FEMA-2008-0022-0113-204	North Carolina Division of Emergency Management, Stephen Payne	.Page III- 46, Line 9-10RECOMMENDATION/COMMENT: DELETEBASIS: As written, this implies the incident command is some function separate from where the decision makers are located.	Rejected	FEMA disagrees with the proposed deletion. Incident command is not a fixed location, but rather an organizational element responsible for management of an incident.
2.c.1 Pads for Special Populations	FEMA-2008-0022-0113-205	North Carolina Division of Emergency Management, Stephen Payne	."Page III-46, Line 14-15RECOMMENDATION/COMMENT: DELETEBASIS: This is an unnecessary requirement. If desired contact with public school systems/districts may be actual or simulated, as agreed to in the extent of play. Some contacts should be actual, as negotiated in the extent of play. All actual and simulated contacts should be logged.	Rejected	The comment is inconsistent with FEMA policy or best practices. Some actual contacts are required to demonstrate that communications function properly. Actual and simulated contacts are negotiated in the site-specific extent of play agreement.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
2.c.1 Pads for Special Populations	FEMA-2008-0022-0113-206	North Carolina Division of Emergency Management, Stephen Payne	)."Page III-46, Line 16-22RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:"In accordance with plans and/or procedures, local officials should demonstrate the capability to make prompt decisions on protective actions for students. Officials should demonstrate that the decision-making process considers (that is, either accepts automatically or gives weight to) PARs given by the Utility, the ECL at which these recommendations are received, preplanned strategies for protective actions at a specific ECL, and the location of students at the time (e.g., for example, whether the students are still at home, en route to school, or at school)."BASIS: As written, this can be interpreted that school officials can make different PADs from those determined by the officials in charge of the situation. Such actions create confusion and misunderstanding of the actions to be taken in an emergency.	Modified	The term "local officials" is too broad; the existing language reflects the fact that, depending on local authority structures, the school officials may have autonomy to make PADs for students. The utility may not be communicating directly with school officials. The REP Program Manual language has been amended to state "The decision making process, including any preplanned strategies for protective actions for that ECL, must consider the location of students at the time (e.g., whether the students are still at home, en route to school, or at school)." See Assessment/Extent of Play section of Criterion 2.c.1 in Part III.C - Demonstration Guidance.
2.e.1 Relocation /Re-Entry/Return Decisions					
2.e.1 Relocation/ Re-Entry/Return Decisions	FEMA-2008-0022-0129-047	Wisconsin Emergency Management, Teri Engelhart	Page: III-48, Line: 5 - 12 Comment: The definition of "relocation" includes both the general public who have not been previously evacuated, and those who have been evacuated. ORO plans and procedures may be sufficient (i.e. conservative) enough that additional relocations may not be necessary beyond the evacuated area. The draft guidance, as written, forces exercise designers to create an artificial "hot spot" in order to drive the relocation activities. Furthermore, basing relocation decisions on projected dose is premature. Relocation is not an urgent activity.	Noted	The comment does not contain any specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. The existing text does not require additional evacuations if they are not needed.
2.e.1 Relocation/ Re-Entry/Return Decisions	FEMA-2008-0022-0093-028	Texas Department of State Health Services, Bob Free	Page III-48, Line 13, Criterion 2.e.1, Extent of Play, Reentry General Comment: There is no discussion of considerations for Hostile Action Based Drills. There is a strong possibility that reentry decisions will be impacted by a hostile action event. Such events may require reentry decisions that are very different from reentry considerations for accident scenarios.	Noted	Re-entry occurs during the intermediate phase of a radiological incident. The Hostile Action portion of the incident would be over before re-entry occurs.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.a.1 EW Exposure Control					
3.a.1 EW Exposure Control	FEMA-2008-0022-0082-001	Georgia Environmental Protection Division, Jim Hardeman	The language in pages III-50 line 41 through page III-51 line 4 appears to impose dosimetry (direct reading and permanent) requirements on emergency workers at EOCs and communications centers. It should be noted that some EOCs and communications centers are located at substantial distances from the affected facility (for example, the Georgia State Operations Center in Atlanta, GA, which also contains the state's 24-hour warning point, is more than 100 miles away from any of the facilities at which response would be required). Is the intent here to impose dosimetry requirements on these remote facilities? If this is not the intent, FEMA should provide guidance as to the distance from the affected facility at which direct reading and/or permanent dosimetry would not be required.	Modified	FEMA cannot provide a distance that will apply in every situation. The cited REP Program Manual language refers to low-exposure areas, not remote locations. The REP Program Manual language does not require that dosimetry be used at facilities where there is virtually no chance of exposure from the NPP site incident. The cited REP Program Manual has been amended to read, "Emergency workers assigned to low-exposure rate areas (e.g., EOCs and communications center with the EPZ, reception centers, and counting laboratories)..." See Assessment/Extent of Play section of Criterion 3.a.1 in Part III.C - Demonstration Guidance. Also see glossary entry for Emergency Worker in Appendix B - Glossary of REP Terms.
3.a.1 EW Exposure Control	FEMA-2008-0022-0113-207	North Carolina Division of Emergency Management, Stephen Payne	Page III-51, Line 9 RECOMMENDATION/COMMENT: REWRITE AS FOLLOWS: “administrative limits lower. . .”BASIS: Use of the descriptive term “considerably” in describing an OROs administrative limits is subjective and editorial in nature and not necessary in this document.	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 3.a.1 in Part III.C - Demonstration Guidance.
3.b.1 KI Decision Implementation					
3.b.1 KI Decision Implementation	FEMA-2008-0022-0113-208	North Carolina Division of Emergency Management, Stephen Payne	)Page III-51, Line 31-32RECOMMENDATION/COMMENT: DELETEBASIS;This statement is redundant and indicates that additional emergency worker resources used in an event are considered different for initial response emergency workers. Irregardless of were the emergency worker is from, plans for providing personal protective equipment appropriate for the situation are applicable.	Modified	All demonstration information for EWs has been moved to Criterion 3.a.1. The cited REP Program Manual text has been deleted. See Criterion 3.a.1 in Part III.C - Demonstration Guidance.
3.b.1 KI Decision Implementation	FEMA-2008-0022-0121-110	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III-51 Line: 34-36 Comments: Does this include schools? They're not mentioned here. (see next item, III.C, III-52, Line 32)	Noted	Schools are addressed under distribution of KI to the general public. Provisions for KI distribution are specific to an ORO's plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.b.1 KI Decision Implementation	FEMA-2008-0022-0097-087	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	pg III-51 (line 37-38): COMMENT: Change to: "For evaluation purposes, the actual ingestion of KI shall not be performed."	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 3.a.1 in Part III.C - Demonstration Guidance.
3.b.1 KI Decision Implementation	FEMA-2008-0022-0116-097	Nuclear Energy Institute, Alex Marion	Part III.C Sub-element 3.b pg III-51 (line 37-38): "For evaluation purposes, the actual ingestion of KI is not necessary."Part III.C Sub-element 3.b pg III-51 (line 37-38): Change to: "For evaluation purposes, the actual ingestion of KI shall not be performed."	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 3.a.1 in Part III.C - Demonstration Guidance.
3.c.2 PADS for Schools					
3.c.2 PADS for Schools	FEMA-2008-0022-0121-111	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III-52 Line: 32 Comments: Does this include KI? It is not mentioned here. (see previous item, III.C, III-51, Lines 34-36)	Noted	Schools are addressed under distribution of KI to the general public. Provisions for KI distribution are specific to an ORO's plans/procedures.
3.c.2 PADS for Schools	FEMA-2008-0022-0110-056	Alabama Emergency Management Agency, J Frank Price	page III-52, lines 33-34: Can be accomplished during school in session must be simulated when not	Noted	Demonstration of school evacuation is negotiated in the site-specific extent of play agreement.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.c.2 PADS for Schools	FEMA-2008-0022-0080-032	Douglas Fleck	Page III-52, Lines 33-34 state that at least one school in each affected school district should demonstrate per exercise. This is an excellent idea, but should be clarified by saying that only one school per school district has to demonstrate. In Pennsylvania only the school districts have a plan. The individual schools do not. They follow the district all-hazards plan. In FEMA Region III there is an insistence that every single school affected by an EPZ be evaluated every six years. To provide an example – in the Three Mile Island EPZ there are currently ninety schools that have students that would be affected by an event at the plant. In order to meet the present FEMA requirement this would entail sending evaluators to thirty schools for each biennial exercise during a 6-year cycle. There is very little gained by checking all of these schools except to confirm that they are following the district plan and where they store their KI, if applicable. School accountability, dismissal, and transportation are handled as they would for any other event. This insistence that every single school be evaluated every six years is an expensive endeavor. As explained above, during the 2009 Three Mile Island exercise thirty-one schools had to have evaluators. These evaluators were flown in from all over the country and provided lodging, per diem, and a rental car for four-plus days to spend 10-15 minutes asking a school principal a series of canned questions that could have been done telephonically if they had even been necessary in the first place. Again, most every question can be answered during the school district evaluation. All of their schools respond the same way. In an era of shrinking resources we do not have the luxury evaluating redundantly.	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified to state "Each school system/district within the 10 mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/district must participate in the demonstration." See Assessment/Extent of Play section of Criterion 3.c.2 in Part III.C - Demonstration Guidance. Also, see the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.c.2 PADS for Schools	FEMA-2008-0022-0080a-031	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-52, Lines 33-34 state that at least one school in each affected school district should demonstrate per exercise. This is an excellent idea, but should be clarified by saying that only one school per school district has to demonstrate. In Pennsylvania only the school districts have a plan. The individual schools do not. They follow the district all-hazards plan. In FEMA Region III there is an insistence that every single school affected by an EPZ be evaluated every six years. To provide an example – in the Three Mile Island EPZ there are currently ninety schools that have students that would be affected by an event at the plant. In order to meet the present FEMA requirement this would entail sending evaluators to thirty schools for each biennial exercise during a 6-year cycle. There is very little gained by checking all of these schools except to confirm that they are following the district plan and where they store their KI, if applicable. School accountability, dismissal, and transportation are handled as they would for any other event. This insistence that every single school be evaluated every six years is an expensive endeavor. As explained above, during the 2009 Three Mile Island exercise thirty-one schools had to have evaluators. These evaluators were flown in from all over the country and provided lodging, per diem, and a rental car for four-plus days to spend 10-15 minutes asking a school principal a series of canned questions that could have been done telephonically if they had even been necessary in the first place. Again, most every question can be answered during the school district evaluation. All of their schools respond the same way. In an era of shrinking resources we do not have the luxury evaluating redundantly.	Modified	The intention is for each school district to be evaluated in a 6-year period. REP Program Manual language has been clarified to state "Each school system/district within the 10 mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/district must participate in the demonstration." See Assessment/Extent of Play section of Criterion 3.c.2 in Part III.C - Demonstration Guidance. Also, see the modified footnote for Demostration Criterion 3.c.2 in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements.
3.c.2 PADS for Schools	FEMA-2008-0022-0100-029	Pennsylvania Emergency Management Agency, Henry Tamanini	As a component of the “Extent of Play for Sub-element 3.c.2 “School Officials implement protective actions for schools”, Page III-53, Line 4 states that a bus driver (and the bus driver’s escort if applicable) should be available in addition to as an example “schools’ superintendent/principals and transportation director/bus dispatchers) superintendent, during an interview of appropriate school personnel to demonstrate knowledge of their role in the evacuation of school children. Werecommend that the “bus driver” be removed from the required list of “appropriate school personnel including decision making officials” since in most instances in Pennsylvania the drivers are not employees of the school system but instead are employed by a contracted bus transportation vendor. We suggest that the inclusion of the transportation director is sufficient.	Rejected	Bus drivers may be considered emergency workers depending on local practices. It is important to verify that bus drivers have and understand the information required to perform their duty. The specifics of arranging for bus drivers vary across the country and are described in ORO's plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.c.2 PADS for Schools	FEMA-2008-0022-0080-033	Douglas Fleck	Page III-53, Line 4 states that a bus driver should be available during an evaluation. This is another waste that needs deleted. Bus drivers evacuating students during a nuclear power plant event do absolutely nothing different from what they do for any other evacuation or normal dismissal. They wait for students to load the bus and then safely drive them to their destinations. There is nothing REP unique to evaluate. Outside the Beltway most bus drivers are part time and actually work at other jobs or go home when not driving the school bus. To call them in for an evaluation would require them to miss time at their other jobs and cause the school district to pay overtime to them. Again, there is nothing gained by having them there. The school district or principal can answer any transportation questions.	Rejected	Bus drivers may be considered emergency workers depending on local practices. It is important to verify that bus drivers have and understand the information required to perform their duty. The specifics of arranging for bus drivers vary across the country and are described in ORO's plans/procedures.
3.c.2 PADS for Schools	FEMA-2008-0022-0080a-032	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-53, Line 4 states that a bus driver should be available during an evaluation. This is another waste that needs deleted. Bus drivers evacuating students during a nuclear power plant event do absolutely nothing different from what they do for any other evacuation or normal dismissal. They wait for students to load the bus and then safely drive them to their destinations. There is nothing REP unique to evaluate. Outside the Beltway most bus drivers are part time and actually work at other jobs or go home when not driving the school bus. To call them in for an evaluation would require them to miss time at their other jobs and cause the school district to pay overtime to them. Again, there is nothing gained by having them there. The school district or principal can answer any transportation questions.	Rejected	Bus drivers may be considered emergency workers depending on local practices. It is important to verify that bus drivers have and understand the information required to perform their duty. The specifics of arranging for bus drivers vary across the country and are described in ORO's plans/procedures.
3.c.2 PADS for Schools	FEMA-2008-0022-0110-057	Alabama Emergency Management Agency, J Frank Price	page III-53, line 8-13; Public schools have the resources to develop and provide timely information but, private schools (Church) and daycares do not and simple communication plans for coordinating with the County EOC should be adequate for demonstration.	Noted	All facilities responsible for children should have a plan for timely emergency communications. The responsible ORO coordinates with these facilities.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.d.1 Traffic and Access Control					
3.d.1 Traffic and Access Control	FEMA-2008-0022-0113-209	North Carolina Division of Emergency Management, Stephen Payne	."Page III-53, Line 27 RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:"OROs should demonstrate . . ."BASIS:As written this gives the impression that the EOC is an ORO not a location+. Incident command is a FUNCTION not a LOCATION. As part of the Incident Command System it is modified to meet the requirements the event or situation at hand. It is not in a fixed location but can be moved to where the command of the situation needs to be.	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 3.d.1 in Part III.C - Demonstration Guidance.
3.d.1 Traffic and Access Control	FEMA-2008-0022-0110-058	Alabama Emergency Management Agency, J Frank Price	page III-53, line 33-35; "verifying emergency worker identification" cannot always be done at traffic control points. They can check for identification and can be aware of individuals allowed into affected areas, but without an approved consistent id program cannot verify.	Noted	Verification is done according to ORO plans/procedures.
3.e.2 Information and Pads for Ingestion					
3.e.2 Information and Pads for Ingestion	FEMA-2008-0022-0078-116	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-55 Lines 5-17 The previous REP manual contains specific language regarding the (Ingestion Planning Zone) IPZ. This language appears to be missing from this version of the REP manual.	Noted	NUREG-0654/FEMA-REP-1 and 44 CFR Part 350 use the term "ingestion exposure pathway emergency planning zone." This term is synonymous with "ingestion planning zone (IPZ)" and "50-mile EPZ." The REP Program Manual is using the term ingestion exposure pathway emergency planning zone for consistency with NUREG-0654/FEMA-REP-1.
3.e.2 Information and Pads for Ingestion	FEMA-2008-0022-0129-043	Wisconsin Emergency Management, Teri Engelhart	Page: III-55, Line: 11 - 12 Comment: The use of "commercial sectors" is confusing because of the strong usage of the word "sectors" in the REP context. It is suggested that a word other than "sectors" be used, such as "commercial segments".	Rejected	The existing REP Program Manual language is appropriate. The term "commercial sectors" is consistent with use in other DHS programs (e.g., the critical infrastructure protection program refers to specific "sectors").

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.f.1 Relocation, Reentry, and Return					
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0113-210	North Carolina Division of Emergency Management, Stephen Payne	."Page III-55, Lone 32-33 RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:"OROs should demonstrate the capability to coordinate and implement decisions concerning relocation of individuals now located in radiologically contaminated areas that were not previously evacuated. . . ."BASIS:Rewording clarifies the fact that the relocation of individuals is for health and safety reasons not just because they were not part of the original evacuations.	Modified	REP Program Manual language modified to read, "…individuals located in radiologically contaminated areas that were not previously evacuated." See Assessment/Extent of Play section of Criterion 3.f.1 in Part III.C - Demonstration Guidance.
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0110-059	Alabama Emergency Management Agency, J Frank Price	page III-55, line 35-37; OROs cannot demonstrate "long-term" relocation of evaluates only short term.	Noted	Demonstration is through discussion of planning provisions.
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0078-117	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-55 Line 37 The term "second" is not accurate. More accurate is "subsequent year"	Rejected	The cited REP Program Manual text will remain unchanged. The use of the term "second" is consistent with the current edition of EPA 400.
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0078-118	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-55 Line 37 The new EPA 400 manual and FRMAC no longer recognize the 50-year PAG	Noted	The new EPA 400 is still in draft form. The REP Program Manual will be amended as appropriate once the EPA 400 revision is finalized.
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0121-112	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III-55 Line: 37 Comments: Mentions first, second and 50 year PAGs. Is this terminoloqv beinq modified or eliminated?	Noted	The new EPA 400 is still in draft form. The REP Program Manual will be amended as appropriate once the EPA 400 revision is finalized.
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0113-211	North Carolina Division of Emergency Management, Stephen Payne	."Page III-55, Line 38-39RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:"Areas of consideration should include the capability of OROs to coordinate the . . ."BASIS:As written, this section implies but never specifies who is to communicate with the OROs on the specified items.	Modified	The REP Program Manual has been modified to read, "Areas of consideration should include the capability of OROs to communicate with other OROs…" See Assessment/Extent of Play section of Criterion 3.f.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
3.f.1 Relocation, Reentry, and Return	FEMA-2008-0022-0113-212	North Carolina Division of Emergency Management, Stephen Payne	."Page III-56 , Line 21-22 RECOMMENDATION/COMMENT: DELETEBASIS:As written this sentence is directed at individuals that have been RELOCATED not allowed to RETURN to their homes. This should be deleted or relocated to a paragraph concerning relocation.	Modified	The REP Program Manual language has been amended to move the reference to intermediate-term housing for relocated persons to the paragraph discussing relocation. See Assessment/Extent of Play section of Criterion 3.f.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]					
4.a.1 [Reserved]	FEMA-2008-0022-0078-120	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-57 Line 15 In the previous version of the REP Manual Criterion 4.a.1 read: The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates Was this criterion moved to a different section, removed by mistake or is it no longer required to demonstrate this?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0073-064	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-57Comment: Line 15. Criterion 4.a.1. The old criterion discussed the field team equipment used to complete their prescribed mission and the adequacy of that equipment. The draft REPP Manual removes this requirement. We assume that this has been incorporated into Evaluation Area 1. We feel that this criterion should remain in the new REPP Manual rather than being incorporated into Evaluation Area 1. Potential Impact: The use of Evaluation Area 4 for everything involving field measurement and analysis is a logical step. This area is very specialized and it makes sense to keep it all together rather than moving part of it into another Evaluation Area. Recommend keeping the field team equipment requirement in evaluation Area 4.	Rejected	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0101-079	Florida Division of Emergency Management, Michael Younger	Page III-57, line 15 It is unclear why this criterion is marked reserved. The following is taken from the Federal Register published on April 25, 2002: Criterion 4.a.1: The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates. (NUREG–0654, H.10; I.7, 8, 9).	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0121-099	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: II -141 Line: 11 Comments: Criteria 4.a.1 is marked as "RESERVED" on page III-57. Will the public be able to comment on this item before it is filled in and similar items throughout the document?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
4.a.1 [Reserved]	FEMA-2008-0022-0020-048	Ashtabula County EMA, George Rolland	Page Ref. III-57 Comment: Line 15 - Why is Criterion 4.a.1 (RESERVED)?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0021-048	Geauga County DES, Dale Wedge	Page Ref. III-57 Comment: Line 15 - Why is Criterion 4.a.1 (RESERVED)?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0036-048	Lake County EMA, Larry Greene	Page Ref. III-57 Comment: Line 15 - Why is Criterion 4.a.1 (RESERVED)?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0078-119	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-57 Line 15 Criterion 4.a.1: [RESERVED] Comment: Page III-57 Line 15 Why is this Criterion now marked as "RESERVED?"	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.1 [Reserved]	FEMA-2008-0022-0054-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	Page III-57 Line15 Criterion 4.a.2 (Reserved)The previous language in Criterion 4.a.2 for measuring direct exposure in air was deleted and that section is now listed as (RESERVED). Does this mean that the previous requirements are no longer required and have been intentionally deleted?	Noted	The requirements in Exercise Area Criterion 4.a.1, field survey equipment, have been moved under Exercise Area Criterion 1.e.1, equipment and supplies. These demonstrations are still required. Criterion 4.a.1 is being maintained as a placeholder for future use. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.
4.a.2 Field Team Manageme nt					
4.a.2 Field Team Manageme nt	FEMA-2008-0022-0113-213	North Carolina Division of Emergency Management, Stephen Payne	Page III-57, Line 16 RECOMMENDATION/COMMENT: DELETEBASIS:The number of field teams to be to be managed should be as negotiated upon in the extent-of-play agreement.	Rejected	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
4.a.2 Field Team Management	FEMA-2008-0022-0113-215	North Carolina Division of Emergency Management, Stephen Payne	Page III-57, Line 16 RECOMMENDATION/COMMENT: DELETEBASIS:The number of field teams to be to be managed should be as negotiated upon in the extent-of-play agreement.	Rejected	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.
4.a.2 Field Team Management	FEMA-2008-0022-0081-001	Georgia Environmental Protection Division, Jim Hardeman	Page III-57 line 16 improperly cites the REP Exercise Methodology (66 FR 47526 et seq.) by inserting the parenthetical phrase "(2 or more").	Noted	In accordance with HSPD-5 and other National Preparedness Systems, the objective is to align the REP Program Manual and Supplement 4 with NIMS standards as much as possible. Supplement 4 and the revised REP Program Manual are being released concurrently. Any changes to Supplement 4 prior to finalization will be reflected in the REP Program Manual.
4.a.2 Field Team Management	FEMA-2008-0022-0093-029	Texas Department of State Health Services, Bob Free	Page III-57, Line 19, Criterion 4.a.2, Extent of Play General Comment: It appears the discussion of Hostile Action Based considerations should apply in part to Reentry, especially regarding coordination with Incident Command.	Noted	Re-entry refers to the intermediate phase of a radiological incident. The Hostile Action portion of the incident would be over before re-entry occurs.
4.a.2 Field Team Management	FEMA-2008-0022-0078-121	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-57 Line 21-23 Field monitoring teams need to also be coordinated through the EOCs as well as incident command.	Modified	The chain of command in an HAB incident is situation-dependent. The intent is to ensure that incident command is aware of the location of field teams relative to the unsafe areas. Activities are conducted according to plans/procedures. The cited REP Program Manual language has been amended to read, "During an HAB incident, the Field Team management should keep the incident command informed of field monitoring teams' activities and location." See Assessment/Extent of Play section of Criterion 4.a.2 in Part III.C - Demonstration Guidance.
4.a.2 Field Team Management	FEMA-2008-0022-0122-011	Emergency Management and Homeland Security Division , James Porcello	page III-57, lines 21-23. Field monitoring teams need to also be coordinated through the EOCs as well as incident command.	Modified	The chain of command in an HAB incident is situation-dependent. The intent is to ensure that incident command is aware of the location of field teams relative to the unsafe areas. Activities are conducted according to plans/procedures. The cited REP Program Manual language has been amended to read, "During an HAB incident, the Field Team management should keep the incident command informed of field monitoring teams' activities and location." See Assessment/Extent of Play section of Criterion 4.a.2 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
4.a.2 Field Team Management	FEMA-2008-0022-0113-214	North Carolina Division of Emergency Management, Stephen Payne	."Page III-57, Line 22-23RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:"During a hostile action event, the deployment of field monitoring teams (utility and ORO) should be coordinated with the responding law enforcement command element."BASIS: Coordination of field monitoring team deployment in a hostile action event with the responding law enforcement command element is essential for safety of the monitoring teams. As written this is an assumption not a basis of fact.	Modified	The chain of command in an HAB incident is situation-dependent. The intent is to ensure that incident command is aware of the location of field teams relative to the unsafe areas. Activities are conducted according to plans/procedures. The cited REP Program Manual language has been amended to read, "During an HAB incident, the Field Team management should keep the incident command informed of field monitoring teams' activities and location." See Assessment/Extent of Play section of Criterion 4.a.2 in Part III.C - Demonstration Guidance.
4.a.3 Field Monitoring					
4.a.3 Field Monitoring	FEMA-2008-0022-0117-038	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-58, Line 10 and Part IIIC, page III-59, Line 1 – "Two or more"Comments: The establishing of two or more field teams is not the intent of this evaluation area. This is an addition to the evaluation area and not the intent of the evaluation. A single team can demonstrate adequately the abilities of FMTs for this evaluation area. This places an unjustified burden for OROs to demonstrate during evaluations.explanation/RecommendatioN: Remove from both locations "two or more".	Rejected	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.
4.a.3 Field Monitoring	FEMA-2008-0022-0113-216	North Carolina Division of Emergency Management, Stephen Payne	Page III-59, Line 1 RECOMMENDATION/COMMENT: DELETEBASIS:The number of field teams to be to be managed should be as negotiated upon in the extent-of-play agreement.	Rejected	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.
4.a.3 Field Monitoring	FEMA-2008-0022-0081-002	Georgia Environmental Protection Division, Jim Hardeman	Page III-59 line 1 improperly cites the REP Exercise Methodology (66 FR 47526 et seq.) by inserting the parenthetical phrase "(2 or more").	Noted	A minimum of 2 field teams must be demonstrated; however, more may be negotiated in the extent of play agreement.
4.a.3 Field Monitoring	FEMA-2008-0022-0113-217	North Carolina Division of Emergency Management, Stephen Payne	)"Page III-59, Lines 11, 32 & 36RECOMMENDATION/COMMENT: DELETE RETURN TO ORIGINAL WORDINGBASIS: As written, this implies that OROs should have multiple laboratories for inspection during an evaluation. Maintenance of multiple laboratories by State, Local or Tribal OROs is not cost effective. It is noted that "Analysis may require resources beyond those of the ORO."	Rejected	The existing language is adequate and does not require multiple laboratories, but rather provides flexibility for the option of having more than one laboratory.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
4.a.3 Field Monitoring	FEMA-2008-0022-0073-065	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-59Comment: Lines 12-14. Criterion 4.b.1. The paragraph discusses Field Teams taking agricultural samples. State law requires that milk samples be taken by State Agricultural Food Safety Officers only. Recommend adding the following sentence, "It is acceptable for non-Field Team members to take agricultural samples' if State law requires so."Potential Impact: State law requires milk samples be taken by Washington State Department of Agriculture Food Safety Officers only.Comment By: State	Modified	The cited REP Program Manual text has been amended to read, "The field teams and/or other sampling personnel…" See Assessment/Extent of Play section of Criterion 4.b.1 in Part III.C - Demonstration Guidance.
4.a.3 Field Monitoring	FEMA-2008-0022-0129-048	Wisconsin Emergency Management, Teri Engelhart	Page: III-61, Line: 19 - 20 Comment: Activation of the primary alerting/notification system. The phrase "with a sense of urgency and without undue delay" is inconsistent with previous sections of this document which references the "15 minute guideline." As written, it indicates there is no 15 minute requirement. Maintain clear and consistent timeline requirements throughout the document	Modified	The explanation for Evaluation Criterion E.6 has been amended to better clarify the difference between design objectives - what the system is capable of when time is of the essence - and implementation expectations under incident conditions that are not escalating rapidly. The initial alert and notification design objective is 15 minutes from the time the decision makers receive notification. The initial alert and notification design objective for exception areas is 45 minutes. In non-rapidly-escalating incidents, initial alert and notification is expected "in a timely manner" (with a sense of urgency and without undue delay). If there is a failure in the primary alert and notification system, backup alert and notification should be conducted "within a reasonable time," with a recommended goal of 45 minutes from the time the ORO becomes aware of the primary failure. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
5.a.3 Backup Alert and Notificatio n					
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0108-206	Louisiana Department of Environmenta l Quality, Cheryl Chubb	Page 13 - V.a - What is considered the "best effort that may be made by the OROs?"	Modified	The term "best effort" has been removed. See NUREG-0654/FEMA-REP-1 Supplement 4, Part E. Backup Means for Alert and Notification Systems.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0078-122	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-62 Lines 30-33 What is meant by “Although circumstances may not allow this for all facilities” what facilities is it recommended for?	Modified	The goal of 45 minutes applies to all facilities. However, the guidance is acknowledging that geographical considerations or specifics of the incident may make 45 minutes an unrealistic goal for a particular situation. The cited sentence has been modified to state, "Although circumstances may not allow this for all situations, FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plume exposure EPZ within a reasonable time of failure of the primary alert and notification system, with a recommended goal of 45 minutes." See Assessment/Extent of Play section of Criterion 5.a.3 in Part III.C - Demonstration Guidance.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0078-123	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-62 Lines 30-33 Exactly when does the clock start measuring the 45 minute interval?	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0078-124	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-62 Lines 30-33 How strictly will this time limit be enforced - is 45 minutes and one second too long? If so, then the exact start time of the clock becomes very important.	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0110-060	Alabama Emergency Management Agency, J Frank Price	page III-62, line 32-33; difference in time requirements on route alerting. Page 61 says route alerting when used a the primary means “will not be subject to specific time requirements” and in the 5.a.3 criterion backup alert is to be completed in a “reasonable time” but on page 62 lines 32 and 33 it says FEMA and NRC recommends “establish backup means that will reach those in the plume exposure EPZ within 45 minutes of failure of the primary alert and notification system.” The difference between “reasonable” and “within 45 minutes” and could involve considerable resources.	Noted	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0080-034	Douglas Fleck	Page III-62, Line 33 states 45 minutes should be the goal of completing backup route alerting. Recommend this be changed to read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 45 minutes, if possible.” Clarifying the start time as “failure of the primary alert and notification system” is a good idea that should standardize evaluations through all FEMA regions.	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0080a-033	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-62, Line 33 states 45 minutes should be the goal of completing backup route alerting. Recommend this be changed to read “initial alert and notification should be conducted as timely as possible with no unnecessary delays and with a goal of 45 minutes, if possible.” Clarifying the start time as “failure of the primary alert and notification system” is a good idea that should standardize evaluations through all FEMA regions.	Modified	Backup alerting should be completed "within a reasonable time" of the ORO becoming aware of the failure of the primary ANS considering topography, population density, existing ORO resources and timing. The "within 45 minutes" cited in Criterion 5.a.3 is an implementation goal, not a demonstration time limit. The explanation under Criterion E.6 has been amended to explain this more clearly. See the Design Objectives for Alert and Notification of the Public subsection within the Explanation section of Evaluation Criterion E.6 in Part II.C - Planning Guidance.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0020-049	Ashtabula County EMA, George Rolland	Page Ref. III-62 Comment: Is a back-up to the siren system needed independent of 'back-up route alerting'?	Noted	Backup route alerting is an acceptable backup to the siren system as long as it can provide coverage of essentially 100% of the population in the event the primary method is unavailable.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0021-049	Geauga County DES, Dale Wedge	Page Ref. III-62 Comment: Is a back-up to the siren system needed independent of 'back-up route alerting'?	Noted	Backup route alerting is an acceptable backup to the siren system as long as it can provide coverage of essentially 100% of the population in the event the primary method is unavailable.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0036-049	Lake County EMA, Larry Greene	Page Ref. III-62 Comment: Is a back-up to the siren system needed independent of 'back-up route alerting'?	Noted	Backup route alerting is an acceptable backup to the siren system as long as it can provide coverage of essentially 100% of the population in the event the primary method is unavailable.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0078-126	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-62 Lines 34, 35 Is this required or recommended?	Modified	Demonstration of backup alert and notification is required per the guidelines in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise, Exercise Cycle Requirements.The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
5.a.3 Backup Alert and Notification	FEMA-2008-0022-0078-125	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page III-62 Lines 34, 35 Define what is meant by “as appropriate.”	Modified	The cited REP Program Manual text has been amended for clarity and now reads, "If backup route alerting is demonstrated, only one route needs to be selected and demonstrated." See Assessment/Extent of Play section of Criterion 5.a.3 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
5.a.4 Exception Area Alerting					
5.a.4 Exception Area Alerting	FEMA-2008-0022-0078-127	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-63 Line 17 Is this recommended or required?	Modified	Demonstration of backup alert and notification is required per the guidelines in Exhibit III-2: Federal Evaluation Process Matrix in Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise, Exercise Cycle Requirements.The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
5.b.1 Public Information During Emergency					
5.b.1 Public Information During Emergency	FEMA-2008-0022-0110-061	Alabama Emergency Management Agency, J Frank Price	page III-65, lines 7-9: ORO's are having difficulty receiving info for Security issues and demonstrating will be a problem.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
5.b.1 Public Information During Emergency	FEMA-2008-0022-0113-218	North Carolina Division of Emergency Management, Stephen Payne	."Page III-65, Line 9 RECOMMENDATION/COMMENT: DELETE AND REWRITE AS FOLLOWS:". . . should be coordinated with appropriate security authorities e.g. law enforcement and NPP security agencies." BASIS: Security activity for an NPP is a combination of law enforcement agencies, local, State and Federal in combination with the NPP security force. As written this statement could be interpreted as coordination is only with law enforcement agencies. NPP security forces are not law enforcement agencies but are an integral part of the overall security for the NPP.	Accepted	The REP Program Manual has been amended as suggested. See Assesment/ Extent of Play section of Criterion 5.b.1 in Part III.C - Demonstration Guidance.
6.a Monitoring, Decontamination, Registration					
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219a	North Carolina Division of Emergency Management, Stephen Payne	.Page III-66 - 70RECOMMENDATION/COMMENT: DELETE ALL ABOVE & REWORD AS FOLLOWS:Sub-element 6.a – Monitoring, Decontamination and Recording of EvacueesIntentThis sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that OROs have the capability to implement radiological monitoring and decontamination of evacuees, while minimizing contamination of the facility. OROs should also have the capability to identify and register evacuees as monitored and decontaminated (if necessary) at reception centers.Criterion 6.a.1: The reception center/emergency worker facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and record of actions by evacuees. (NUREG-0654/FEMA-REP-1, J.10.h; J.12; K.5.a)Extent of playRadiological monitoring, decontamination, and registration facilities for evacuees, including service animals and household pets, where applicable, should be set up and demonstrated as they would be in an actual emergency or as indicated in the extent-of-play agreement. This would include adequate space for evacuees' vehicles. Organizations demonstrating this Criterion should have the resources (e.g., monitoring	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219b	North Carolina Division of Emergency Management, Stephen Payne	(continued)teams/portal monitors) to monitor 20 percent of the population within a 12-hour period. Availability of recourses can be demonstrated with documentation (e.g. MOU/MOA, Recall/Realignment Procedures) to show how necessary equipment would be provided to the location. Before using monitoring instrument(s), the monitor(s) should demonstrate the process of checking the instrument(s) for proper operation.Staff responsible for the radiological monitoring of evacuees should demonstrate the capability to attain and sustain, within 12 hours, a monitoring productivity rate per hour needed to monitor the 20 percent EPZ population planning base. The monitoring productivity rate per hour is the number of evacuees (including service animals and household pets, where applicable) that can be monitored, per hour, by the total complement of monitors using an appropriate procedure. For demonstration of monitoring, decontamination capabilities, and recording, minimum of six individuals, not to include Emergency Workers, should be monitored using equipment and procedures specified in the plan and/or procedures. The monitoring sequences for the first six simulated evacuees		
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219c	North Carolina Division of Emergency Management, Stephen Payne	(continued)per monitoring team will be timed by the evaluators to determine whether the 12-hour requirement can be met. Decontamination of evacuees may be simulated and conducted by interview. Provisions for separately showering should be demonstrated or explained. The staff should demonstrate provisions for limiting the spread of contamination. Provisions could include floor coverings, signs, and appropriate means (for example, partitions, roped-off areas) to separate uncontaminated from potentially contaminated areas. Provisions should also exist to separate contaminated and uncontaminated individuals, service animals, and household pets, where applicable; provide changes of clothing for those with contaminated clothing; and store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. In addition, for any individual, service animal, or household pet found to be contaminated, procedures should be discussed concerning handling of potential contamination of vehicles and personal belongings. Waste water from decontamination operations does not need to be collected.Monitoring personnel should explain the action		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219d	North Carolina Division of Emergency Management, Stephen Payne	(continued) levels for determining the need for decontamination. They should also explain the procedures for referring any evacuees who cannot be adequately decontaminated for assessment and follow-up in accordance with the ORO's plans and/or procedures. Contamination of the individual(s) will be determined by controller inject and not simulated with any low-level radiation source.OROs should demonstrate the capability to identify individuals, vehicles, service animals, and household pets upon completion of the monitoring and decontamination activities. All activities associated with this criterion should be based on the ORO's plans and/or procedures and completed as they would be in an actual emergency, unless otherwise indicated in the extent-of-play agreement. The activities for recording radiological monitoring, and decontamination if necessary, should include establishing an individual evacuee record consisting of the individual's name, address, service animal or household pet information, results of monitoring, and time of decontamination, if any, or as otherwise designated in the plan and/or procedures. Audio recorders, camcorders, or written records are all		
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219e	North Carolina Division of Emergency Management, Stephen Payne	(continued) acceptable means for recording this information.Sub-element 6.b – Monitoring and Decontamination of Emergency Workers and their Vehicles and EquipmentIntentThis sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that OROs have the capability to implement radiological monitoring and decontamination of emergency workers and their equipment to include vehicles.Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of emergency worker vehicles and equipment. (NUREG-0654/FEMA-REP-1, K.5.b)Extent of playThe monitoring staff should demonstrate the capability to monitor EW personnel and equipment, to include vehicles, for contamination in accordance with the ORO's plans and/or procedures. Specific attention should be given to equipment, including any vehicles, that were in contact with contamination. The monitoring staff should demonstrate the capability to make decisions on the need for decontamination of personnel and equipment, including vehicles, based on guidance levels and procedures stated in the ORO plans and/or procedures.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219f	North Carolina Division of Emergency Management, Stephen Payne	(continued)Monitoring of EWs does not have to meet the 12-hour requirement. However, appropriate monitoring procedures should be demonstrated for a minimum of two EWs and their equipment, including vehiclesThe area to be used for monitoring and decontamination should be set up as it would be in an actual emergency, with all route markings, instrumentation, record keeping, and contamination control measures in place. Monitoring procedures should be demonstrated for a minimum of one vehicle. It is generally not necessary to monitor the entire surface of vehicles. However, the capability to monitor areas such as radiator grills, bumpers, wheel wells, tires, and door handles should be demonstrated. Interior surfaces of vehicles that were in contact with contaminated individuals should also be checked.Decontamination of EWs may be simulated and conducted by interview. Provisions for separately showering should be demonstrated or explained. The staff should demonstrate provisions for limiting the spread of contamination. Provisions could include floor coverings, signs, and appropriate means (for example, partitions, roped-off areas) to separate uncontaminated from potentially		
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219g	North Carolina Division of Emergency Management, Stephen Payne	(continued)contaminated areas. Provisions should also exist to separate contaminated and uncontaminated individuals, where applicable; provide changes of clothing for those with contaminated clothing; and store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. Decontamination capabilities, and provisions for vehicles and equipment that cannot be successfully decontaminated, may be simulated and conducted by interview. Waste water from decontamination operations does not need to be collected. All activities associated with this criterion should be based on the ORO's plans and/or procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent-of-play agreement.Sub-element 6.c – Registration and Temporary Care of EvacueesIntentThis sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that OROs demonstrate the capability to establish relocation centers in host areas. The American Red Cross (ARC) normally provides congregate care in support of OROs under existing letters of agreement.Criterion 6.c.1: Managers of congregate care		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219h	North Carolina Division of Emergency Management, Stephen Payne	(continued)facilities demonstrate that the centers have resources to provide service, to include evacuee registration, and accommodations consistent with American Red Cross planning guidelines. (American Red Cross Disaster Services Program Guidance, Sheltering Handbook, May 2008). Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities. (NUREG-0654/FEMA-REP-1, J.10.h, J.12)Extent of playUnder this criterion, demonstration of congregate care centers may be conducted as an Out-of-Sequence (OOS) activity within the exercise scenario. The evaluator should conduct a walk-through of the center to determine, through observation and inquiries, that the services and accommodations are consistent with ARC Sheltering Handbook.[1] (For planning purposes, OROs are required to plan for a sufficient number of congregate care centers in host areas to accommodate a minimum of 20 percent of the EPZ population[2]). In this simulation, it is not necessary to set up operations as they would be in an actual emergency.		

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-219i	North Carolina Division of Emergency Management, Stephen Payne	(continued)Alternatively, capabilities may be demonstrated by setting up stations for various services and providing those services to simulated evacuees, service animals, and household pets, where applicable. Given the substantial differences between demonstration and simulation of this criterion, exercise demonstration expectations should be clearly specified in extent-of-play agreements.Congregate care staff should also demonstrate the capability to ensure that evacuees, service animals, household pets (where applicable), and vehicles have been monitored for contamination, decontaminated, as appropriate, before entering the facility. This capability may be determined through an interview process. If operations at the center are demonstrated, material that would be difficult or expensive to transport (e.g., cots, blankets, sundries, animal crates (where applicable), and large-scale food supplies) need not be physically available at the facility(ies). However, availability of such items should be verified by providing the evaluator a list of sources with locations and estimates of quantities.All activities associated with this criterion should be based on the ORO's plans and/or procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent-of-play agreement.BASIS: Realignment of criteria separates evacuee activity, monitoring, decontamination, registration & sheltering and emergency workers with their equipment into easily understood criteria.		
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0113-189	North Carolina Division of Emergency Management, Stephen Payne	"Page III-64 Line 23 RECOMMENDATION/COMMENT: REWORD AS FOLLOWS:6.a – Monitoring and Decontamination of Evacuees"BASIS: Transfer requirement for monitoring and decontamination of Emergency Workers to Criterion 6.b. This move consolidates all activity associated with emergency workers and their equipment in one critera.	Modified	Criteria 6.a.1 and 6.b.1 have been amended to put demonstration requirements related to evacuees in 6.a.1 and EWs in 6.b.1. See Demostration Criteria 6.a.1. and 6.b.1 in Part III.C - Exercise Demostration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a Monitoring, Decontamination, Registration	FEMA-2008-0022-0073-067	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-66Comment: Lines 12-14 and Line 24. Criterion 6.a. What does "where applicable" mean when speaking of household pets? Does this refer only to EWAC locations that process pets or in those instances when any person arrives at any EWAC with a pet?Potential Impact: Causes confusion as to what the actual requirement is. Recommend providing additional clarification as to what the term refers to.Comment By: State/Locals	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring /Decontamination of Evacuees and EWs, Registration of Evacuees					
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0080-035	Douglas Fleck	Page III-66, Lines 17 and 18 require having one-third of the resources available at a monitoring/decontamination site. This requirement needs to be changed to only require sufficient personnel and equipment to be on hand to demonstrate the proper monitoring of six individuals. In Pennsylvania the majority of those scheduled to work at these facilities are volunteers. Nothing is served by having all or one-third of them report to the evaluation. A roster identifying the whole contingent should suffice. This is exactly how the capability to demonstrate a complete shift change has been done for emergency operation centers. Likewise, it makes no sense to drag all or one-third of the monitoring/decontamination equipment to the evaluation site. Not only is it manpower and vehicle intensive, but it also increases the risk of damage or loss. If emergency workers can successfully set up and use one piece of equipment logic indicates that they are also capable of doing the same with two or three pieces of the same equipment. Having enough equipment at the evaluation site to handle the six simulated victims should be sufficient. Verifying that an agency possesses sufficient quantities of equipment and material to handle the full 20% of evacuees can be confirmed by checking inventory sheets. That is already how you verify leak tests on DRDs. You don't perform a leak test on every DRD during an evaluation – rather you check the paperwork to confirm it was done.	Noted	FEMA is maintaining the established policy of demonstration of 1/3 of monitoring resources. The commenter's suggestion has been noted for future consideration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0080a-034	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-66, Lines 17 and 18 require having one-third of the resources available at a monitoring/decontamination site. This requirement needs to be changed to only require sufficient personnel and equipment to be on hand to demonstrate the proper monitoring of six individuals. In Pennsylvania the majority of those scheduled to work at these facilities are volunteers. Nothing is served by having all or one-third of them report to the evaluation. A roster identifying the whole contingent should suffice. This is exactly how the capability to demonstrate a complete shift change has been done for emergency operation centers. Likewise, it makes no sense to drag all or one-third of the monitoring/decontamination equipment to the evaluation site. Not only is it manpower and vehicle intensive, but it also increases the risk of damage or loss. If emergency workers can successfully set up and use one piece of equipment logic indicates that they are also capable of doing the same with two or three pieces of the same equipment. Having enough equipment at the evaluation site to handle the six simulated victims should be sufficient. Verifying that an agency possesses sufficient quantities of equipment and material to handle the full 20% of evacuees can be confirmed by checking inventory sheets. That is already how you verify leak tests on DRDs. You don't perform a leak test on every DRD during an evaluation – rather you check the paperwork to confirm it was done.	Noted	FEMA is maintaining the established policy of demonstration of 1/3 of monitoring resources. The commenter's suggestion has been noted for future consideration.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0122-008	Emergency Management and Homeland Security Division , James Porcello	It would be a mistake for FEMA to set portal monitoring rates. There are a lot of things that will influence the rate at which people can be monitored. For example, after a contaminated person triggers the portal monitor, the procedure calls for mopping the area and scanning with a CDV-700 prior to anyone else passing through the portal. How long will that take? Is that included in the monitoring rate? These and many more questions will be raised. We feel that as long as 20% of the population monitored in 24 hours can be demonstrated, no further requirements are needed.	Noted	FEMA is providing a minimum standard that allows OROs to determine how many monitors would be needed to process the number of evacuees expected within 12 hours. The guidance in the REP Program Manual, combined with the guidance in FEMA-REP-21 provides additional information on factors that should be considered to establish a reasonable estimate of evacuees per hour that can be monitored. See also REP-22 for guidance on monitoring with handheld equipment, as well as the manufacturer's instructions. See Assessment/Extent of Play section of Criterion 1.e.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0073-068	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-66Comment: Lines 23-30. Criterion 6.a. The paragraph discusses the inclusion of service animals and household pets into the monitoring productivity rate calculations. There is no commercially available pet/service animal monitoring equipment other than a handheld instrument. The process of monitoring with a handheld instrument is slow and laborious even with cooperating people. The guidance says that the productivity rate is to be calculated using 6 people/service animals/pets. The inclusion of pets/service animals in the calculation will not provide an accurate rate based on the limited number of data points. Recommend excluding pets/service animals or substantially increase the sample data in order to get a more realistic monitoring rate.Potential Impact: Including pets and service animals in the monitoring productivity rate severely lowers the rating and hampers the ability of the jurisdiction to meet the objective.Comment By: State/Locals	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0020-050	Ashtabula County EMA, George Rolland	Page Ref. III-66 Comment: line 24 - Once again, what does "where applicable" mean when speaking of household pets? Comment by: Locals	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0021-050	Geauga County DES, Dale Wedge	Page Ref. III-66 Comment: line 24 - Once again, what does "where applicable" mean when speaking of household pets? Comment by: Locals	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0036-050	Lake County EMA, Larry Greene	Page Ref. III-66 Comment: line 24 - Once again, what does "where applicable" mean when speaking of household pets? Comment by: Locals	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0080-036	Douglas Fleck	Page III-66, Line 24 includes in household pets in the number of evacuees that can be monitored in a 12-hour period. As stated earlier in this document (Paragraph 14) trying to count pets will greatly skew this 20% estimation. There is simply no way to accurately estimate how many pets are in an EPZ and what type. Furthermore, human beings are always going to take precedence over pets. Eventually we will figure out ways to have “clean” owners do a supervised monitoring and decontamination of their pets using equipment situated nearby. Until this is worked out it would be premature to develop a federal requirement to include pets in the number of evacuees. For now this requirement needs to be dropped.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0080a-035	Pennsylvania Emergency Management Agency, Douglas Fleck	Page III-66, Line 24 includes in household pets in the number of evacuees that can be monitored in a 12-hour period. As stated earlier in this document (Paragraph 14) trying to count pets will greatly skew this 20% estimation. There is simply no way to accurately estimate how many pets are in an EPZ and what type. Furthermore, human beings are always going to take precedence over pets. Eventually we will figure out ways to have “clean” owners do a supervised monitoring and decontamination of their pets using equipment situated nearby. Until this is worked out it would be premature to develop a federal requirement to include pets in the number of evacuees. For now this requirement needs to be dropped.	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0128-036	San Luis Obispo County Office of Emergency Services , Ron Alsop	page III-66 to 70, et alRemove all references to Household pets.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0117-039	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Part IIIC, page III-66 to 70, et alComments: See prior comments for section Part IIC, J.12, page II-102.Remove all references to Household pets.explanation/RecommendatioN: Remove all references to Household pets.	Rejected	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0073-069	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: III-67Comment: Lines 1-2. Criterion 6.a. The sentence states that waste water from decontamination operations does not need to be collected. During previous evaluated exercises, some comments surfaced that questioned the collection of waste water. There was much discussion as to whether the US EPA considered that hazardous waste. It would be very helpful to be able to have a reference document from the US EPA that states that they do not consider decontamination waste water to be hazardous waste.Potential Impact: There is a conflict between what the USEPA says is hazardous waste and what is stated in the draft REPP Manual.Comment By: State/Locals	Noted	The recommendation that waste water from decontamination operations does not need to be collected is FEMA policy and applies to all REP monitoring/decontamination facilities. See "FEMA Policy Statement on Disposal of Waste Water and Contaminated Products from Decontamination Activities, January 1989". A footnote referencing this memo has also been added to the end of the cited sentence. Waste water from decontamination operations is handled according to the OROs plans/procedures. See the Contamination Control subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.a.1 Monitoring/ Decontamination of Evacuees and EWs, Registration of Evacuees	FEMA-2008-0022-0121-113	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III-67 Line: 3 thru 6 Comments: Mentions procedures for referring people who can't be decontaminated for assessment/care. What about pets/service animals that are mentioned earlier in the document? If they can't be decontaminated, what do you do?	Modified	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
6.b.1 Monitoring /Decontamination of EW Vehicles and Equipment					
6.b.1 Monitoring/ Decontamination of EW Vehicles and Equipment	FEMA-2008-0022-0110-062	Alabama Emergency Management Agency, J Frank Price	page III-68, lines2-3. Collecting waste water from decontamination is cover in local plans per local rules	Noted	The recommendation that waste water from decontamination operations does not need to be collected is FEMA policy and applies to all REP monitoring/decontamination facilities. See "FEMA Policy Statement on Disposal of Waste Water and Contaminated Products from Decontamination Activities, January 1989". A footnote referencing this memo has also been added to the end of the cited sentence. Waste water from decontamination operations is handled according to the OROs plans/procedures. See the Contamination Control subsection within the Explanation section of Evaluation Criterion J.12 in Part II.C - Planning Guidance.
6.b.1 Monitoring/ Decontamination of EW Vehicles and Equipment	FEMA-2008-0022-0093-025	Texas Department of State Health Services, Bob Free	Page III-68 Sub-element 6.c – Temporary Care of Evacuees Criterion 6.c.1 This part requires managers of congregate care facilities to operate the centers consistent with the American Red Cross sheltering handbook (American Red Cross Disaster Services Program Guidance, Sheltering Handbook, May, 2008). This document is not generally available to planners involved in REP. FEMA should coordinate with American Red Cross to provide more information on the ARC sheltering handbook. This sub element should provide more specific information FEMA desires for congregate care.	Accepted	FEMA acknowledges changes in Mass Care protocols and has modified REP Program Manual references to the ARC Sheltering Handbook. FEMA shelter guidance is under development. See Assesment/ Extent of Play section of Criterion 6.c.1 in Part III.C - Demonstration Guidance.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
6.c Temporary Care of Evacuees					
6.c Temporary Care of Evacuees	FEMA-2008-0022-0078-128	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-68 Whole section beginning with Line 7 There was no language regarding facilities managed by the American Red Cross will be evaluated once when designated or when substantial changes occur. This language occurs in the previous REP Manual (August 2002) as footnote g in TABLE 7 on page III-229. There appears to be no similar table or language in the REP Manual currently under revision.	Noted	The cited reference in the 2010 REP Program Manual is located in Table III-2, Federal Evaluation Process Matrix.
6.c.1 Congregate Care Centers					
6.c.1 Congregate Care Centers	FEMA-2008-0022-0078-129	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page III-68 Lines 26-28 Is this recommended or required - specifically the household pets?	Noted	The REP Program Manual has been revised to remove specific requirements to plan for household pets. The REP Program Manual does contain general guidelines for expanding ORO plans/procedures in response to the recent regulatory changes regarding service animals. Plans/procedures should reflect how a jurisdiction will provide care to service animals, including the identification of resources it has or can readily obtain through existing mutual aid agreements. Although provisions for household pets are not currently required, FEMA encourages OROs to plan for the reality that in an emergency, many evacuees will arrive at reception centers with their pets. FEMA guidance on planning for monitoring and decontamination of household pets is under development and will be incorporated into the REP Program Manual when appropriate. See Part I.C, Section 4: Special Information Regarding Service Animals and Household Pets.
III.D Evaluation of Medical Services Drills					
III.D Evaluation of Medical Services Drills	FEMA-2008-0022-0113-220	North Carolina Division of Emergency Management, Stephen Payne	”Page III-71, Lines 11 / 18 / 26 / 37 RECOMMENDATION/COMMENT: DELETE & REWORD AS: “medical”BASIS:The term “EMS” – Emergency Medical Service refers to the initial emergency response by paramedics and emergency medical technicians. MS-1 drills are intended to evaluate the full range to include medical facility i.e. hospital and staff (Physicians & nursing staff). See line 22-23.	Accepted	The REP Program Manual has been amended as suggested. See Part III.D Evaluation of Medical Services Drill.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III.D Evaluation of Medical Services Drills	FEMA-2008-0022-0108-180	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: III-71 Line: 23-25 Comment: Does the "contaminated injured" need to be varied during demonstrations as noted by the three FEMA definitions.	Noted	The objective is to demonstrate monitoring and contamination control during transport. The REP Program Manual language in N.2.c has been clarified. Glossary entry has also been amended.
III.D Evaluation of Medical Services Drills	FEMA-2008-0022-0121-114	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III -71 Line: 23-25 Comments: Why is point #3 "contaminated and injured"? They may be injured because of the exposure, but they are not contaminated. This may cause confusion and delay of treatment, if medical personnel are not clear on the status of a particular patient.	Noted	If the individual has exposure injuries but is not contaminated, special transportation is not required.
III.D Evaluation of Medical Services Drills	FEMA-2008-0022-0121-115	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: III-71 Line: 27 Comments: Mentions havinq one trained physician and nurse for MS-1 activities. Is a physician assistant acceptable?	Noted	This is determined in ORO plans/procedures.
Part IV. Program Administration					
IV. Program Administration	FEMA-2008-0022-0111-030	Illinois Emergency Management Agency, Andrew Velasquez	FEMA is to be commended from adding this section as it does bring together several administrative practices in one reference.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
IV.B Regulatory Summary					
IV.B Regulatory Summary	FEMA-2008-0022-0080-037	Douglas Fleck	Page IV-2 explains the basis for 44CFR part 350 approval of state and local REP plans. This raises the question of just what the advantage is to even going through the grueling, labor intensive process of spending years arguing with FEMA, dotting the "i" and crossing the "t" on reams of plans. What exactly does a state or local government gain from such a major effort? If the past is any indication once your plans are granted the mythical 350 approval there seems to be no further review. In Pennsylvania our state REP plan and the plans for the municipalities included in the Susquehanna Steam and Electric Station EPZ were granted 350 approval in 1998 after a multi-year effort. Since that approval there have been numerous substantive changes to all of these plans. It seems that once you get 350 approval the only thing necessary to keep it is to participate in biennial exercises and submit an Annual Letter of Certification. It would be interesting to know how many plans have ever had their 350 approval revoked because of later FEMA review. It is also interesting to note that the EPZ cited above is the only one of the five EPZs in Pennsylvania that has 350 approval. The other four have never sought nor been granted 350 approval yet they are graded the same way, to the same standards, and qualitatively have roughly the same outcomes as the one EPZ with 350 approval. This has been this way since the REP program began in this state. Again there appears to be no advantage and therefore no motivation for entities to seek 350 approval.	Noted	A 350 approval process allows a State to move beyond interim approval status and demonstrates to the public that a site has met specific planning and preparedness criteria. According to NUREG and FEMA policy, plans must be submitted annually or certification that plan review has been completed.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
IV.B Regulatory Summary	FEMA-2008-0022-0080a-036	Pennsylvania Emergency Management Agency, Douglas Fleck	Page IV-2 explains the basis for 44CFR part 350 approval of state and local REP plans. This raises the question of just what the advantage is to even going through the grueling, labor intensive process of spending years arguing with FEMA, dotting the "i" and crossing the "t" on reams of plans. What exactly does a state or local government gain from such a major effort? If the past is any indication once your plans are granted the mythical 350 approval there seems to be no further review. In Pennsylvania our state REP plan and the plans for the municipalities included in the Susquehanna Steam and Electric Station EPZ were granted 350 approval in 1998 after a multi-year effort. Since that approval there have been numerous substantive changes to all of these plans. It seems that once you get 350 approval the only thing necessary to keep it is to participate in biennial exercises and submit an Annual Letter of Certification. It would be interesting to know how many plans have ever had their 350 approval revoked because of later FEMA review. It is also interesting to note that the EPZ cited above is the only one of the five EPZs in Pennsylvania that has 350 approval. The other four have never sought nor been granted 350 approval yet they are graded the same way, to the same standards, and qualitatively have roughly the same outcomes as the one EPZ with 350 approval. This has been this way since the REP program began in this state. Again there appears to be no advantage and therefore no motivation for entities to seek 350 approval.	Noted	A 350 approval process allows a State to move beyond interim approval status and demonstrates to the public that a site has met specific planning and preparedness criteria. According to NUREG and FEMA policy, plans must be submitted annually or certification that plan review has been completed.
44 CFR 350 - Initial Plan Review					
44 CFR 350 - Initial Plan Review	FEMA-2008-0022-0097-088	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	page IV-3, lines 8 and 9:COMMENT: This sentence shortcuts the process described in greater detail in the paragraph that immediately precedes it, and could be interpreted as providing inconsistent policy. Recommend it be deletedBASIS: The prior paragraph, beginning on line 32 of page IV-2, provides a detailed explanation of the FEMA plan review and approval process and the subsequent sentence on lines 8 and 9 of page IV-3 adds nothing but potential confusion.	Accepted	The cited text has been deleted. See Part IV. B Regulatory Summary, Section 1.b 44 CFR Part 350 – Review and Approval of State and Local Radiological Emergency Plans, Overview of Requirements and Procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
44 CFR 350 - Initial Plan Review	FEMA-2008-0022-0116-098	Nuclear Energy Institute, Alex Marion	Part IV.B.1.1.1, page IV-3, lines 8 and 9: FEMA Regional Offices review REP plans and forward their recommended findings to FEMA Headquarters for final determination by the Deputy Administrator, NPD. Part IV.B.1.1.1, page IV-3, lines 8 and 9: This sentence shortcuts the process described in greater detail in the paragraph that immediately precedes it, and could be interpreted as providing inconsistent policy. Recommend it be deletedBasis: The prior paragraph, beginning on line 32 of page IV-2, provides a detailed explanation of the FEMA plan review and approval process and the subsequent sentence on lines 8 and 9 of page IV-3 adds nothing but potential confusion.	Accepted	The cited text has been deleted. See Part IV. B Regulatory Summary, Section 1.b 44 CFR Part 350 – Review and Approval of State and Local Radiological Emergency Plans, Overview of Requirements and Procedures.
44 CFR 350 - Initial Plan Review	FEMA-2008-0022-0121-116	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-3 Line: 26-29 Comments: A statement should be made here concerning any security concerns about releasing copies of the plan to the public and how that should be handled.	Modified	This section is a summary of regulatory language. OROs determine whether plans/procedures may be released to the public.
44 CFR 350 - Regional assistance Committee					
44 CFR 350 - Regional assistance Committee	FEMA-2008-0022-0088-009	Anonymous	Page IV-7, lines 7-8: “If the public meeting reveals Deficiencies in the plans or exercise, the Regional Administrator must inform the State and provide recommendations for improvement.” This makes it sound as though the State learns of deficiencies for the first time at the public meeting. Surely the State is informed before the public?	Noted	The State is briefed prior to the public meeting.
44 CFR 350 - Regional assistance Committee	FEMA-2008-0022-0109-043	Ottawa County, Ohio, Koch Beth	page IV-7, lines 7 and 8: If the Public Meeting reveals Deficiencies in the plans or exercise, the Regional Administrator must inform the State and provide recommendations for improvement.COMMENT - Deficiencies should not be assessed based on public meetings. Wording should reflect that public meeting could result in an investigation of allegations.	Noted	The cited text is describing the mandatory public meeting prior to granting of "350" approval. The term “deficiencies” as used in 44 CFR Part 350 (with a lower-case “d”) refers collectively to all planning and preparedness exercise issues. The definition of “Deficiency” (as the term is commonly used now with a capital “D”) was not established until 1993 in the NRC/FEMA Memorandum of Understanding (44 CFR Part 350, Appendix A). A footnote explaining this has been added to the REP Program Manual.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
44 CFR 350 - Regional assistance Committee	FEMA-2008-0022-0097-090	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	page IV-7, lines 7 and 8:COMMENT: The identification of specific Deficiencies would be extremely difficult to verify based solely on testimony provided in the public meeting.BASIS: Suggest that this section be revised to state that if information provided in a public meeting is determined to be a possible Deficiency, the Regional Administrator initiate an investigation into the specific allegations and use the results of that investigation to determine whether there is, indeed, an actual Deficiency.	Noted	The cited text is describing the mandatory public meeting prior to granting of "350" approval. The term “deficiencies” as used in 44 CFR Part 350 (with a lower-case “d”) refers collectively to all planning and preparedness exercise issues. The definition of “Deficiency” (as the term is commonly used now with a capital “D”) was not established until 1993 in the NRC/FEMA Memorandum of Understanding (44 CFR Part 350, Appendix A). A footnote explaining this has been added to the REP Program Manual.
44 CFR 350 - Regional assistance Committee	FEMA-2008-0022-0116-099	Nuclear Energy Institute, Alex Marion	Part IV.B.1.1.3, page IV-7, lines 7 and 8: If the Public Meeting reveals Deficiencies in the plans or exercise, the Regional Administrator must inform the State and provide recommendations for improvement. Part IV.B.1.1.3, page IV-7, lines 7 and 8: The identification of specific Deficiencies would be extremely difficult to verify based solely on testimony provided in the public meeting. Basis: Suggest that this section be revised to state that if information provided in a public meeting is determined to be a possible Deficiency, the Regional Administrator initiate an investigation into the specific allegations and use the results of that investigation to determine whether there is, indeed, an actual Deficiency.	Noted	The cited text is describing the mandatory public meeting prior to granting of "350" approval. The term “deficiencies” as used in 44 CFR Part 350 (with a lower-case “d”) refers collectively to all planning and preparedness exercise issues. The definition of “Deficiency” (as the term is commonly used now with a capital “D”) was not established until 1993 in the NRC/FEMA Memorandum of Understanding (44 CFR Part 350, Appendix A). A footnote explaining this has been added to the REP Program Manual.
44 CFR 350 - Regional assistance Committee	FEMA-2008-0022-0108-185	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: IV-7/IV-10 Line: 31-35/34-37 Comment: DOI is listed in Exhibit IV-1, should it be included in the RAC listing?	Noted	The agencies in this list are those specifically designated in 44 CFR Part 351, which does not include DOI.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
44 CFR 350 - Continued Approval					
44 CFR 350 - Continued Approval	FEMA-2008-0022-0080-038	Douglas Fleck	Page IV-8, Lines 33and 34 state that each local jurisdiction in an EPZ must conduct an exercise every 2-years. In Pennsylvania, FEMA Region III has been using a system where one of our EPZs has all municipalities evaluated every 2-years. The remaining four EPZs are evaluated under a system where only one-third of their municipalities are evaluated every 2-years. It takes 6-years to complete a 100% evaluation of these EPZs. The excuse given is that it takes less evaluators to do it that way in the four EPZs. That could easily be verified by checking records to see if there really is a significant total reduction in needed evaluators for the entire evaluation period. Regardless, there should not be two different standards. It is inherently unfair to have the emergency workers in one EPZ evaluated at three times the rate of the other four. Either FEMA can create a national standard in something as simple as this or the entire program may as well degenerate into miasma of multiple standards dependent on which FEMA region an EPZ is located in. Why aren't other entities such as school districts, state police, field teams, monitoring/decontamination centers and stations, and mass care centers mentioned in this section. They have plans or procedures also.	Noted	FEMA strives to ensure national consistency. The Commonwealth of Pennyslvania can work with FEMA Region III to resolve this issue.
44 CFR 350 - Continued Approval	FEMA-2008-0022-0080a-037	Pennsylvania Emergency Management Agency, Douglas Fleck	Page IV-8, Lines 33and 34 state that each local jurisdiction in an EPZ must conduct an exercise every 2-years. In Pennsylvania, FEMA Region III has been using a system where one of our EPZs has all municipalities evaluated every 2-years. The remaining four EPZs are evaluated under a system where only one-third of their municipalities are evaluated every 2-years. It takes 6-years to complete a 100% evaluation of these EPZs. The excuse given is that it takes less evaluators to do it that way in the four EPZs. That could easily be verified by checking records to see if there really is a significant total reduction in needed evaluators for the entire evaluation period. Regardless, there should not be two different standards. It is inherently unfair to have the emergency workers in one EPZ evaluated at three times the rate of the other four. Either FEMA can create a national standard in something as simple as this or the entire program may as well degenerate into miasma of multiple standards dependent on which FEMA region an EPZ is located in.	Noted	FEMA strives to ensure national consistency. The Commonwealth of Pennyslvania can work with FEMA Region III to resolve this issue.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
44 CFR 350 - Continued Approval	FEMA-2008-0022-0080a-040	Pennsylvania Emergency Management Agency, Douglas Fleck	[Page IV-8, Lines 33and 34] Why aren't other entities such as school districts, state police, field teams, monitoring/decontamination centers and stations, and mass care centers mentioned in this section. They have plans or procedures also.	Noted	This is a summary of the regulation language. The entities listed by the commenter are discussed in exercise guidance.
44 CFR 350 - Continued Approval	FEMA-2008-0022-0080-039	Douglas Fleck	Page IV-9, Line 9 states ingestion exercises are to be conducted every six years. As already explained (Paragraph 21) in this response that would put Pennsylvania on a cycle that would require counties to participate once every thirty years. This has utterly no training value and does nothing to enhance the protection of the general public. The entire ingestion evaluation needs to be revised with a goal of creating proficiency – not merely "checking the block" every six or thirty years.	Modified	Jurisdictions can undertake expanded or additional exercises at their own initiative. FEMA's mandate includes supporting exercises other than biennial exercises. See the Explanation section of Evaluation Criterion N.1.d in Part II.C - Planning Guidance.
44 CFR 350 - Continued Approval	FEMA-2008-0022-0080a-038	Pennsylvania Emergency Management Agency, Douglas Fleck	Page IV-9, Line 9 states ingestion exercises are to be conducted every six years. As already explained (Paragraph 21) in this response that would put Pennsylvania on a cycle that would require counties to participate once every thirty years. This has utterly no training value and does nothing to enhance the protection of the general public. The entire ingestion evaluation needs to be revised with a goal of creating proficiency – not merely "checking the block" every six or thirty years.	Modified	Jurisdictions can undertake expanded or additional exercises at their own initiative. FEMA's mandate includes supporting exercises other than biennial exercises. See the Explanation section of Evaluation Criterion N.1.d in Part II.C - Planning Guidance.
Part IV.C ORO Non-Participation In REP					
Part IV.C ORO Non-Participation In REP	FEMA-2008-0022-0073-070	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-10Comment: Lines 25-27. The referenced FEMA website (http://lwww.fema.gov/about/divisions/thd_repp.shtm) is sorely lacking in references. Virtually none of the REP program references are listed or linked on the website. Additionally, the guidance provided a link to the Code of Federal Regulations (CFR) title page and lists it as a de facto one-stop-shop for REP references. The CFR website is not an easy site to look up references on especially if you are not familiar with how it works. Recommend providing a single link on the FEMA web page (shown above) titled "References." Then provide a page to serve as a clearinghouse for all REP program references to include specific links to other websites (e.g. NRC ADAMS) to assist in locating the program references without having to utilize search functions.Potential Impact: Locating current REP reference documents is difficult and time consuming.	Noted	FEMA REP's website is under development.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.C ORO Non-Participation In REP	FEMA-2008-0022-0108-181	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: IV-11 Line: 28-29 Comment: If listing "site-specific costs," why not list the "flat fees?" It is noted that the site-specific component is related to "plume pathway exercises" only. What costs are related to the ingestion pathway exercises?	Noted	The cited REP Program Manual text is summarizing regulatory language.
Part IV.C ORO Non-Participation In REP	FEMA-2008-0022-0116-100	Nuclear Energy Institute, Alex Marion	Part IV.C, page IV-12, lines 1-9: Non-participating State, Tribal and Local Governments (NUREG-0654/FEMA-REP-1, Supplement 1) Part IV.C, page IV-12, lines 1-9: This section duplicates, albeit with more detail, the content in Section IV.B.3 on page IV-11, lines 7-13. Basis: Recommend the two sections be combined to avoid redundancy and possible inconsistencies.	Rejected	The comment is inconsistent with FEMA policy. The existing REP Program Manual language is intentional. The first section is a summary of the regulatory language in 44 CFR Part 353, whereas the second summarizes NUREG-0654/FEMA-REP-1, Supplement 1.
Part IV.E Severe Reactor Accidents					
Part IV.E Severe Reactor Accidents	FEMA-2008-0022-0113-221	North Carolina Division of Emergency Management, Stephen Payne	Page IV-14, Lines 4-14RECOMMENDATION/COMMENT: DELETE & REWORD AS FOLLOWS:“Supplement 3 to NUREG-0654/FEMA-REP-1, Revision 1, provides guidance for development of Protective Action Recommendations (PARs) for the public for severe reactor accidents involving actual or projected core damage with potential for loss of containment. The guidance updated and simplified the decision-making process for protective actions for severe reactor accidents given in Appendix 1 to NUREG-0654/FEMA-REP-1, Revision 1. In the event of a severe (core damage) accident, the preferred initial protective action is to evacuate the population promptly rather than shelter the population near the plant, barring any constraints to evacuation. Sheltering may be recommended for controlled releases of radioactive material if there is assurance that it will be a short-term release. Further guidance on the range of protective actions is provided in the NRC’s Regulatory Issue Summary (RIS) 2005-08, Endorsement of Nuclear Energy Institute (NEI) Guidance “Range of Protective Actions for Nuclear Power Plant Incidents.”BASIS: By separating this information into the individual paragraphs helps to emphasize the information in paragraph 2 which is of major importance to ORO’s preparing for these events.	Rejected	This section of REP Program Manual language has been modified to explain that Supplement 3 (the basis for this section) is undergoing revision and will be incorporated into the REP Program Manual when appropriate. PADs will be based on situational requirements and ORO plans/procedures.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.F Conducting Plan Reviews					
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-117	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-15 Line: 6-7 Comments: This document has been replaced with FEMA's new Comprehensive Preparedness Guide, *Developing and Maintaining State, Territorial, Tribal and Local Government Emergency Plans* (CPG 101).	Accepted	The REP Program Manual has been amended as suggested. See Part IV.M Conducting Plan Reviews, Section 1 - Radiological Plans and Procedures.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0101-080	Florida Division of Emergency Management, Michael Younger	Page IV-15, lines 6-7 This reference should be updated to reflect FEMA's Comprehensive Preparedness Guide (CPG) 101.	Accepted	The REP Program Manual has been amended as suggested. See Part IV.M Conducting Plan Reviews, Section 1 - Radiological Plans and Procedures.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-118	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-16 Line: 21 Comments: Delete "s" from "requires"	Accepted	The REP Program Manual has been amended as suggested. See Part IV.M Conducting Plan Reviews, Section 2 - Divisions of Functions and Appcibility of Criteria.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-119	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-16 Line: 22 Comments: Delete "s" from "permits" and "requires"	Accepted	The REP Program Manual has been amended as suggested. See Part IV.M Conducting Plan Reviews, Section 2 - Divisions of Functions and Appcibility of Criteria.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-012b	Utility Radiological Safety Board of Ohio, Nancy Dragani	Inordinate amount of detailed information recommended for plan s and procedures can make them unwieldly and ineffective. A clear benefit needs to be realized for information contained in plan and procedures.	Noted	FEMA needs to see enough procedural detail to verify that the intent of NUREG-0654/FEMA-REP-1 is being met.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-120	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-16 Line: 28-30 Comments: With the inclusion of "procedures, and other supporting and referenced materials", this becomes an inordinate amount of material, much does not need to be sent to FEMA for review. This is really stretching it to the point of an unreasonable requirement.	Noted	FEMA needs to see enough procedural detail to verify that the intent of NUREG-0654/FEMA-REP-1 is being met.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-013	Utility Radiological Safety Board of Ohio, Nancy Dragani	Same comment in 4 can be made for information contained in the Annual Letter of Certification. If a clear benefit cannot be realized by including detailed information then the gathering of that information becomes an unnecessary burden on states and counties.	Noted	FEMA considers the information in the Annual Letter of Certification when making its determination of reasonable assurance. FEMA needs to see enough procedural detail to verify that the intent of NUREG-0654/FEMA-REP-1 is being met.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-021	Utility Radiological Safety Board of Ohio, Nancy Dragani	FEMA is requiring an inordinate amount of material be sent for review which includes FEMA reference document s which would seem unnecessary.	Noted	The REP Program Manual is not requiring that FEMA reference documents be sent for review. FEMA needs to see enough procedural detail to verify that the intent of NUREG-0654/FEMA-REP-1 is being met.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0088-010	Anonymous	Page IV-16, lines 31-32, Conducting Plan Reviews: “A REP Plan review is normally conducted by evaluating the plan against the entire set of NUREG-0654/FEMA-REP-1 criteria.” This section does not contain any guidance that will help ensure that a consistent interpretation of requirements is being applied to all plan reviews, nor does not contain any useful information on how to determine whether the plans are Adequate, Adequate- corrections must be made, or Inadequate. Part II is not helpful either because it does not clearly differentiate between those items that are requirements and those that are recommendations; furthermore, “should” and “shall” are not used in an identifiably consistent manner. Recommendation: Divide the explanation for each planning criterion in Part II into two parts, one containing required elements that may be used for plan review purposes and the other containing additional plan development guidance. Use “shall” or “must” when referring to the required elements; use “should” or identify statements as recommendations when discussing non-required guidance.	Accepted	The guidance in Part II of the REP Program Manual has been re-formatted for consistency so that the The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0108-182	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: IV-17 Line: 14 Comment: The "figure below" is not below and should be changed to refer to Exhibit IV-2.	Accepted	The REP Program Manual has been amended as suggested. See Part IV.M Conducting Plan Reviews, Section 3 - Format for Plan Reviews.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0111-033	Illinois Emergency Management Agency, Andrew Velasquez	Page IV-25, GM PR-I and MS-I are listed although Appendix D lists these documents as being superseded.	Accepted	The cited documents have been moved to Appendix D. See Appendix D.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0111-031	Illinois Emergency Management Agency, Andrew Velasquez	The ALC Review Guide on Pages IV-25 - IV-36 is not clear as to its pedigree.	Noted	This version included in the draft REP Program Manual was originally published January 30, 2008.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-121	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-26 Line: Note Comments: Ohio has not held a media day for years due to poor attendance. Information is mailed to the media. Is a statement still necessary?	Modified	Yes. According to the Annual Letter of Certification checklist, in instances of poor attendance, in lieu of a meeting, a statement that program materials covering requisite topics were mailed to media representatives must be provided. See Part IV.O.3 - Annual Letter of Certification, ALC Review Guide. Corresponding language has been added to the Explanation section of Evaluation Criterion G.5 in Part II.C - Planning Guidance.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0109-044	Ottawa County, Ohio, Koch Beth	page IV-29, lines 1-7 (pertaining to Radiological Emergency Response Training information included in the ALC): (2) Date(s) held.(5) agencies/organizations and personnel invited but who did not attend"COMMENT - What is the point/value of documenting agencies/organizations not opting for training?	Noted	This information helps to identify training attendance patterns, and can also provide important background information if a performance issue is observed at an exercise.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-122	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-29 Line: 5 Comments: The State of Ohio can understand listing the primary agencies and organizations. However, the State of Ohio does not think listing mutual aid agencies and organizations is reasonable because through EMAC and intrastate mutual aid agreements we would be talking about thousands of agencies that we could call on. Also, listing individual personnel is totally unreasonable due to the numbers and the turnover. This is something each individual organization needs to keep track of, but not the state. What is the benefit of providing lists of those invited but did not attend? This would be an additional burden to states and counties.	Modified	Individual organizations comprising the EMAC do not need to be listed. The REP Program Manual was modified to remove the term "personnel." Only agencies and organizations need to be listed. See Part IV.O.3 - Annual Letter of Certification, ALC Review Guide.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0036-001	Lake County EMA, Larry Greene	Page Ref. IV-29Comment: (5) - Delete the request for info - "agencies/organizations and personnel invited but who did not attend."Potential Impact: No valid reason for this info.	Rejected	This information helps to identify training attendance patterns, and can also provide important background information if a performance issue is observed at an exercise.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-123	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-29 Line: 9 Comments: Last sentence in comment needs an article such as "the" between the words "in" and "statement".	Accepted	The REP Program Manual has been amended as suggested. The ALC Review Guide has been updated, see Part IV.O - Annual Letter of Certification, Section 3 - ALC Review Guide.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0111-034	Illinois Emergency Management Agency, Andrew Velasquez	Page IV-31 the scope of training requirements on has been expanded to include a new requirement under Item #5, "personnel invited to training who did not attend." This goes beyond what is required and creates a regulatory burden.	Noted	This information helps to identify training attendance patterns, and can also provide important background information if a performance issue is observed at an exercise.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0121-124	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-33 Line: 2 Comments: What is the difference between verify and confirm for the ALC?	Modified	The REP Program Manual has been modified to include only one ALC Review Guide. See Part IV.O.3 - Annual Letter of Certification, ALC Review Guide.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0044-013	Alliance For A Clean Environment , Lewis Cuthbert	Expand the evacuation zone to at least 50 miles, a more realistic number of miles affected by a radiation release, particularly in the predominant wind direction.	Noted	FEMA acknowledges what the commenter wrote. The comment is outside the scope of the current rulemaking and revisions to the REP Program Manual. Changes to regulations governing EPZ boundaries would be addressed through NRC rulemaking. The comment has been shared with the NRC and noted for consideration in future rulemaking.
Part IV.F Conducting Plan Reviews	FEMA-2008-0022-0044-022	Alliance For A Clean Environment , Lewis Cuthbert	10-Mile Evacuation Protection Zone (EPZ) is inadequate. Evidence suggests people hundreds of miles away could be impacted. Chernobyl taught us radiation released during an accident can travel great distances. 50 miles was first discussed in official documents during Limerick planning. So why is the EPZ only 10 miles, especially in the predominant wind direction? There is no magic radiation shield at 10 miles. Vast numbers of people would never even be warned to protect their families. For example in our region, Philadelphia is only 21 miles in the predominant wind direction from Limerick Nuclear Power Plant. Ø The Emergency Preparedness Plan needs to extend the EPZ much farther to be more protective of public health	Noted	FEMA acknowledges what the commenter wrote. The comment is outside the scope of the current rulemaking and revisions to the REP Program Manual. Changes to regulations governing EPZ boundaries would be addressed through NRC rulemaking. The comment has been shared with the NRC and noted for consideration in future rulemaking.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.I State, Local, and Tribal Personnel as REP Exercise Evaluators					
Part IV.I State, Local, and Tribal Personnel as REP Exercise Evaluators	FEMA-2008-0022-0073-071	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-36Comment: Line 1. Use of State, Local, and Tribal Personnel as REP Exercise Evaluators. Evaluators should not be allowed to evaluate within their Region. This would eliminate any opportunity for regional bias or local preconceptions of ORO performance to creep into the evaluation. Evaluators will still need to be briefed by the regional RAC Chair regarding those processes that are unique to the region. The evaluators in turn, must adhere to the EEG in determining whether the exercise objective or task has been successfully met Potential Impact: RECOMMENDATION: REP Exercise Evaluators should be from regions other than the one undergoing evaluation.	Rejected	The existing language in Section IV.I says that State, local, and Tribal evaluators may not evaluate within their State (Home of Record); county personnel may not evaluate their State (Home of Record) or within the EPZ for their site.
Part IV.I State, Local, and Tribal Personnel as REP Exercise Evaluators	FEMA-2008-0022-0104-006	Oregon Department of Energy, Shelley Carson	pg IV-36 Oregon agrees with Washington State's comment: "Line 1. Use of State, Local, and Tribal Personnel as REP Exercise Evaluators. Evaluators should not be allowed to evaluate within their Region. This would eliminate any opportunity for regional bias or local preconceptions of ORO performance to creep into the evaluation. Evaluators will still need to be briefed by the regional RAC Chair regarding those processes that are unique to the region.The evaluators in turn, must adhere to the EEG in determining whether the exercise objective or task has been successfully met". Recommendation: REP Exercise Evaluators (FEMA, State, Local, and Tribal Personnel) must be from regions other then the one undergoing evaluation.	Rejected	The existing language in Section IV.I says that State, local, and Tribal evaluators may not evaluate within their State (Home of Record); county personnel may not evaluate their State (Home of Record) or within the EPZ for their site.
Part IV.I State, Local, and Tribal Personnel as REP Exercise Evaluators	FEMA-2008-0022-0073-082	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-36Comment: Lines 5-15. NUREG-0654, Supplement 4, if approved as is, will contain a requirement by the utility, State and locals, to be HSEEP compliant. There is no complimenting REPP Manual requirement for potential evaluators to have completed the appropriate HSEEP training mentioned in theapplication packet. Recommend including providing evidence of successful completion of the HSEEP Training (UG-146) for all potential REP Evaluators.Potential Impact: Potential evaluators may not be familiar wit the terms and requirements of HSEEP. At a minimum, they should be as equally qualified in HSEEP as those they evaluate.	Noted	OROs are not evaluated on NIMS compliance during REP exercises. HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). OROs are evaluated against the command structures and standards of their own plans/procedures, whether they are using NIMS/ICS or not. The credentialing process for REP evaluators is currently undergoing revision.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.L Public Information Guide and Process					
Part IV.L Public Information Guide and Process	FEMA-2008-0022-0121-125	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page IV-40 Line: 5,6 Comments: Do materials/brochures include EPPI's and Ag brochures?	Modified	Yes. Guidance specific to ingestion exposure pathway public information has been added to this section of the REP Program Manual and the ALC checklist. See Part IV.O.3 - Annual Letter of Certification, ALC Review Guide.
Part IV.L Public Information Guide and Process	FEMA-2008-0022-0110-063	Alabama Emergency Management Agency, J Frank Price	page IV-42, second row; “Formats and Text size” is sometimes dictated by the organization, and FEMA does not need to be involved in this level of detail on something like fonts and text	Noted	The cited information Is a guideline. The intent is to ensure that the materials are legible.
Part IV.L Public Information Guide and Process	FEMA-2008-0022-0121-126	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-45 Line: 2 Comments: Add an "s" to the word "list"	Accepted	The REP Program Manual has been amended as suggested. See Part IV.N Public Information Guide and Process, Section 3.a Foreign Language Translation - Legal Requirements and Location of Information, Legal Background.
Part IV.L Public Information Guide and Process	FEMA-2008-0022-0073-072	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-45Comment: Lines 6 - 18. While the paragraphs provide adequate information on the requirement to translate public education documents and emergency messages into foreign languages, there is no discussion on what constitutes a proper translation of text into the required foreign language. Are mechanical translations acceptable or are more precise translations from court-certified translators necessary? If the answer is what is stated within the jurisdictions REP Plan, then guidance should be provided when the same public education/information documents or EAS Operational Areas (and associated LOAs) are shared amongst plume/ingestion jurisdictions in order to ensure clear and consistent information. Recommend providing clarifying guidance on what constituents proper translation.Potential Impact: Translation by different methods and levels of expertise will lead to public education/information documents and emergency information that are ambiguous or inconsistent within the Emergency Planning Zone.	Accepted	Section 203 of the Voting Rights Act concerns languages spoken on a county-wide basis. A reference to the electronic version of the Voting Rights Act has been added to the REP Program Manual (See Foreign Language Translation of Public Information Materials subsection within the Explanation section of Evaluation Criterion G.1 in Part II.C - Planning Guidance). Written translations of languages do not present the possible misunderstandings that spoken dialects may present. FEMA Regions and RACs can work with OROs to determine the best dialects of given languages to use in oral EAS messages.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.L Public Information Guide and Process	FEMA-2008-0022-0073-083	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-45Comment: Lines 6-18. The statements do not discuss the use of multiple dialects within some foreign languages (e.g. Spanish.) If that language is one of the required translations for public education/information then do all dialects have to be considered or just the dialect spoken by the majority of those speaking that language? How does one determine which dialect is the primary? Would a statement within the REP Plan suffice?Potential Impact: Translation of public education & information into multiple dialects of a foreign language would not only be cost prohibitive, it would also dilute the effectiveness of the message	Noted	Section 203 of the Voting Rights Act concerns languages spoken on a county-wide basis. A reference to the electronic version of the Voting Rights Act has been added to the REP Program Manual. Written translations of languages do not present the possible misunderstandings that spoken dialects may present. FEMA Regions and RACs can work with OROs to determine the best dialects of given languages to use in oral EAS messages.
Part IV.P Disaster-Initiated Review					
Part IV.P Disaster-Initiated Review	FEMA-2008-0022-0108-184	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: IV-51 Line: 9 Comment: "Appendix A" should be "Appendix A to this SOP."	Accepted	The REP Program Manual has been amended as suggested. In addition, "appendix" has been changed to "attachment" to avoid confusion with the REP Program Manual appendices. See Part IV.Q Q. Disaster-Intiated Review.
Part IV.P Disaster-Initiated Review	FEMA-2008-0022-0087-021	South Carolina Emergency Management Division, Danny Loomis	Part IV:Page IV'SI/52: With regards to the equipment listed for a DIR team:Who will purchase It?Who will control it?Where will the kit be stored?Who will maintain It?	Modified	This guidance applies internally to FEMA Regions, not OROs. FEMA Regions are responsible for the DIR kits. REP Program Manual language has been clarified. See Part IV.Q.6 - Q. Disaster Initiated Review, DIR Team Guidance.
Part IV.P Disaster-Initiated Review	FEMA-2008-0022-0121-127	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: IV-51 Line: 28 Comments: Who is tasked with this responsibility, The RAC Chair, the State, or each individual team member as listed on pages IV-50, lines 35-41 and IV-51,lines 1 & 2?	Modified	This guidance applies internally to FEMA Regions, not OROs. FEMA Regions are responsible for the DIR kits. REP Program Manual language has been clarified. See Part IV.Q.6 - Q. Disaster Initiated Review, DIR Team Guidance.
Part IV.P Disaster-Initiated Review	FEMA-2008-0022-0042-014	Ned Wright	Page IV-53 Disaster Initiated Review: Appendix A, B, and C in the Disaster Initiated Review are confusing with the Appendix A, B, and C of the REP Program manual. Suggest renaming to Attachment A, B, and C.	Accepted	The REP Program Manual has been amended as suggested. See Part IV.Q Disaster-Intiated Review.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Part IV.P Disaster-Initiated Review	FEMA-2008-0022-0073-073	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: IV-53 through IV-61Comment: The sections of the Disaster-Initiated Review SOPs are identified with the term Appendix. This can cause some confusion because the REPP Manual also uses the term Appendix as part of its organization. Recommend relabeling the Disaster-Initiated Review SOPs as Attachments vice Appendices.Potential Impact: Confusion on which "Appendix" the reader refers to.	Accepted	The REP Program Manual has been amended as suggested. See Part IV.Q Disaster-Intiated Review.
Appendix A: Abbreviations and Acronyms					
Appendix A: Abbreviations and Acronyms	FEMA-2008-0022-0108-186	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: A-1 Line: 48 Comment: Remove the reference to "CDV - Civil Defense Victoreen." Although Victoreen did sell survey meters, the general reference to CDV is solely as a part number.	Rejected	For historical reference, FEMA is retaining the reference to "Civil Defense Victoreen "when first used in the document. The acronym as a part number has been corrected to read "CD V."
Appendix A: Abbreviations and Acronyms	FEMA-2008-0022-0101-081	Florida Division of Emergency Management, Michael Younger	Page A-2, line 14 This is the only location in the RPM that this term is found.	Noted	Appendix A (acronyms) and Appendix B (glossary) both contain terms used in the REP Program overall. Some of the terms, including the one cited, are not used in the REP Program Manual.
Appendix A: Abbreviations and Acronyms	FEMA-2008-0022-0108-187	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: A-2 Line: 31 Comment: Typo - "DoD" should be "DOD."	Accepted	The REP Program Manual has been amended as suggested. See Appendix A - Abbreviations and Acronyms Used in the REP Program.
Appendix A: Abbreviations and Acronyms	FEMA-2008-0022-0121-128	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: A-7 Line: 31-32 Comments: Need an acronym for OOS for Out of Sequence event.	Accepted	The REP Program Manual has been amended as suggested. See Appendix A - Abbreviations and Acronyms Used in the REP Program.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix B: Glossary of REP Terms					
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0108-008	Louisiana Department of Environmental Quality, Cheryl Chubb	Please consider putting in an appendix the equivalent REP terms to the HSEEP terms (i.e., MESL).	Accepted	HSEEP terms applicable to REP have been added to glossary. See Appendix B - Glossary of REP Terms.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0106-080	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Appendix B, Page B-10, Line 25Comment: The term "civil defense" is archaic and in most states has been replaced by "emergency management". NRC/FEMA should begin use the updated terminology.	Noted	The cited use of the term "civil defense" is part of original NUREG text. NUREG-0654/FEMA-REP-1 is a joint NRC-FEMA document. Changes to original NUREG-0654/FEMA-REP-1 language other than those related to Supplement 4 are beyond the scope of this REP Program Manual revision. When NUREG-0654/FEMA-REP-1 is amended, the REP Program Manual will likewise be amended.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0106-079	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Appendix B, Page B-14Comment: Inert the term "May". "May" is used to indicate a permissible course of action.	Accepted	The REP Program Manual has been amended as suggested. See Appendix B - Glossary of REP Terms.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0108-189	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: B-15 Line: 35 Comment: Using the surrounding entries as guidance, the "Milliroentgen" should be "milliroentgen."	Accepted	The REP Program Manual has been amended as suggested. See Appendix B - Glossary of REP Terms.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0093-030	Texas Department of State Health Services, Bob Free	Appendix B: Different (somewhat contradicting) REP definitions of an ORO. By the REP definition in Appendix B page B-17, OROs do not include Licensee offsite response organizations in general. It only recognizes the licensee as an ORO if they were formed when State, local, and/or tribal governments fail to participate in the REP Program. This contradicts the original REP definition of ORO found in Supplement 1 of NUREG-0654/FEMA-REP-1, Rev.1, on page 5: “Offsite response organization is defined as the utility offsite emergency response organization along with other participating voluntary and private organizations, and local, State and Federal governments engaging in the development of offsite emergency plans for a nuclear power plant”. Nuclear power plants (Licensees) have offsite emergency response organizations regardless of whether or not the State and local governments engage in the development of nuclear site-specific offsite emergency plans and these organizations should be recognized as an ORO. The definition for ORO on page B-17 should be corrected to match the NUREG 0654/ FEMA-REP-1 definition.	Modified	The glossary definition of Offsite Response Organization has been amended to include the licensee's offsite response organization. See Appendix B - Glossary of REP Terms. All discussion of Evaluation Criterion C.5 and Supplement 1 has been moved to Part IV.C - Non-participating State, Tribal, and Local Governments.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0108-058	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: B-23 Line: 20-22 Comment: The "relocation center" is defined as a facility where monitoring, decontamination, registration AND congregate care occurs, "also referred to as congregate care centers." On page B-4, congregate care center is defined as "temporary housing, care and feeding of evacuees." On page B-22, reception center "generally refers to a facility where monitoring, decontamination and registration of evacuees are conducted. A reception center can also be referred to as a "relocation center." There is enough confusion in the manual that these three terms should be defined as complete and separate entities. CCC = CCC, RC = RC, Relocation center = RC + CCC. Pick one definition for "relocation center" so that plans/procedures are consistent through the regions.	Modified	The REP Program Manual glossary entry for reception/relocation center has been clarified. See Appendix B - Glossary of REP Terms. There is no single term that fits universally. NUREG-0654/FEMA-REP-1 uses the term "relocation center," but terminology varies across the country for locations that perform monitoring/reception and those that perform mass care. In addition, some are combined facilities and some are separate.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0106-081	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref. RED-LINE VERSION: Appendix B, Page B-24Comment: Insert definitions for the terms "Shall" and "Should". Legally, the term "Shall" means something is mandatory, and "Should" means something is expected or recommended, but not mandatory.Potential Impact: Eliminates bickering as to what is required and what is recommended	Modified	The REP Program Manual contains guidance on how to meet the intent of the regulations in 44 CFR Part 350, which incorporates the Planning Standards and Evaluation Criteria of NUREG-0654/FEMA-REP-1 by reference. The text in Part I.A - Purpose has been modified to include an explanation of requirements versus guidance. Language in the REP Program Manual cited directly from regulatory material uses both "shall" and "should" to denote requirements. The remaining text in the REP Program Manual uses the terms "shall," "must," and "require" to denote mandatory items originating in regulatory material including NUREG-0654/FEMA-REP-1 and the Code of Federal Regulations. The terms "should,' "suggest," and "recommend" denote guidance outlining a Federally-approved means of meeting the intent of the REP regulations. OROs may propose alternate means for meeting the intent of NUREG-0654/FEMA-REP-1, as outlined in Part I.D - Evaluation of Radiological Emergency Preparedness, Alternative Approaches and Methods. The term "may" denotes an option, neither requirement nor recommendation. The entire REP Program Manual has been reviewed for consistent use of these terms.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0073-074	Washington Military Department Emergency Management Division, Jim Mullen	Document: REPP Manual Page Ref.: B-24Comment: Lines 8-30. The definition of Shelter-in-Place (SIP) IS not consistent with the intent of the term "Shelter" used in NUREG-0654 Supplement 3. Supplement 3 states (Section II, pg 3) that persons in the remainder of the plume exposure pathway EPZ should go indoors and listen to the EAS while the situation is further assessed. The definition of SIP provided by many organizations (CSEPP, Red Cross, Ready.Gov, National Institute on Chemical Studies (NICS), etc.) all include the use of plastic and duct tape to seal up door, windows, and other openings that would allow air to flow. This is not necessary when meeting the intent of Supp 3. Recommend including a definition for Heightened Awareness or Take Cover (I.e. go inside and listen to the radio/TV) as an alternative to the use of the term Shelter-in-Place.Potential Impact: Confusion on the part of emergency planners as to what protective actions should be recommended for those residents in the 10-mile EPZ NOT in the projected plume pathway. Also, on the part of EPZ residents and businesses as to what they are really being asked to do; go inside and listen for more information from public officials.	Noted	The definition of shelter in place in the REP Program Manual glossary is the current REP definition. Supplement 3 is currently under revision. Revised guidance will be incorporated as appropriate into the REP Program Manual when the Supplement 3 revision is finalized.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0042-019	Ned Wright	Add definition from of Special Needs from National Incident Management System (NIMS) FEMA 501 glossary. “Special Needs Population: Pertaining to a population whose members may have additional needs before, during, and after an incident in one or more of the following functional areas: maintaining independence, communication, transportation, supervision, and medical care. Individuals in need of additional response assistance may include those who have disabilities; who live in institutionalized settings; who are elderly; who are children; who are from diverse cultures, who have limited English proficiency, or who are non-English speaking; or who are transportation disadvantaged.” Also change term definition in Appendix B-Glossary, B6, Line 30.	Modified	The glossary entry for "Persons with disabilities and access/functional needs" has been expanded to include the elements in the NIMS definition. See Appendix B - Glossary of REP Terms.
Appendix B: Glossary of REP Terms	FEMA-2008-0022-0077-012	PA DEP Bureau of Radiation Protection, David Allard	Page C-1Comment: FEMA-REP-13, "Guidance on Offsite Emergency Radiation Measurement Systems, PHASE 3 - Water and Non-Dairy Food Pathway", is not listed in Appendix C as an active document, nor is it listed in Appendix D as a retired/superseded document. What is the status of FEMA-REP-13?	Modified	FEMA-REP-13 has been added to the list of currently active documents. See Appendix C - REP Guidance References.
Appendix C: REP Guidance References					
Appendix C: REP Guidance References	FEMA-2008-0022-0111-037	Illinois Emergency Management Agency, Andrew Velasquez	As with Appendix C this appendix is a valuable addition to the document. There is still the potential for some confusion. An example of this is while on page D-I it lists NRC Information Notice 85-55 as being superseded, it does not state other NRC Information Notices as being superseded such as 82- 4, Clarification of Exercise Requirements. Other NRC Information Notices that deal with exercises are 84-05,84-05 Revl, and 87-54. Over the years the NRC has issued many publications that deal with Emergency Planning. If it is FEMA's intent to include NRC publications in this appendix then the NRC should provide a list of obsolete references.	Noted	It is not FEMA's intent to include NRC documents.
Appendix C: REP Guidance References	FEMA-2008-0022-0042-015	Ned Wright	Appendix C: “REP Guidance References,” Pages C-1 through C-4: References cited throughout the document should be in a format, for the electronic version, that enables the reader/user to link or recall the original document from the FEMA library. Too many practitioners do not have all of the necessary references in their “office” library.	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. . The comment has been noted for consideration.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix C: REP Guidance References	FEMA-2008-0022-0093-031	Texas Department of State Health Services, Bob Free	Appendix C: REP Guidance References All stand-alone FEMA-REP series documents and "Technical References" listed in Appendix C should be combined in a single document and made available to REP Stakeholders.	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. . The comment has been noted for consideration.
Appendix C: REP Guidance References	FEMA-2008-0022-0111-035	Illinois Emergency Management Agency, Andrew Velasquez	The inclusion of an appendix with references to REP documents is very valuable. IEMA recommends that FEMA create a web page version of this appendix with quick links to the documents. It would also have been useful to reference these documents more in the body of the REP Manual.	Noted	This comment is outside the scope of the current revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. . The comment has been noted for consideration.
Appendix C: REP Guidance References	FEMA-2008-0022-0101-009	Florida Division of Emergency Management, Michael Younger	The REP guidance documents listed in Appendix C should also be included under the appropriate criteria or cross walked to the appropriate criteria the document applies to.	Noted	Creation of a full index is under consideration for future revisions.
Appendix C: REP Guidance References	FEMA-2008-0022-0088-011	Anonymous	Appendix C: REP Guidance References. A number of the references in this list appear to have been wholly incorporated into the manual, including RG REP 02, GM 5, GM 20, GM 24, disaster-initiated review guidance, and quite a few of the memos. If one of the objectives of the new manual was to consolidate active guidance, it seems as though these incorporated documents could be retired. Footnotes or other annotations referring back to the retired documents list could be added to trace the information source. Given the number of earlier guidance documents that have contributed to the current modus operandi, such linkage would have been useful from the start.	Noted	Superseded documents have been moved to Appendix D.
Appendix C: REP Guidance References	FEMA-2008-0022-0111-032	Illinois Emergency Management Agency, Andrew Velasquez	The annotated version states that it replaces RG-REP 02, Rev. 9, however, Appendix C still references REG-REP 02, Rev. 9 as being a valid reference.	Accepted	RG-REP 02, Rev. 9 has been moved to Appendix D. See Appendix D - Historical REP Guidance References.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix D: Historical REP Guidance References					
Appendix D: Historical REP Guidance References	FEMA-2008-0022-0101-082	Florida Division of Emergency Management, Michael Younger	Page D-1, lines 16-19 The term CPG should be spelled out as "Civil Preparedness Guide" to avoid confusion with "Comprehensive Preparedness Guide." (see comment above)	Accepted	The REP Program Manual has been amended as suggested. See Appendix D - Historical REP Guidance References.
Appendix F: Target Capabilities List					
Appendix F: Target Capabilities List	FEMA-2008-0022-0108-190	Louisiana Department of Environmental Quality, Cheryl Chubb	Criterion: App F IMS: All Comment: TCL 2.0 was issued in 2007, when is it expected for a new TCL to be issued? It could be beneficial to note the TCLs that are most likely to be applicable to the REP program. Will the capabilities' EEG activities be applicable to REP and/or will REP activities be added to the list? Are the EEG activities equivalent to the criterion required to be demonstrated during an exercise?	Noted	EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. This crosswalk has been added to the REP Program Manual. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.
Appendix F: Target Capabilities List	FEMA-2008-0022-0117-040	California Emergency Management Agency, Elaine Jennings	REP MANUAL REFERENCE: Appendix F – Target Capabilities ListComments: The current TCL does not directly apply to the REP program. explanation/RecommendatioN: Please add the proposed FEMA REP TCLs to Appendix F.	Modified	EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. This crosswalk has been added to the REP Program Manual. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.
Appendix F: Target Capabilities List	FEMA-2008-0022-0128-037	San Luis Obispo County Office of Emergency Services , Ron Alsop	The TCL does not apply to the REP program. The established National Preparedness Goal, HSPD-8, is also not applicable to REP. Explanation/recommendation: Please remove appendix F and or replace it with a REP specific TCL.	Modified	EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. This crosswalk has been added to the REP Program Manual. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.
Appendix F: Target Capabilities List	FEMA-2008-0022-0042-016	Ned Wright	Appendix F, "Target Capabilities List," Page F-1: Suggest linking the TCL to specific NUREG-0654/FEMA REP-1 unique requirements. This could be accomplished by addressing the REPP requirements in the TCL document or address the REPP related TCLs in the REPP Program Manual.	Modified	EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. This crosswalk has been added to the REP Program Manual. See Appendix G - Integration of REP Criteria and HSEEP Capabilities.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-129	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part II.b.5 Page: 5 Line: 14-16 Sentence of Summary Paragraph: Such integration will not, however, establish any additional exercise requirements for the REP Program or replace existing REP evaluation criteria with new capabilities. Comments: It may not establish any new exercise requirements in the way of criteria but it does establish quite a number of new administrative requirements for REP exercises, which will take many additional man hours to accomplish.	Noted	After adjudicating all public comments and finalizing the REP Program Manual and Supplement 4, implementation strategy will be developed and coordinated with FEMA Regions, FEMA Management/Leadership, and the NRC. The implementation strategy (short and long-term) will take into account timeline, stakeholder interests, procedures, capacities, and needed resources. Final implementation strategy will be released soon after the publication of the final REP Program Manual and Supplement 4.
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-130	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part II. b.1.a Page: 5 Line: 33-34 Sentence of Summary Paragraph: ORO plans shall be compliant with the National Incident Management System (NIMS). Comments: How? This document and the REPP Manual do not provide any criteria on how to do this or when it has to be accomplished.	Noted	The REP Program Manual has been amended to remove the statement that NIMS compliance is required (See modifications to NUREG Criteria A.1.a, A.1.b, A.1.c, and A.2.a in Part II.C - Planning Guidance). HSPD-5 requires Federal departments and agencies to make adoption of NIMS by State, Tribal, and local organizations a condition for Federal preparedness assistance (through grants, contracts, and other activities). The REP Program is a voluntary program. Those OROs who elect to participate agree to abide by the rules promulgated by FEMA. The FEMA REP program highly recommends that OROs adopt and be trained on NIMS to ensure policy and procedural alignment with HSPD-5, the National Response Framework, and other National Preparedness Systems. NIMS/ICS Training is available at the Emergency Management Insitute by visiting training.FEMA.gov. The REP Program Manual and Supplement 4 have been modified to clarify this to include clear delineation of what is required versus highly recommended (See Part I.A -Purpose for an explanation of requirements versus guidance). OROs are not evaluated on NIMS compliance during REP exercises.
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-134	Utility Radiological Safety Board of Ohio, Nancy Dragani	Page: 8 Sentence of Summary Paragraph: New Evaluation Criterion. Comments: C.5 is also a new Evaluation Criterion according to the proposed REP Program Manual.	Modified	The cited reference has been deleted. Evaluation Criterion C.5 was added in 1988 through Supplement 1, but applies only in instances where State, Tribal, or local OROs decline to participate in REP planning.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-135	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: IV.1 Page: 9 Line: 34 Sentence of Summary Paragraph: "At least one exercise scenario per exercise cycle, at a frequency of at least once every 8 years" Comments: Has the exercise cycle changed to 8 years from 6 years and when and where is this documented?	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-136	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: IV.1 Page: 9 Line: 41-42 Sentence of Summary Paragraph: However, reaching the General Emergency is not required, provided that the OROs adequately demonstrate all appropriate biennial criteria. Comments: What is "appropriate biennial criteria"? This will need to be clarified and defined.	Modified	Criterion N.1.b has been amended. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario only once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9. Expanded guidance on this subject is found in the Scenario Variations subsection within the Explanation Section for Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-137	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: IV.2 Page: 10 Line: 14-15 Sentence of Summary Paragraph: Licensee, State, and local agencies must demonstrate a full range of protective actions for all jurisdictions within the Plume Exposure Pathway EPZ in the 6-year exercise cycle. Comments: There is a conflict Is the exercise cycle 8 years or 6years--previous page references an 8 year cycle, this page refers to a 6 year cycle.	Modified	The REP Program Manual language in Criterion N.1.b regarding the exercise cycle length has been clarified. In order to allow more flexibility in scenario variations, the exercise cycle is being extended to 8 years. See the Frequency of Exercises and Scenario Variations subsection within the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance. In addition, FEMA is implementing an enhanced assessment strategy that supplements exercise evaluation with additional means of ascertaining preparedness. Part III.B - REP Exercise Process, Section 1.b - Scheduling REP Activities, Exercise Cycle Requirements has been expanded to provide additional information.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
Appendix F: Target Capabilities List	FEMA-2008-0022-0121-138	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: IVA Page: 11 Line: 9 thru 10 Sentence of Summary Paragraph: At least one exercise over a period of six years, should be unannounced. FEMA did away with unannounced exercises--why are they coming back? Out of sequence activities would be impossible to conduct unannounced. If the EOC activities are the only ones to be conducted --what is the purpose? EOC are activated unannounced many times "unannounced" for natural events.	Modified	REP Program Manual has been corrected to agree with Supplement 4 and remove the language requiring OROs to conduct exercises off-hours, under various weather conditions, and unannounced. See the Explanation section of Evaluation Criterion N.1.b in Part II.C - Planning Guidance.
Supplement 4 to NUREG-0654					
I. Introduction					
I. Introduction	FEMA-2008-0022-0106-003	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 2Comment: Ref I.A.II: National Preparedness Initiatives have been integrated into ORO local emergency response plans and radiological emergency response plans and activities as directed by DHS through NEMA. NEMA certifies compliance of local planning standards through the development of local planning guidance and designated templates for the State of Nebraska that meet the requirement of NIMS/ICS, comply with the National Exercise Program and incorporate the use of the Homeland Security Exercise Evaluation Program (HSEEP) into local planning/exercises and emergency operations.Potential Impact: Requirements beyond those required by the State of Nebraska for only seven (7) Nebraska as counties exceeds the authority of NRC/FEMA and places a heavy additional regulatory burden on small counties with limited Emergency Management planning and operational staffing.	Noted	Additional discussion of REP/HSEEP integration has been added to the REP Program Manual, Part III.A - Introduction and Part III.B - REP Exercise Process. HSEEP is an exercise methodology only, and is not intended to supersede the entire REP program, nor does it change the delivery of the REP Program for OROs. FEMA is mandated to assess the adequacy of offsite radiological emergency plans and preparedness to protect the health and safety of the public using criteria specified in 44 CFR Part 350.5 and NUREG-0654/FEMA-REP-1. HSEEP is flexible enough to allow REP to retain its unique aspects, including the evaluation criteria and certain core terminology. While HSEEP will be used in the planning of REP exercises and for after action reports, other aspects will necessarily be blended. EEGs have been built with capabilities, using REP criteria as activities under the capabilities, and target capabilities have been cross-referenced to NUREG-0654/FEMA-REP-1 criteria. ARCAs and Deficiencies will continue to be utilized for exercise issues that directly affect the health and safety of the public. However, other recommendations/areas for improvement will be handled in the HSEEP no-fault manner.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
I. Introduction	FEMA-2008-0022-0106-004	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 2Comment: Ref I.A.III: The relationship between nuclear power stations and local jurisdictions constituting the ORO has been well documented, practiced, and evaluated by FEMA for years. The insertion of NRC inspection of the OROs beyond those belonging specifically to the Licensee is a new requirement that is an increase in regulatory intrusion into local planning and operational requirements that is regulated by the sovereign State of Nebraska and a violation of the 10th Amendment to the Constitution of the United States. Memorandums of Understanding (MOUs) between Nebraska counties for a broad range of contingencies (All Hazard) are the responsibility of the sovereign State of Nebraska, designated Councils of Government (COGs), and the local jurisdictions. Hostile action-based (HAB) events are already part of local jurisdiction planning and operational efforts in an Annex dealing specifically with Terrorism and designated as a required planning document by Nebraska. Traffic Control Points (TCPs) and route alerting, etc. are portions of FEMA biennial evaluations that have been inspected on a routine basis for many years.	Noted	The relevant Supplement 4 and corresponding REP Program Manual language refers to coordination between OROs and licensees specifically as it relates to planning for HAB incidents. It does not extend NRC authority into any areas where it did not exist previously. FEMA has provided this comment to the NRC for situational awareness.
I. Introduction	FEMA-2008-0022-0097-004	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	The relationship between nuclear power plants and local jurisdictions constituting the ORO has been well documented, practiced, and evaluated by FEMA for years. The insertion of NRC inspection of the OROs beyond those belonging specifically to the Licensee is a new requirement that is an increase in regulatory intrusion into local planning and operational requirements.	Noted	The relevant Supplement 4 and corresponding REP Program Manual language refers to coordination between OROs and licensees specifically as it relates to planning for HAB incidents. It does not extend NRC authority into any areas where it did not exist previously. FEMA has provided this comment to the NRC for situational awareness.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
I. Introduction	FEMA-2008-0022-0111-007	Illinois Emergency Management Agency, Andrew Velasquez	It is somewhat surprising that on page 1 of the document under Purpose that the statement is made that FEMA and NRC jointly issue this document for the review of and evaluation of offsite radiological emergency response planning and preparedness. This is because under Scope on page two it points out that licensees will find guidance on the topics contained in Supplement 4 to NUREG-0654 under the NRC document NSIR/DPR-ISG-Ol, Interim Staff Guidance for Nuclear Power Plants. While it is an admirable effortto produce additional guidance and in the case of Supplement 4 to NUREG-0654 revise certain criterion contained in Rev. 1 to NUREG-0654, the multiple guidance documents and partial revision to NUREG -0654 makes the task of finding guidance in one location almost impossible. It would be helpful to have a crosswalk that shows the various NUREG-0654 criterion and the corresponding document sections that contain amplifying or corrected information.	Noted	Comment does not contan specific suggested revisions to the REP Program Manual. Onsite and offsite implementation of the provisions in NUREG-0654/FEMA-REP-1 (including Supplement 4) may take different forms because of the different roles of the organizations involved. The NRC provides detailed guidance for licensees in its Interim Staff Guidance, whereas FEMA provides detailed guidance for OROs in the REP Program Manual.
I. Introduction	FEMA-2008-0022-0108-191	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 2 - I.A.V - This notes "recent exercises." The exercises or the lessons learned should be reference as "recent" exercises will not always be "recent."	Modified	NUREG-0654/FEMA-REP-1 Supplement 4 has been amended to delete the reference to "recent" exercises throughout the document.
I. Introduction	FEMA-2008-0022-0108-192	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 3 - I.B - At this point in the document, EP has not been defined. Please define "EP" before utilizing the acronym for the remainder of the document.	Accepted	Supplement 4 has been amended to remove "EP" and replace it with "emergency preparedness." See NUREG-0654/FEMA-REP-1 Supplement 4, Part A.2 - Introduction, Authorities.
II. Integration of NP Initiatives					
II. Integration of NP Initiatives	FEMA-2008-0022-0102-003	Entergy Nuclear Operations, Inc., Michael Slobodien	Section II Page 3 (Bottom Paragraph) states: “The recent national preparedness initiatives HSPD-5: Management of Domestic Incidents and HSPD-8: National Preparedness and PKEMRA establish a unified and coordinated approach to all hazards preparedness and response based on NIMS, the National Response Framework (NRF), and the NEP “.Comments: The reference to the “NEP” should be stated as the “National Exercise Program (NEP)” for clarity in this portion of the text.	Rejected	The term National Exercise Program and the corresponding acronym identification are found the first time it is used in NUREG-0654/FEMA-REP-1 Supplement 4 in Part A.1 - Introduction, Purpose and Use of this Document. After the initial use, only the acronym is used.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
II. Integration of NP Initiatives	FEMA-2008-0022-0101-083	Florida Division of Emergency Management, Michael Younger	II - Integration of National Preparedness Initiatives intoORO Response Plans and Activities (pages 3-4) Elements of the NRF are applicable to ORO planning for a wide range of hazards and emergencies. The first paragraph is very accurate in stating the importance of HSPDs 5 & 8 and PKEMRA have on the all hazards planning approach. However, the second paragraph is far too open-ended in nature and contradictory to the all hazards approach discussed in the first paragraph. This paragraph should be deleted from NUREG-0654 Supplement 4.	Rejected	FEMA disagrees and finds that the cited information is relevant to ORO planning and preparedness.
II. Integration of NP Initiatives	FEMA-2008-0022-0102-004	Entergy Nuclear Operations, Inc., Michael Slobodien	Section II Page 4, 2nd Paragraph states: This statement is rather open-ended for inclusion without additional explanation in NUREG-0654 Supplement 4 for REP programs and planning requirements. Recommend that the statement be deleted.Rationale: Elements of the NRF are applicable to ORO planning for a wide range of hazards and emergencies. Any applicable NRF elements that specifically apply to REP beyond other hazard planning efforts, should be clearly identified in NUREG-0654, Supplement 4 as to how they are applicable to ORO REP plans and procedures.	Rejected	The elements of the NRF cited are those specific to the REP Program.
II.b NEP/ HSEEP					
II.b NEP/HSEEP	FEMA-2008-0022-0108-195	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 5 - There is reference to two "1.a." Please change one to A.1.a and the other to N.1.a.	Modified	The modifications to A.1.a have been removed and A.1.a is no longer in NUREG-0654/FEMA-REP-1 Supplement 4.
III. HAB Events					
III. HAB Events	FEMA-2008-0022-0101-095	Florida Division of Emergency Management, Michael Younger	III – Planning and Preparedness for HAB Events (pages 6-8) There are a number of presumptive and hypothetical statements made throughout this section. Instead, the focus should be on key planning issues for hostile action based events such as: ORO plans and procedures should be coordinated with the licensee to provide for prompt access to the NPP site for initial first responders (e.g., law enforcement).	Noted	The comment does not contain any specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III. HAB Events	FEMA-2008-0022-0116-101	Nuclear Energy Institute, Alex Marion	This requirement would have significant implications on the exercise submittal, review, approval and implementation process. The contents of these scenarios could meet the Safeguards threshold (e.g., target set information) or otherwise provide information advantageous to an adversary. Unlike FOF exercises, emergency preparedness exercise scenario materials are provided to personnel outside of the licensee's control.	Noted	The comment does not contain any specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
III. HAB Events	FEMA-2008-0022-0108-196	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 6 - III - LLEA has not been defined in the document yet.	Accepted	NUREG-0654/FEMA-REP-1 Supplement 4 has been amended to define LLEA in the cited location. See Part C - Coordination Between OROs and Licensees During a Hostile Action-Based Incident.
III. HAB Events	FEMA-2008-0022-0121-131	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: III Page: 7 Line: 1 thru 3 Sentence of Summary Paragraph: Licensee agreements with OROs (e.g., memoranda of understanding or letters of agreement) should also be updated to reflect the arrangements for HAS events at an NPP site. Comments: What is the need to have licensee develop agreements with the ORO's for HAS events. There are no agreements for other events. ORO's would respond to the licensee as they would for any event--fire, etc.	Modified	The NUREG-0654/FEMA-REP-1 Supplement 4 language has been clarified regarding mutual aid during HAB incidents. The intent is to provide planning considerations to help OROs ensure that provisions are in place in case of an HAB incident specifically involving a nuclear power plant that overwhelms local resources. OROs should ensure that existing LOAs would apply in HAB events, and/or identify new LOAs that are needed. Existing mutual aid arrangements could satisfy the intent of the criterion. Mutual aid agreements can be demonstrated during exercises as negotiated in the extent-of-play agreement. See Part C - Planning and Preparedness for Hostile Action-Based Incidents.
III. HAB Events	FEMA-2008-0022-0121-132	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: III Page: 7 Line: 12 Sentence of Summary Paragraph: ORO plans and procedures should also include provisions for just- in time training. Comments: Even for dosimetry and KI, just in time training may not be possible during a hostile action event when a rapid response may be critical. The assumption is that there will be a minimal amount of time available to provide just in time training. This may not be a valid assumption in many potential scenarios.	Modified	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote. OROs should do their best to provide needed training, but FEMA acknowledges that extreme circumstances may prevent its delivery. See NUREG-0654/FEMA-REP-1 Supplement 4, Part C - Planning and Preparedness for Hostile Action-Based Incidents.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
III. HAB Events	FEMA-2008-0022-0121-133	Utility Radiological Safety Board of Ohio, Nancy Dragani	Part: III Page: 7 Line: 20-23 Sentence of Summary Paragraph: This effort should be automatically implemented when the emergency action level and the event classification indicate that there is an HAB that would take the ORO resources away from normally assigned roles and responsibilities in the emergency response plans. Comments: It states that this is automatic when an EAL and event classification indicates that ORO resources would be taken away. When is it determined that ORO resources will be depleted, in the pre-planning stage or during the incident. It appears this will be pre-planning with a direct connection to an EAL. If this is so, who makes the decision and how does this authority measure the amount or resources available and which resources to assess?	Modified	The NUREG-0654/FEMA-REP-1 Supplement 4l has been clarified to define "automatically" as "actions pre-authorized by the appropriate authority." See also NIMS page 33, Section III.A.2.b.2 on "Use of Agreements" and page 15, Section I.B.3.d, "Private Sector," second paragraph. See Part C - Planning and Preparedness for Hostile Action-Based Incidents.
III. HAB Events	FEMA-2008-0022-0108-200	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 8 - III - Should the C.6 note state "C.5?"	Modified	The referenced note in Supplement 4 was intended to explain why the new criterion was numbered C.6. The note has been deleted to avoid confusion. See NUREG-0654/FEMA-REP-1 Supplement 4, Part C - Planning and Preparedness for Hostile Action-Based Incidents.
IV.1 Predictability of ECLS					
IV. Challenging Drills and Exercises	FEMA-2008-0022-0108-202	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 9 - IV.1 - Font problem - "per exercise cycle, at a frequency of at least once every 8 years"	Accepted	The NUREG-0654/FEMA-REP-1 Supplement 4 has been amended as suggested. The font have been made consistent throughout the document
IV.2 Release Options					
IV.2 Release Options	FEMA-2008-0022-0116-009	Nuclear Energy Institute, Alex Marion	In the draft NRC ISG, NUREG -0654, Supplement 4, and the draft FEMA REP Program Manual, the NRC and FEMA are proposing that consecutive hostile action-based scenarios can not have a no-release or minimal radiological release component; thus, every other HAB exercise will be required to include a radiological release.	Noted	It is not possible to eliminate all predictibility. The planners will have some awareness of what type of scenario to expect, but the players do not necessarily have the same level of awareness. The scenario enhancements in this revision of the REP Program Manual are a big step toward reducing predictability.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
IV.4 Broader Spectrum of Initiating Events					
IV.4 Broader Spectrum of Initiating Events	FEMA-2008-0022-0108-203	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 11 - IV.4 - Font problem - "exercise cycle, at a frequency of at least once every 8 years"	Accepted	The NUREG-0654/FEMA-REP-1 Supplement 4 has been amended as suggested. The font have been made consistent throughout the document
IV.4 Broader Spectrum of Initiating Events	FEMA-2008-0022-0097-089	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	page IV-12, lines 1-9: COMMENT: This section duplicates, albeit with more detail, the content in Section IV.B.3 on page IV-11, lines 7-13.BASIS: Recommend the two sections be combined to avoid redundancy and possible inconsistencies.	Rejected	The comment is inconsistent with FEMA policy. The existing NUREG-0654/FEMA-REP-1 Supplement 4 language is sufficient. The first section is a summary of the regulatory language, whereas the second is implementation guidance.
V. Backup Alert and Notification					
V. Backup Alert and Notification	FEMA-2008-0022-0129-056	Wisconsin Emergency Management, Teri Engelhart	Page: 12 Line: Section V Comment: Verifying that a backup Alert and Notification System is functioning during each exercise can be cost prohibitive depending upon the medium. For example, "Reverse-911" systems are billed on a per-call basis. If demonstrating such a backup system becomes a requirement, credit should be given for use of this system during real-world events	Noted	Demonstration of alerting systems such as reverse-911 are negotiated in the extent-of-play agreement. Jurisdictions may apply to FEMA for credit. Use of reverse-911 systems would have to be approved by FEMA.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0126-013	Pilgrim Watch, Mary Lampert	NUREG-0654/FEMA-REP-1, Appendix 3, Section B.2, is revised so that, "b) The initial notification system will assure direct coverage of essentially 100% of the population within 5 miles of the site." However there is a "lack of a specific design objective for a specified percent of the population between 5 and 10 miles which may receive the prompt signal within 15 minute …to allow flexibility in the system design" (at V. d). [Emphasis added.] Pilgrim Watch objects because the lack of a design objective for the population between 5-10 miles rests on false assumptions. It assumes an accident of minimal release, discussed above at 6. It ignores site specific meteorology that indicates concentrated plumes can travel longer distances, discussed above at 5. It incorrectly assumes that a staged evacuation is possible; that is if only those closest to the plant are notified, then only that population will respond. It incorrectly assumes that the population outside 5 miles either will remain unaware of the event or will carry on about their ordinary business. What's wrong? Today's communication capabilities assure that news will travel quickly – emails, text messaging, cell phones, etc. We are a highly interconnected society. Studies regarding "shadow evacuation" inside and outside the EPZ indicate that the public will respond once they become aware.	Noted	This comment does not contain specific suggested revisions to the REP Program Manual. FEMA acknowledges what the commenter wrote.
V. Backup Alert and Notification	FEMA-2008-0022-0106-039	Nebraska Emergency Management Agency, Jonathan Schwarz	Page Ref.: Page 17Comment: Ref Appendix 3, Section C.3.g: The addition of the last paragraph of the publication is unnecessary unless there is an intention to designate an "independent backup means of public notification".Potential Impact: This addition is subject to interpretation by FEMA evaluators. Cost of additional notification systems cannot be expected of the local jurisdictions. Does this mean "Route Alerting"?	Noted	Backup route alerting is an acceptable backup to the siren system as long as it can provide coverage of essentially 100% of the population in the event the primary method is unavailable.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0044-023	Alliance For A Clean Environment , Lewis Cuthbert	Back-up power for warning sirens is not required at Limerick and many other nuclear power plants. It is ludicrous to believe in densely populated areas around nuclear plants that it is practical or acceptable to rely on bull horns and door knocking to alert hundreds of thousands of people. Even if emergency personnel would not abandon the mission to avoid their own radiation exposure, their time would be far better spent dealing with emergencies that would result from a nuclear disaster. August, 2006 it was reported that out of the 63 nuclear power stations across the U.S., only 17 had sirens that could be heard during a power failure. During an August, 2006 power outage around Limerick Nuclear Plant, 48 of 165 off-site sirens were off-line for 5 days. Instead of providing back-up power for sirens in black-outs, Exelon illogically still plans to warn potentially hundreds of thousands of people of a radiological emergency with emergency workers driving through the vast numbers of crowded streets making announcements with bull horns or knocking on doors, all while people are attempting to evacuate.	Noted	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.
V. Backup Alert and Notification	FEMA-2008-0022-0106-037	Nebraska Emergency Management Agency, Jonathan Schwarz	Is backup power going to be a future requirement for fixed sirens?	Noted	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.
V. Backup Alert and Notification	FEMA-2008-0022-0108-210	Louisiana Department of Environmental Quality, Cheryl Chubb	Page 14 - V.b - Why is backup power for fixed sirens not a requirement? Should it not be? If sirens do not have backup power, would those sites be required to have backup ANS already? Has a regulation to require backup power ever been pursued?	Noted	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0126-011	Pilgrim Watch, Mary Lampert	Pilgrim Watch disagrees with the draft that says, “Backup power for fixed sirens is not required unless mandated by other regulation or legislative act.” At the General Emergency, NUREG 0654, Supp. 3 calls for State and/or Local Offsite Authority to, “Activate immediate public notification of emergency status and provide public periodic updates,” [Emphasis added.] If fixed sirens do not work and backup coverage “theoretically” can take 45 minutes, public notification cannot be considered to be “immediate.” There is reason for immediacy, defined as within 15 minutes, because the sooner the public knows to take protective actions the greater probability that consequences will be reduced. Prompt notification followed by prompt protective actions during an emergency is central to providing reasonable assurance that public safety will be best protected.	Noted	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.
V. Backup Alert and Notification	FEMA-2008-0022-0126-023	Pilgrim Watch, Mary Lampert	Sirens are important outdoor warning systems and all should be required to have backup power. Pilgrim Watch disagrees with FEMA's draft that says, "Backup power for fixed sirens is not required unless mandated by other regulation or legislative act." At the General Emergency NUREG 0654, Supp. 3 calls for State and/or Local Offsite Authority to, "Activate immediate public notification of emergency status and provide public periodic updates," [Emphasis added.] If fixed sirens do not work and backup coverage "theoretically" can take 45 minutes, public notification cannot be considered to be "immediate." There is reason for immediacy, defined as within 15 minutes, because the sooner the public knows to take protective actions the greater probability that consequences will be reduced. Prompt notification followed by prompt protective actions during an emergency is central to providing reasonable assurance that public safety will be best protected.	Noted	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0117-013	California Emergency Management Agency, Elaine Jennings	Page 14: NUREG-0654/FEMA-REP-1, Appendix 3, Section C.3.g, is revised as shown by adding the underlined text in the following:An independent backup means of public notification is required as stated in section B ofthis Appendix. Backup power for fixed sirens is not required unless mandated by other regulation or legislative act. COMMENTS This addition is not represented in the NRC proposed changes to Appendix E and contradicts the discussion and direction of SECY09-0007.Site routing and backup power were indicated as fulfilling the backup ANS requirement.Delete the second sentence “Backup power for fixed sirens is not required unless mandated by other regulation or legislative act.” ExplanationThe sentence recommended for deletion gives the impression that backup power is not adequate as a backup ANS which is incorrect per the cited sources.	Rejected	Backup power for Alert and Notification Systems (ANS) is a high priority goal and all commercial nuclear licensees are encouraged to implement backup power systems. Most new commercially available siren systems already incorporate battery backup systems. FEMA-REP-10 is currently undergoing revision and will include details on backup power requirements. In the event that the primary ANS system fails, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting.
V. Backup Alert and Notification	FEMA-2008-0022-0078-057	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-92 The guidance should require the utility to annually update the population estimate in the EPZ and conduct a full update of the ETE whenever there is a every five years or when there is a 5% increase in population since the last ETE.	Rejected	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0078-056	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-92 ETE updates should be done every five years or at the request of the state or local authorities based on changes in the EPZ. The current guidance is too subjective and leaves the determination of when to up-date the ETE to the utility regardless of state and local requests. We have just completed an up-date to an ETE and seeing a 27% increase in population at this time. That is too big of an increase in population to be seen between ETE updates.	Noted	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.
V. Backup Alert and Notification	FEMA-2008-0022-0112-005	Harford County Division of Emergency Operations, Linda Ploener	Evacuation Time Estimates: Review and update to the evacuation time estimate studies should be based on each local jurisdiction's population and should not be required "across the board". Also – will it still be the power plant's responsibility to ensure that an updated ETE be completed for each NPP EPZ? The locals should be able to provide population data to their respective NPP to ensure that an ETE be completed when appropriate and not because of a requirement.	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.

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V. Backup Alert and Notification	FEMA-2008-0022-0125-006	Cumberland County Department of Public Safety, Eric Hoerner	NRC 10 CFR Part 50.47(b)(10), Appendix E, Section IV:Require licensees to review and update ETEs periodically and submit to NRC for review and approval. Proposed changes to App. E would provide the required frequency and details of the ETE updates and submissions.Further, NRC has recently concluded that ETE information is important in developing public protective action strategies and should be used to identify improvements to evacuation plans. NRC proposes that population changes of 10% result in updates to the ETE and the updates be completed by 180 days following release of census data.Position/Comment on the Proposed RulemakingETE revision threshold should be presented in guidance not in the Code of Federal Regulation.The threshold should be based on population effect; not just a change in numbers.Cross Cuts ToBasis / CommentDetails of the ETE updates and submissions should be provided in guidance documents. Therefore, future changes to the details of the updates would require revision to guidance documents only, and not require rulemaking.The suggested population sensitivity study alternative supports the assessment of the effect of population change on ETE between decennial Censuses on a site-specific basis, rather than a generic criterion (10% population changeSeveral of the new requirements may be based on inaccurate interpretations of traffic control principles.The language in guidance focuses on high density population areas that is not the norm for the majority of the NPP sites and the respective EPZs	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0042-011	Ned Wright	Page II-92, Line 26: Add "and after the results of a decennial census."	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.
V. Backup Alert and Notification	FEMA-2008-0022-0049-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	ETE updates should be done every three to five years or at the request of the state or local authorities. The current guidance is too subjective and leaves the determination of when to up-date the ETE to the utility regardless of state requests. We have just completed an up-date to an ETE and seeing a 27% increase in population at this time. That is too big of an increase in population to be seen between ETE updates. The guidance should require the utility to annually update the population in the EPZ and conduct a full update of the ETE whenever there is a 5% increase in population since the last ETE.	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0078-007	Minnesota Homeland Security and Emergency Management, kevin Leuer	Criteria for Development of Evacuation Time Estimate Studies (NRC-2008-0122-0013) ETE updates should be done every five years or at the request of the state or local authorities based on changes in the EPZ. The current guidance is too subjective and leaves the determination of when to up-date the ETE to the utility regardless of state and local requests. We have just completed an up-date to an ETE and seeing a 27% increase in population at this time. That is too big of an increase in population to be seen between ETE updates. The guidance should require the utility to annually update the population estimate in the EPZ and conduct a full update of the ETE whenever there is a every five years or when there is a 5% increase in population since the last ETE.	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.
V. Backup Alert and Notification	FEMA-2008-0022-0108-081	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-92 Line: 26-27 Comment: Waiting for a 10% increase of population in an EPZ, is vague and can mean an ETE is not reviewed for significant periods of time. We recommend ETE's be reviewed, minimally, every 10 years using the updated census. Criteria should be more specific for reviews to be performed earlier (i.e., define "significant change"). Although population increase has a much higher impact, significant decreases in population should not be ignored.	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010: The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0120-009	Alabama Emergency Management Agency, La'Tonya Stephens	Page II-92; 26-27 If this increase is based on census information it can take time to compile all the data and to send it out to affected areas. There could be a significant delay in incorporating the population increase into the plans.	Modified	This comment is duplicative of FEMA-2008-0022-0125-6. NRC will respond formally to FEMA-2008-0022-0125-6 on its docket. Draft NRC response as of 1/15/2010:The NRC agrees in part. Current regulations require that applicants and licensees develop ETEs, but there is no requirement to update ETEs on a periodic basis. Current licensee response to guidance regarding ETE updates has been inconsistent and is not enforceable. The NRC believes that a regulatory means of enforcing periodic ETE updates is necessary for consistent implementation. The NRC agrees that ETE updates should be based on the effect that a population change has on the ETE rather than a generic 10 percent population change. The new criteria will specify a population sensitivity study be performed and require an ETE update when the population change causes the ETE to change by 25 percent or 30 minutes, whichever is less. This is in addition to the ETE update after each decennial census.FEMA adds the following response: FEMA does not have authority to regulate utility activities. However, NRC is addressing this issue through current rulemaking. There is a new draft NUREG on ETEs under development, and it will address how often to update. The REP Program Manual will be amended to reflect the new ETE guidance when it is published.
V. Backup Alert and Notification	FEMA-2008-0022-0108-128	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-132 Line: 31-32 Comment: Clearer guidance to indicate 10 CFR 50.54(hh) relates to aircraft threat, explosions and fire would be appreciated.	Noted	**NRC will respond formally to this comment on its docket.** Draft NRC response as of 1/15/2010: The citation has little to do with ORO exercise involvement and need not be included in FEMA guidance. The rule section requires response to aircraft threat and mitigation of loss of large areas due to fire/explosion. However, the rule itself is difficult to paraphrase in simple language as it involves several elements that the NRC wants to see tested over an exercise cycle. Please see the NRC docket for their final response. FEMA adds this response: The cited text has been deleted from Criteron N.1.b.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0130-026	State of Vermont, Barbara Farr	Page 10 section 2: a scenario involving no radiological release or a minimal radiological release that does not require public protective actions shall be utilized in one biennial exercise per cycle to help limit anticipatory response based on the expectation that every exercise will result in a radiological release.BASIS / COMMENTSSuggest including cyber attack as among the possible causative events	Modified	**NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:** Section 73.54 of Title 10 of the Code of Federal Regulations requires nuclear facility licensees to implement a cyber security program that provides high assurance that safety, security, and emergency preparedness functions of nuclear facilities are protected from cyber attacks. Licensee are expected to have a current cyber security program. Additionally, the NRC is providing a method to aid licensees in implementing the rule, by developing Regulatory Guide 5.71, “Cyber Security Program for Nuclear Facilities” and the nuclear power industry indicated that it had voluntarily implemented cyber security programs in accordance with NEI 04-04, “Cyber Security Program for Power Reactors,” at all power reactor sites. These documents provide the licensees with clear expectations on the plans, scope, and definition of cyber hostility. However, it is important to note that computer systems used by licensees operate the reactors and other power reactor safety equipments are isolated against outside intrusion, including the internet. Whereas cyber attacks directed at licensee facilities are associated with digital computer and communication systems and networks, the definition of hostile action defines “an act” associated with individuals who can potentially achieve an end to harm public health and safety through the use of physical violence. The current program defining cyber attacks to licensees is adequately separated from the proposed definition of hostile action attacks, which should not include the cyber component. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0073-066	Washington Military Department Emergency Management Division, Jim Mullen	Page Ref.: III-62Comment: Lines 23-25. Criterion 5.a.3.The paragraph discusses back-up alert and notification of the public yet no reference is made as to what constitutes an approved back-up alert and notification system. In this area, the use of route alerting is not feasible due to limited manpower resources. This is especially true during a Hostile Action-Based incident at a NPP. This area has a very robust ANS that consists of sirens along the river corridor and Tone Alert radios activated using the EAS system within the 10-mile EPZ. All TARs have backup power, as do the sirens and two radio stations/transmitted sites programmed into the radios. The system can be activated by one of two local EOC's or the State EOC; all of which have backup power. The State is upgrading to a digital EAS which would allow remote activation of EAS from any Internet enabled computer. This would seem to circumvent the likelihood of system failure during even the most catastrophic incident.	Noted	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0079-019	Delaware Emergency Management Agency, James Turner	Section III Page 6 Issue: As defined by the NRC, a hostile Action "an act toward an NPP or its personnel that includes the use of violent force to destroy equipment, take hostages and/or intimidate the license to achieve an end. This includes attacks by air, land, or water using guns, explosives, projectiles. Basis/Comment: This comment does not mention cyber attacks, which should be considered among Hostile Actions.	Noted	**NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:**Section 73.54 of Title 10 of the Code of Federal Regulations requires nuclear facility licensees to implement a cyber security program that provides high assurance that safety, security, and emergency preparedness functions of nuclear facilities are protected from cyber attacks. Licensee are expected to have a current cyber security program. Additionally, the NRC is providing a method to aid licensees in implementing the rule, by developing Regulatory Guide 5.71, "Cyber Security Program for Nuclear Facilities" and the nuclear power industry indicated that it had voluntarily implemented cyber security programs in accordance with NEI 04-04, "Cyber Security Program for Power Reactors," at all power reactor sites. These documents provide the licensees with clear expectations on the plans, scope, and definition of cyber hostility. However, it is important to note that computer systems used by licensees operate the reactors and other power reactor safety equipments are isolated against outside intrusion, including the internet. Whereas cyber attacks directed at licensee facilities are associated with digital computer and communication systems and networks, the definition of hostile action defines "an act" associated with individuals who can potentially achieve an end to harm public health and safety through the use of physical violence. The current program defining cyber attacks to licensees is adequately separated from the proposed definition of hostile action attacks, which should not include the cyber component. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0079-022	Delaware Emergency Management Agency, James Turner	Page 10 Section 2 Issue: A scenario involving no radiological release or a minimal radiological release that does not require public protective actions shall be utilized in one biennial exercise per exercise cycle to help limit anticipatory response based on the expectation that every exercise will result in a radiological release. Basis/Comment: Suggest including cyber attack as among the possible causative events.	Modified	**This comment is duplicative of FEMA-2008-0022-0079 -19. NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:** Section 73.54 of Title 10 of the Code of Federal Regulations requires nuclear facility licensees to implement a cyber security program that provides high assurance that safety, security, and emergency preparedness functions of nuclear facilities are protected from cyber attacks. Licensee are expected to have a current cyber security program. Additionally, the NRC is providing a method to aid licensees in implementing the rule, by developing Regulatory Guide 5.71, “Cyber Security Program for Nuclear Facilities” and the nuclear power industry indicated that it had voluntarily implemented cyber security programs in accordance with NEI 04-04, “Cyber Security Program for Power Reactors,” at all power reactor sites. These documents provide the licensees with clear expectations on the plans, scope, and definition of cyber hostility. However, it is important to note that computer systems used by licensees operate the reactors and other power reactor safety equipments are isolated against outside intrusion, including the internet. Whereas cyber attacks directed at licensee facilities are associated with digital computer and communication systems and networks, the definition of hostile action defines “an act” associated with individuals who can potentially achieve an end to harm public health and safety through the use of physical violence. The current program defining cyber attacks to licensees is adequately separated from the proposed definition of hostile action attacks, which should not include the cyber component. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0124-003	Three Mile Island Alert, Scott Portzline	There should be a rule prescribing the timeframe in which a licensee shall determine that a cyber attack has or is occurring. Timely reporting is needed so that the NRC is able to assess if a concerted cyber attack is occurring and then warn other plants and other utility sectors through FEMA and DHS. The NRC ignored our rationale in its analysis of our proposal for its new power reactor security requirements. Emergency preparedness and responses will be delayed without remedying this flaw.	Noted	**This comment is duplicative of FEMA-2008-0022-0079 -19. NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:** Section 73.54 of Title 10 of the Code of Federal Regulations requires nuclear facility licensees to implement a cyber security program that provides high assurance that safety, security, and emergency preparedness functions of nuclear facilities are protected from cyber attacks. Licensee are expected to have a current cyber security program. Additionally, the NRC is providing a method to aid licensees in implementing the rule, by developing Regulatory Guide 5.71, “Cyber Security Program for Nuclear Facilities” and the nuclear power industry indicated that it had voluntarily implemented cyber security programs in accordance with NEI 04-04, “Cyber Security Program for Power Reactors,” at all power reactor sites. These documents provide the licensees with clear expectations on the plans, scope, and definition of cyber hostility. However, it is important to note that computer systems used by licensees operate the reactors and other power reactor safety equipments are isolated against outside intrusion, including the internet. Whereas cyber attacks directed at licensee facilities are associated with digital computer and communication systems and networks, the definition of hostile action defines “an act” associated with individuals who can potentially achieve an end to harm public health and safety through the use of physical violence. The current program defining cyber attacks to licensees is adequately separated from the proposed definition of hostile action attacks, which should not include the cyber component. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0130-023	State of Vermont, Barbara Farr	Section III page 6: As defined by the NRC, a Hostile Action "an act towards an NPP or its personnel that includes the use of violent force to destroy equipment, take hostages and or intimidate the licensee to achieve an end. This includes attacked by air, land, or water using guns, explosives, projectiles"BASIS / COMMENTSNo mention of cyber attacks, which should be under this action too.	Noted	**This comment is duplicative of FEMA-2008-0022-0079 -19. NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:** Section 73.54 of Title 10 of the Code of Federal Regulations requires nuclear facility licensees to implement a cyber security program that provides high assurance that safety, security, and emergency preparedness functions of nuclear facilities are protected from cyber attacks. Licensee are expected to have a current cyber security program. Additionally, the NRC is providing a method to aid licensees in implementing the rule, by developing Regulatory Guide 5.71, "Cyber Security Program for Nuclear Facilities" and the nuclear power industry indicated that it had voluntarily implemented cyber security programs in accordance with NEI 04-04, "Cyber Security Program for Power Reactors," at all power reactor sites. These documents provide the licensees with clear expectations on the plans, scope, and definition of cyber hostility. However, it is important to note that computer systems used by licensees operate the reactors and other power reactor safety equipments are isolated against outside intrusion, including the internet. Whereas cyber attacks directed at licensee facilities are associated with digital computer and communication systems and networks, the definition of hostile action defines "an act" associated with individuals who can potentially achieve an end to harm public health and safety through the use of physical violence. The current program defining cyber attacks to licensees is adequately separated from the proposed definition of hostile action attacks, which should not include the cyber component. **Please see the NRC docket for their final response.**
V. Backup Alert and Notification	FEMA-2008-0022-0044-008	Alliance For A Clean Environment , Lewis Cuthbert	Require back-up batteries for emergency sirens at all nuclear plants.	Rejected	**NRC will respond formally to this comment on its docket.** Draft NRC response as of 1/15/2010: Disagree. Batteries for sirens do not sufficiently address the concern. FEMA adds the following response: Backup power alone is not sufficient for providing a backup for the ANS. NUREG-0654/FEMA-REP-1 Supplement 4 includes a new requirement for backup Alert and Notification System (ANS) capability. In the event of a partial or complete failure in the primary ANS system, due to power outage or any other cause, the licensee is required to have in place a backup ANS. Backup ANS may include systems or a combination of systems such as tone alert radios, NOAA weather radios, reverse 9-1-1, FEMA-approved supplemental systems (e.g., electronic or other advanced technologies), and/or route alerting. Please note that reverse 9-1-1 systems may be used as part of the backup ANS, but may only be used to augment the primary ANS unless otherwise approved by FEMA. Please see the NRC docket for their final response

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0108-016	Louisiana Department of Environmental Quality, Cheryl Chubb	IMS: II-4 Line: 10-11 Comment: Why are the utilities not being required to be NIMS compliant? Everything that NIMS has been designed for requires both A and B to be NIMS compliant to get C. If B is not working with the NIMS/ICS mindset, then A and B never have the opportunity to mesh. For a nuclear power plant event, in order for all parties to work together, the utilities need to be aware of the culture, terminology, etc. Hostile action based drills/exercises should not be required until the utilities are also NIMS compliant and can coordinate effectively with the OROs.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Disagree that utilities must adopt NIMS/ICS to coordinate effectively with OROs, but agree utilities should be familiar with NIMS/ICS terminology and concepts. Please see the NRC docket for their final response.FEMA adds the following response: HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of the OROs (10 CFR 50.47(b)(3) & (b)(6)). The NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately.
V. Backup Alert and Notification	FEMA-2008-0022-0048-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The utilities have not adopted NIMS and are not using NIMS. Without a common framework for incident response and a good understanding of the unified command structure a coordinated on site on response is challenging. The utilities should be required to adopt and implement NIMS just like the offsite response organizations are required to do before these hostile action based drills are required.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Disagree. Section II.1.a. specifically states that "ORO plans shall be compliant with the National Incident Management System (NIMS)," not a requirement for onsite ERO. Please see the NRC docket for their final response.FEMA adds the following response: HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of the OROs (10 CFR 50.47(b)(3) & (b)(6)). The NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0059-001	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	Why are only the ORO plans required to be compliant with NIMS? If the utility plans are not required to be compliant with NIMS there is a disconnect between on-site and off-site planning and response. The whole purpose of having HAB exercise is to ensure the integration of on-site and off-site response so synchronization of response plans is critical.The problem we are encountering is that the utility response and security planning is separated from the general ORO emergency planning at the utility and both plans are counting on the same resources in a response. The force-on-force drills that have been conducted are done out of context of the overall emergency preparedness and response plans. Security plans and general emergency plans are not integrated, not using NIMS and are resulting in the assigning multiple response actives to the same resources.The on-site and off-site security response plans need to be combined into a single all-hazard response plan that can assure that all response functions can be done by the resources that are available. The security plans/procedures should reflect the ECL that would be declared at the time.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:NRC disagrees. NRC's position regarding NIMS/ICS is consistent with HSPD-5 directives to DHS that the program is voluntary for the private sector. NIMS/ICS are designed to aid in domestic incident management activities. Evaluated activities by FEMA and NRC will remain consistent regardless of the use of NIMS/ICS. When the licensees generate or adopt guidance under their emergency plans to address incident management activities, then NRC inspection activities will be in accordance with the NRC rules which do not require the use of specific systems like NIMS/ICS. Since licensees are required to communicate with OROs per 10 CFR 50.47(b)(6), integration of ERO activities with OROs become a reality, regardless of the incident management system in use. NRC has observed several drills that integrated security and EP relatively well and it is expected that the drill and exercise program will improve the early integration seen. If there are site specific integration problems they should be worked out between ORO and licensee. However, NRC would pursue the issue if there is an allegation of inadequacy, but would need to know the specifics to pursue the issue. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). Please see the NRC docket for their final response.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0086-003	Monroe County Office of Emergency Management, Mary Louise Meisenzahl	Part I: Provided background on NIMS management concept; Part II: Revised Evaluation Criterion A.1.a and inserted additional language on NIMS/ICS integration into ORO plans. Revised "Explanation" under each referenced criterion to ensure consistency with NIMS terminology. Comments: We generally agree with the recommendation to have licensees assure that their onsite plans/procedures are integrated with the NIMS-related organizations, response protocols and terminology that would be used during ORO response to onsite hostile action based event. As a minimum, licensee EROs should have a basic awareness of the NIMS/ICS concepts and interfaces needed for timely and effective coordination of onsite response during such events. This recommendation appears to be left as an optional consideration for licensees. We suggest that the language be clarified to require licensees to have a basic working knowledge of NIMS, and to identify primary NIMS-related interfaces between licensees and OROs in the planning for hostile action based events.	Modified	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Agree, except that the NRC should not make the commenter's proposal a "requirement" to licensees. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). The NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. NRC is asking licensees to consider NIMS. When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
V. Backup Alert and Notification	FEMA-2008-0022-0122-015	Emergency Management and Homeland Security Division , James Porcello	The need for the utilities to adopt and implement NIMS/ICS: This is vital as all OROs move to NIMS compliance. As demonstrated in HAB exercises conducted in Michigan, the lack of understanding of the NIMS by utility personnel, especially at the interface point, the Incident Command Post (ICP) has been a critical shortcoming and impediment to successful response.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Agree except that When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0078-030	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-4, lines 24-25 Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. Comments: The utilities have not adopted NIMS and are not using NIMS. Without a common framework for incident response and a good understanding of the unified command structure a coordinated on site on response is challenging.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Disagree with making NIMS/ICS a required framework for licensees to work with OROs, but agree with the need for a common framework for incident response management. Disagree that utilities must adopt NIMS/ICS to coordinate effectively with OROs, but agree utilities should be familiar with NIMS/ICS terminology and concepts. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0078-031	Minnesota Homeland Security and Emergency Management , kevin Leuer	Page II-4, lines 24-25 The utilities should be required to adopt and implement NIMS just like the offsite response organizations are required to do before these hostile action based drills are required	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: Disagree with making NIMS/ICS a required framework for licensees to work with OROs, but agree with the need for a common framework for incident response management. Disagree that utilities must adopt NIMS/ICS to coordinate effectively with OROs, but agree utilities should be familiar with NIMS/ICS terminology and concepts. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.
V. Backup Alert and Notification	FEMA-2008-0022-0101-014	Florida Division of Emergency Management, Michael Younger	Page II-4, lines 24-25 There are many components to NIMS. As a result, it may not be practical for licensees to adopt NIMS nor should licensees be regulated to adopt NIMS. The core concept that licensees should be looking to adopt or implement is an ICS system. In many instances an ICS structure already exists, however it may not use the ICS terminology. Even then, it should be optional for licensees to implement a NIMS compliant ICS system.	Noted	NRC will respond formally to this comment on its docket: Draft NRC response as of 1/15/2010: Agree except that When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Please see the NRC docket for their final response.FEMA adds the following response: FEMA does not have the authority to regulate licensee activities. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. However, the NRC understands that its licensees must coordinate response activities with offsite responders using NIMS/ICS in order to enhance their incident response management. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). When OROs are using NIMS/ICS, then the corresponding licensee should understand NIMS/ICS terminology and methods in order to coordinate and communicate with responders appropriately. Free independent studies are available via FEMA Emergency Management Institute.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0110-005	Alabama Emergency Management Agency, J Frank Price	page II-4, lines 28-34: I agree with making the REP program NIMS and ICS required, but in the NRC document page 23268 section 4 says the NRC is considering the need to integrate NIMS and ICS into licensees EP program. HSPD-5 requires NIMS and ICS and OSHA requires private companies that response to hazardous materials to use ICS and now FEMA is proposing changes to make ICS mandatory for HAB incidents yet utilities are not. The response needs to be consistence.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: NRC disagrees. NRC's position regarding NIMS/ICS is consistent with HSPD-5 directives to DHS that the program is voluntary for the private sector. NIMS/ICS are designed to aid in domestic incident management activities. Evaluated activities by FEMA and NRC will remain consistent regardless of the use of NIMS/ICS. When the licensees generate or adopt guidance under their emergency plans to address incident management activities, then NRC inspection activities will be in accordance with the NRC rules which do not require the use of specific systems like NIMS/ICS. Since licensees are required to communicate with OROs per 10 CFR 50.47(b)(6), integration of ERO activities with OROs become a reality, regardless of the incident management system in use. Please see the NRC docket for their final response.
V. Backup Alert and Notification	FEMA-2008-0022-0103-004	Strategic Teaming and Resource Sharing (STARS), Carl Corbin	STARS believes that NIMS and ICS have an appropriate role in the activities of Federal, State and local law enforcement entities; however, NIMS should not be mandated for onsite command and control structure at nuclear power plants.	Noted	This comment is duplicative of comment FEMA-2008-0022-0048-1. NRC will respond formally to comment FEMA-2008-0022-0048-1 on its docket. Draft NRC response as of 1/15/2010: Section II.1.a. specifically states that "ORO plans shall be compliant with the National Incident Management System (NIMS)," not a requirement for onsite ERO. HSPD-5 applies to governmental entities seeking Federal preparedness grants. Private sector entities, such as NPP licensees, are encouraged, but not required, to adopt NIMS. If there are site specific integration problems they should be worked out between ORO and licensee. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). Please see the NRC docket for their final response.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0078-027	Minnesota Homeland Security and Emergency Management, kevin Leuer	Page II-23, lines 18-19 Security and general emergency response plans need to be integrated in order to have an effective hostile action event response. The current lack of synchronization between these plans has ramifications in a response concerning such things as communications issues and the double counting of resources. There has been no movement to develop an integrated hostile action based response plan, only hostile action based exercises that are not based on any of the off-site organizational response plans.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:Disagree. NRC has observed several drills that integrated security and EP relatively well and it is expected that the drill and exercise program will improve the early integration seen. If there are site specific integration problems they should be worked out between ORO and licensee, However, NRC would pursue the issue if there is an allegation of inadequacy, but would need to know the specifics to pursue the issue. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). In addition, the development of an integrated hostile action-based response plan falls under the purview of each emergency response stakeholder working together with each other to achieve integration. The barriers between interdisciplinary (Federal, State, and local) laws and regulations preclude a single entity to mandate this level of integration, except for the Congress of the United States. Please see the NRC docket for their final response.
V. Backup Alert and Notification	FEMA-2008-0022-0125-010	Cumberland County Department of Public Safety, Eric Hoerner	The existence of “State of Emergency” laws obviates the need for this new criterion [C.6]. After a governor declares a State of Emergency, virtually all State resources are available for response, on a prioritized basis, to a NPP event. Further, many States have entered into regional public safety agency compacts; these agreements facilitate rapid inter-State sharing of public safety resources. There is no need for the NRC, through the licensee, to drive the generation and maintenance of additional MOUs for AORO resources.	Noted	**The NRC will respond formally to this comment on its docket.** Draft NRC response as of 1/15/2010: The NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. The language is broad enough to allow "provisions to enable onsite response support from OROs." MOUs or any other agreements are consequences of reaching out for ownership and partnership to address potential hostile action events at NPPs. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0116-031	Nuclear Energy Institute, Alex Marion	Licensees and OROs should be allowed to verify the availability of alternate ORO resources in a manner consistent with ORO inter-jurisdictional mutual aid/support protocols that are already implemented for all hazards and law enforcement events.	Noted	This comment is duplicative of FEMA-2008-0022-0125-10. NRC will respond formally to FEMA-2008-0022-0125-10 on its docket. Draft NRC reply as of 1/15/2010: The NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. Please see the NRC docket for their final response.
V. Backup Alert and Notification	FEMA-2008-0022-0125-011	Cumberland County Department of Public Safety, Eric Hoerner	Licensees should be allowed to verify the availability of ORO resources in a manner consistent with ORO inter-jurisdictional mutual aid/support protocols that are already implemented for all hazards and law enforcement events.	Noted	**The NRC will respond formally to this comment on its docket.** Draft NRC response as of 1/15/2010: The NRC recognizes that its licensees' membership in their community makes them dependent on the infrastructure, jurisdictions, and laws pertaining to their resident States and counties. This membership gives licensees certain rights which allow them to reach out to available ORO resources similarly to any industrial complex in their State or county. The fact that licensees reach out to ORO resources (besides using their own resources) via agreements only emphasizes their proactive posture to address their relevant needs regarding response to incidents at their sites. Maintaining such agreements are in the best interest of licensees and the health and safety of their community, which are direct requirements under the Code of Federal Regulations. The NRC and FEMA should continue to urge OROs and licensees to pursue and maintain current their agreements as stated in Section III of the proposed Supplement 4 to NUREG-0654/FEMA-REP-1. **Please see the NRC docket for their final response.**

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V. Backup Alert and Notification	FEMA-2008-0022-0050-004	Minnesota Homeland Security and Emergency Management, Kevin Charles Leuer	The utility security plans/procedures are not coordinated and integrated with the emergency preparedness plans/procedures within the utility. The utilities emergency planning folks need to be better integrated into the security planning. Currently there are security plans and emergency plans for the utility which are not coordinated internally at the utility level or with the off-site agencies. Because the security and general emergency plans are not synchronized they currently double count resources. Without integrated planning first we cannot successfully conduct hostile action drills with on-site and off-site response agencies simultaneously based on the ECL that would be declared during a security event.	Noted	NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: NRC disagrees. NRC's position regarding NIMS/ICS is consistent with HSPD-5 directives to DHS that the program is voluntary for the private sector. NIMS/ICS are designed to aid in domestic incident management activities. Evaluated activities by FEMA and NRC will remain consistent regardless of the use of NIMS/ICS. When the licensees generate or adopt guidance under their emergency plans to address incident management activities, then NRC inspection activities will be in accordance with the NRC rules which do not require the use of specific systems like NIMS/ICS. Since licensees are required to communicate with OROs per 10 CFR 50.47(b)(6), integration of ERO activities with OROs become a reality, regardless of the incident management system in use. In addition, NRC has observed several drills that integrated security and EP relatively well and it is expected that the drill and exercise program will improve the early integration seen. If there are site specific integration problems they should be worked out between ORO and licensee. However, NRC would pursue the issue if there is an allegation of inadequacy, but would need to know the specifics to pursue the issue. The burden is upon the licensees to ensure that their programs are integrated appropriately with those of OROs (10 CFR 50.47(b)(3) & (b)(6)). Please see the NRC docket for their final response.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0125-003	Cumberland County Department of Public Safety, Eric Hoerner	10CFR Part 50, Appendix E, Section IV.A.7, Draft NRC Interim Staff Guidance (NSIR/DPR-ISG-01):The NRC rulemaking contains statements of consideration for Offsite Response Organizations that include: a hostile action based event will place additional and different demands on local law enforcement agencies and fire departments. The rule requires licensees to coordinate with OROs to ensure resources are available.One example, Verification of mutual aid agreements, including rosters, training records, Position/Comment on the Proposed RulemakingThe extent of “ORO coordination”. The potential impact here is setting public safety agencies up for evaluation of the adequacy of mutual aid resources and the redundancy and potential for conflicts with Annual Letters of Certification submittals. Further, would additional REP training be required of mutual aid out side of the EPZ? Sections of the ISG on page 19 where the paragraph starts off with “OROs should …..” should be deleted. Sections of the ISG on page 19 and 20 that require the licensee to verify ORO program elements should be modified or deleted,Cross Cuts ToREP Program Manual,NUREG 0654, Supp. 4, Section IIIBasis / CommentBased on our evaluation, we see that day-to-day public safety functions could potentially be evaluated under the REP umbrella as well as redundant regulation and evaluation by both FEMA and the NRC.	Noted	**NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010:** The final rule is being modified to state that: "Identification of, and assistance expected from, appropriate State, local, and Federal agencies with responsibilities for coping with emergencies, including a hostile action event at the site..." By inserting the inclusion of "hostile action" and in accordance to current language of Appendix E, Sections IV.A.6-8, it should be clear that "assistance expected from, appropriate State, local, and Federal agencies will be identified." Licensees are currently required to demonstrate compliance associated with ORO personnel assigned to emergency plan implementation duties and the final rule will add the "hostile action" component to it. The ISG should reflect this change. **Please see the NRC docket for their final response.**

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0125-004a	Cumberland County Department of Public Safety, Eric Hoerner	NRC 10 CFR Part 50, Appendix E, Section IV.D.3, Draft NRC Interim Staff Guidance (NSIR/DPR-ISG-01):Adding a requirement to provide a backup capability to the primary alert and notification systems (ANS)Position/Comment on the Proposed RulemakingThe Alert and Notification rulemaking area requires each site to identify, in the event of a siren malfunction, a backup method. Some sites already commit to a backup in their plans, route alerting. NRC stated in the public meetings that route alerting implements the rule. Some sites have robust siren systems with independent backup activation and sufficient back up power capabilities. And, according to SECY09-0007, these are acceptable and yet the language in the ISG is creating new requirements that go beyond the rule language.Delete the 45 minute requirement.Cross Cuts ToREP Program Manual,NUREG 0654, Supp. 4, Section IV Basis / CommentWith the proposed language, a robust primary ANS is not being credited by the NRC and may in fact discourage capital or other improvements to primary ANS.	Rejected	The NRC will respond formally to this comment on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.
V. Backup Alert and Notification	FEMA-2008-0022-0125-004b	Cumberland County Department of Public Safety, Eric Hoerner	(continued)The FRN states: “Guidance would be provided for determining the acceptability of the backup methods based on the alerting and notification capabilities of the methods selected, administrative provisions for implementing and maintaining backup methods, identification of resources to implement backup methods, and periodic demonstration of the backup methods.” A review of rulemaking documentation does not provide a clear picture of the expectations for backup notification. It appears that NRC is not following the direction of the Executive Branch.The proposed rule does not recognize current directives at the federal level to develop comprehensive emergency alert and notification systems that utilize a wide range of technologies to disseminate alerts and notification messages for diverse conditions and events – missing children, local weather hazards, mass casualty situations. These technologies can be utilized for supplemental nuclear power plant emergency alerting and notification purposes, and would be more effective than single purpose methods developed solely for nuclear power plant emergencies.		

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V. Backup Alert and Notification	FEMA-2008-0022-0125-004b	Cumberland County Department of Public Safety, Eric Hoerner	(continued) A case in point is the FEMA Integrated Public Alert and Warning System (IPAWS). The vision of IPAWS builds and maintains an effective, reliable, integrated, flexible and comprehensive system that enables the public to receive alert and warning information through as many means as possible.conditions and events – missing children, local weather hazards, mass casualty situations. These technologies can be utilized for supplemental nuclear power plant emergency alerting and notification purposes, and would be more effective than single purpose methods developed solely for nuclear power plant emergencies. A case in point is the FEMA Integrated Public Alert and Warning System (IPAWS). The vision of IPAWS builds and maintains an effective, reliable, integrated, flexible and comprehensive system that enables the public to receive alert and warning information through as many means as possible.		
V. Backup Alert and Notification	FEMA-2008-0022-0097-091	San Onofre Nuclear Generating Station (SONGS) Interjurisdictional Planning Committee (IPC), Mike Rose	Credit should be granted to robust siren systems and other methods that are employed for public notification particularly the alternate methods that are used in day-to-day public safety events and lessen the focus on route alerting.	Rejected	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

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V. Backup Alert and Notification	FEMA-2008-0022-0020-059	Ashtabula County EMA, George Rolland	REP Program Manual, NUREG 0654, Supp. 4, Section IV Basis/ Comment: With the proposed language, a robust primary ANS is not being credited by the NRC and may in fact discourage capital or other improvements to primary ANS. The FRN states: "Guidance would be provided for determining the acceptability of the backup methods based on the alerting and notification capabilities of the methods selected, administrative provisions for implementing and maintaining backup methods, identification of resources to implement backup methods, and periodic demonstration of the backup methods." A review of rulemaking documentation does not provide a clear picture of the expectations for backup notification.	Rejected	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.
V. Backup Alert and Notification	FEMA-2008-0022-0073-087	Washington Military Department Emergency Management Division, Jim Mullen	That said, we recommend allowing an exception for systems that can adequately document the robustness of it's system.Potential Impact: Backup route alerting is not always an option for jurisdictions with very limited manpower resources. Use of an ANS with multiple redundancies should be able to alert and notify essentially all of the 10mile EPZ even during the most catastrophic incidents.	Noted	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

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V. Backup Alert and Notification	FEMA-2008-0022-0116-045	Nuclear Energy Institute, Alex Marion	As it stands now, the only direction the requirement for a backup means seems to be going is to require route alerting in addition to siren systems. Credit should be granted to robust siren systems and other methods that are employed for public notification particularly the alternate methods that are used in day-to-day public safety events and lessen the focus on route alerting.	Rejected	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

Topic	Docket ID	Organization	Comment Text	Disposition	Adjudication Rationale
V. Backup Alert and Notification	FEMA-2008-0022-0073-001	Washington Military Department Emergency Management Division, Jim Mullen	Document: NUREG-0654 SUPP. 4Page Ref: p. 14Comment: Section V.b. of the Supplement discusses a change to Appendix 3, Section C.3.g. in that an "independent backup means of public notification is required as stated in Section B of this Appendix." The State and locals were confused about what the intent of the change really means. It appears that the intent of the regulation means that there must be a completely separate "backup" ANS that meets the requirements of FEMA-REP-10 Rev 1. This seems to be an extraordinary measure to mandate for all commercial nuclear power plants. The State and locals feel that the system in place in our area is very robust (multiple activation points as well as backup power at the origination, transmission, and receiving locations.) If the current ANS was good enough to meet the requirements of FEMA-REP-10 Rev. 1, then what assurances are there that the "backup" system would not be vulnerable to the same problems that affect the primary system? In other words, what is the criteria for an acceptable backup ANS other than what is stated in FEMA-REP-10 Rev. 1?Potential Impact: There will be a substantial financial impact on the licensee as well as additional training, planning, and procedural modifications on the State and Locals. Recommend modifying the requirement to state that the backup system is required only if the licensee cannot demonstrate that the system in place provides a level of flexibility and robustness that precludes the likelihood of failure.Comment By:	Noted	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse “range of technologies” to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

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V. Backup Alert and Notification	FEMA-2008-0022-0116-013	Nuclear Energy Institute, Alex Marion	NEI is concerned that the proposed ANS implementing guidance would not credit a licensee's ANS system that is designed such that no single point-of-failure would preclude successful alerting and notification. Common system attributes include multiple and independent activation points, backup power sources, overlapping acoustical coverage, multiple broadcast stations, etc. This type of robust ANS can complete alerting and notification functions more effectively than a backup ANS. The guidance may also have the unintended consequence of discouraging licensees from upgrading to higher quality ANS systems by diverting resources to, and/or increasing reliance upon, a backup means that, in the end, would be a less effective in protecting public health and safety. For these reasons, NEI recommends that the guidance be revised to include a set of ANS design criteria or attributes that, if met by a site's ANS configuration, would obviate the need for a backup ANS. This approach would be consistent with the ANS rulemaking discussion presented in SECY-09-0007.	Noted	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse "range of technologies" to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.
V. Backup Alert and Notification	FEMA-2008-0022-0125-005a	Cumberland County Department of Public Safety, Eric Hoerner	NRC 10 CFR Part 50, Appendix E, Section IV.D.3, Draft NRC Interim Staff Guidance (NSIR/DPR-ISG-01):Adding a requirement to provide a backup capability to the primary alert and notification systems (ANS)Position/Comment on the Proposed RulemakingThe Alert and Notification rulemaking area requires each site to identify, in the event of a siren malfunction, a backup method. Some sites already commit to a backup in their plans, route alerting. NRC stated in the public meetings that route alerting implements the rule. Some sites have robust siren systems with independent backup activation and sufficient back up power capabilities. And, according to SECY09-0007, these are acceptable and yet the language in the ISG is creating new requirements that go beyond the rule language.Delete the 45 minute requirement.Cross Cuts ToREP Program Manual,NUREG 0654, Supp. 4, Section IV Basis / CommentWith the proposed language, a robust primary ANS is not being credited by the NRC and may in fact discourage capital or other improvements to primary ANS.	Rejected	This comment is duplicative of FEMA-2008-0022-0125-4. NRC will respond formally to FEMA-2008-0022-0125-4 on its docket. Draft NRC response as of 1/15/2010: The staff does not agree as NRC is responsible for promulgating and enforcing regulations that protect public health and safety during the operation of nuclear power plants. The NRC has determined that regulations are necessary to ensure consistent implementation of public alert and notification capabilities at all nuclear plants. Route alerting is currently widely used to accomplish this end. However, the proposed rule does not prohibit a diverse "range of technologies" to be used to meet the requirements. When the ongoing Federal initiatives to improve the emergency notification of the public reach maturity and are implemented in the environs of nuclear plants, the NRC would consider alternative means to meet the requirement. However, NRC has not seen a proposal for the design of an adequate backup ANS system, but would remain open to consideration should such a proposal be received. Please see the NRC docket for their final response.FEMA adds the following response: OROs may apply for approval of alternate means of meeting regulatory requirements for backup ANS systems through the process explained in the REP Program Manual, Part I, Section 3.d.

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V. Backup Alert and Notification	FEMA-2008-0022-0125-005b	Cumberland County Department of Public Safety, Eric Hoerner	(Continued)The FRN states: "Guidance would be provided for determining the acceptability of the backup methods based on the alerting and notification capabilities of the methods selected, administrative provisions for implementing and maintaining backup methods, identification of resources to implement backup methods, and periodic demonstration of the backup methods." A review of rulemaking documentation does not provide a clear picture of the expectations for backup notification. It appears that NRC is not following the direction of the Executive Branch.The proposed rule does not recognize current directives at the federal level to develop comprehensive emergency alert and notification systems that utilize a wide range of technologies to disseminate alerts and notification messages for diverse conditions and events – missing children, local weather hazards, mass casualty situations. These technologies can be utilized for supplemental nuclear power plant emergency alerting and notification purposes, and would be more effective than single purpose methods developed solely for nuclear power plant emergencies. A case in point is the FEMA Integrated Public Alert and Warning System (IPAWS). The vision of IPAWS builds and maintains an effective, reliable, integrated, flexible and comprehensive system that enables the public to receive alert and warning information through as many means as possible.		