



# **Standard Operating Procedure and Guidelines**

**For the New Reactor Combined License Application**

**October 10, 2008  
Revision 4.1**



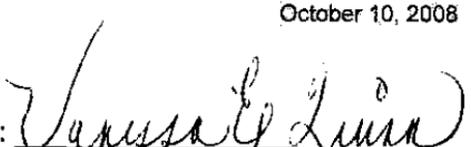
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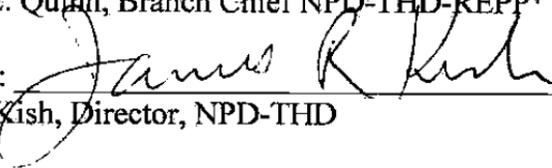


**Radiological Emergency Preparedness Program  
Standard Operating Procedure and Guidelines for  
New Reactor Combined License Application**

October 10, 2008

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# **Standard Operating Procedure and Guidelines for New Reactor Combined License Application**

**This document is written to guide activities for personnel assigned to the  
Federal Emergency Management Agency Radiological Emergency  
Preparedness Headquarters, and Regions,**

**Quality reviews included members from the following agencies:  
Federal Emergency Management Agency,  
U.S. Nuclear Regulatory Commission,**

**Revisions will be made as conditions warrant.**

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## A. Foreword

On December 7, 1979, the President directed the Federal Emergency Management Agency (FEMA) to assume the lead responsibility for all offsite nuclear planning and response. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) parts 350 through 353. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Power Plant (NPP) Station accident in March 1979.

FEMA Rule 44 CFR 350-353 establishes the policies and procedures for FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State, Tribal, and local government participation in joint exercises with licensees.

Suggested changes or questions regarding this document should be directed to the FEMA New Reactor Team at:

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## B. Introduction

FEMA has entered into a Memorandum of Understanding (MOU) with the U.S. Nuclear Regulatory Commission (NRC) as stated in 44 CFR 353 appendix A. FEMA agreed to furnish assessments, findings, and determinations as to whether State, Tribal, and local emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment adequacy). These findings and determinations are used by the NRC under its own rules in connection with its licensing and regulatory requirements and FEMA supports its findings in the NRC licensing process and related court proceedings as outlined in 44 CFR 350.3(f).

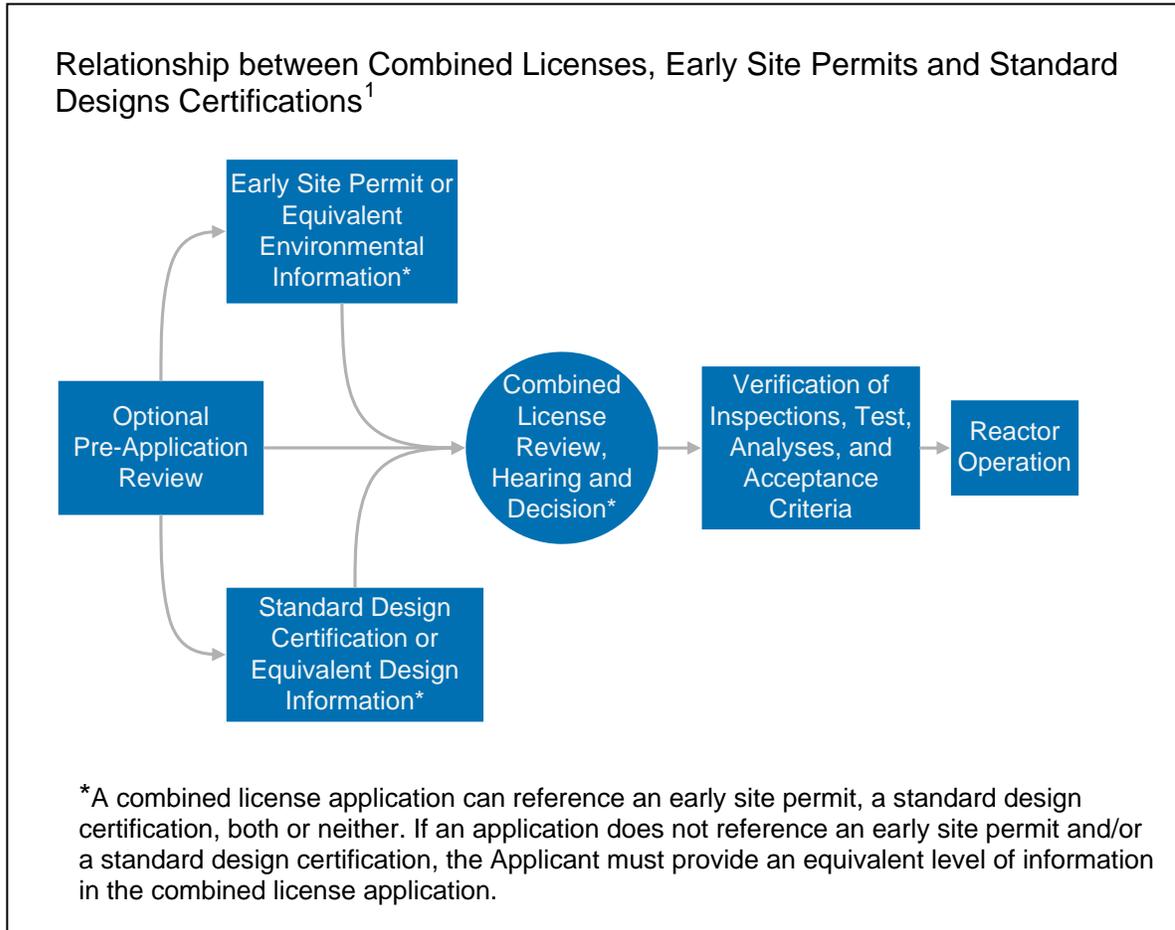
FEMA is involved in approximately seventeen to eighteen months of the Combined License process using the sixteen planning standards for safety that are reviewed for new construction nuclear power plants. FEMA only reviews fifteen of the sixteen planning standards, which are comprised of one hundred nine detailed criteria (NUREG-0654 FEMA-REP-1, Rev. 1).

FEMA's responsibilities with respect to offsite radiological emergency preparedness are specified as:

- Take the lead during the review and assessment of adequate offsite emergency plans and preparedness.
- Determine whether plans and procedures can be implemented based on analyzing plans and observing the effectiveness of plans through the evaluation of exercises conducted by State, Tribal, and local governments in conjunction with licensee's and the NRC.
- Respond to requests by the NRC pursuant to the MOU between the NRC and FEMA (44 CFR 353 Appendix A).

The NRC and FEMA Headquarters (HQ) work together alongside the FEMA Regions, the NRC Regions, States, Tribal, local governments, and organizations to help facilitate the process for the new reactor licensing for established sites that have operating reactors and sites that currently do not have an operating reactor.

The process for licensing a nuclear power plant has several options (Early Site Permit, Standard Design Certification, and Combined License).



<sup>1</sup> Source: U.S. NRC

## C. Purpose

The purpose of this document is to describe FEMA's responsibility in supporting the Combined License (COL) application process for new reactors and to provide an understanding and guidance in the review process from the earliest letter or memo to the completion of the Interim Finding Report (IFR).

## D. Rules

**Delays:** Any delays during the review that may accrue from an outside factor should be noted on the tracking form (See Appendix 5 and 6) and a letter should be sent to FEMA HQ within twenty four (24) hours. HQ will then forward the information to the NRC. For example, if the Applicant takes more than five (5) days to respond to your communication, then notify HQ.

**Extensions:** Extensions to the review process must be requested in writing to FEMA HQ no later than ten (10) days prior to the Regional suspense date. The request must detail the reason for the extension and provide a proposed completion date. The request will be reviewed by FEMA HQ and coordinated with NRC.

## E. Plant Site Situations

There are three (3) types of situations for new reactors where the FEMA review of offsite radiological emergency preparedness will be required. This helps FEMA review the applications more consistently, in order for an interim finding to be given more quickly.

Situation 1 Interim Finding Report	Situation 2 Interim Finding Report	Situation 3 Interim Finding Report
<p>A request to build a new reactor at an operating commercial NPP.</p> <p>In this case, State, Tribal, and local REP plans, equipment, and training programs already exist. An IFR will be developed reflecting the current REP program for the offsite jurisdiction(s). It also reflects any identified shortfalls of the proposed REP plans that may exist.</p> <p>(44 CFR 353 Appendix A)</p>	<p>A request to build a new reactor at a non operating site within a State or Tribal Nation that already has at least one operating commercial NPP.</p> <p>In this case, State and Tribal plans already exist, but there is a need to refine the State’s plan to be specific for the proposed NPP. Plans and procedures and training will need to be developed for jurisdictions that do not have an operating commercial nuclear power plant. An IFR with Schedule of Requirements for Reasonable Assurance delineating milestones for preparation of the county plans during the post-licensing period will be part of the IFR.</p> <p>(44 CFR 353 Appendix A)</p>	<p>A request to build a new reactor in a State or Tribal Nation with no operating commercial NPP.</p> <p>In this case, there are no existing State and local plans. Equipment and training programs would require significant development in order to meet regulating criteria. In this case, a Schedule of Requirements for Reasonable Assurance delineating milestones for preparation of the State and county plans during the post-licensing period will be part of the IFR.</p> <p>(44 CFR 353 Appendix A)</p>

## F. Responsibilities

### ***FEMA Headquarters***

FEMA Headquarters personnel have primary responsibility for the overall review of materials related to the proposed licensing of a new reactor. FEMA Headquarters New Reactors Team staff will:

- Update and maintain the master schedule for all of the new reactor applications as information is obtained from the NRC. Distribute to the Regions, emphasizing all changes that have occurred since last revision.
- Track progress of all Regional review activities. Communicate with Regions on status of their reviews weekly.
- Review all documents and correspondence submitted by the Regions in support of new reactor reviews. Clarify any RAIs prior to drafting management correspondence to the NRC.
- Research and respond to questions from the Regions regarding FEMA regulations and other concerns that require interpretation from the Office of Chief Counsel.

### ***FEMA Regions***

FEMA Regional personnel have primary responsibility for the detailed review of materials related to the proposed licensing of a new reactor. The Regions have planning and preparedness expertise and operational relationships with the State, Tribal, and local governments making them the subject matter experts in the field. FEMA Regional staff will:

- FEMA Regions conduct a conference call with FEMA HQ, Applicant and State to discuss steps that need to be taken by all parties to meet the Acceptance Review and Phase I deadlines.
- Distribute copies of plans and supporting procedures to the Regional Assistance Committee (RAC) for their review.
- Establish a timeline for the review and RAC meeting to discuss the plan review.
- Coordinate with affected State, Tribal, and local governments as appropriate.
- Conduct RAC meeting to reach consensus on the findings and determinations made in the plan review.
- Submit the appropriate Interim Finding Reports to FEMA HQ.
- Generate sufficient background documentation to enable any FEMA representative at a future time (such as at a public hearing) to substantiate review findings.

## G. Acceptance Review

The purpose of the Acceptance Review is to ensure the application is sufficient for FEMA to start the Phase I review with current State, Tribal, and local plans that have been submitted along with the appropriate NUREG-0654 FEMA-REP-1, Rev. 1 cross-reference.

- As soon as the Region is aware that an application is expected, they should begin collecting implementing procedures and the all-hazards plans for affected jurisdictions.
- The Acceptance Review process begins when the Applicant submits a COL application to the NRC. The NRC has sixty (60) days to determine if the COL application is sufficient for full licensing review.
- As part of the NRCs Acceptance Review process, the NRC forwards an official acceptance request letter to FEMA HQ (courtesy copied to respective FEMA Regions). FEMA HQ confirms tasking in writing to affected Regions.
- Upon receipt of the above information, the FEMA Region has thirteen (13) working days, within the NRC Acceptance Review sixty (60) working days, to review the State, Tribal, and local government offsite radiological emergency response plans as well as NUREG-0654 FEMA-REP-1 Rev. 1 cross-references for completeness.
  - The NRC regulation, 10 CFR 50, requires the Applicant to submit current State REP plans within the 50-mile Emergency Planning Zone (EPZ) and county/local plans within the 10-mile EPZ. If these items are included with the application material, the application is considered acceptable.
    - If the application is for a non-operating site (Situation 2 and 3), the Applicant is required to develop and submit proposed REP plans for jurisdictions within the 10-mile EPZ and 50-mile EPZ of the site.
  - In order to accurately determine whether the plans can be implemented, FEMA may also need the all-hazard emergency plans (if the REP is not a self contained document) and implementing procedures to conduct its review. These additional documents should be requested directly from the states and not requested in the Acceptance Review letter.
- FEMA HQ provides the NRC with a letter informing them whether or not the offsite information provided by the Applicant is acceptable. If the information is not acceptable, the Applicant will be informed to supply the FEMA Region with the requested information.

- Maximize the use of federal personnel to conduct the required review and necessary coordination. Federal employees should be supplemented by contractual assistance only on a case-by-case basis. If contractor support is needed, FEMA HQ shall develop the work order.
- Upon completion of the NRC sixty (60) day Acceptance Review period, the NRC will evaluate all input (internal and external) in order to evaluate and confirm that the application material is complete and correct. This will occur before the NRCs decision to docket, or formally accept, the application.
- After the FEMA Region reviews the application materials, a letter is forwarded to the FEMA HQ REP Branch Chief stating if the application is acceptable.
- Once the application is docketed, a number is assigned to it and the NRC gives FEMA HQ an official letter and schedule to guide the COL process, thus becoming a legal document.
- Following a successful Acceptance Review and docketing, Phase I begins. FEMA HQ will confirm this task in writing to affected FEMA Regions.
- There are two (2) COL process lengths:
  - A six (6) phase application process; in which FEMA is involved in Phases I, II, and IV, but may assist the NRC in other phases.
  - A four (4) phase application process; in which FEMA is involved in Phases I and II, but may assist the NRC in other phases.

**NOTE:** If the application is a non-operating site (Situation 2 or Situation 3), the Region should begin the Phase I Review process as soon as possible to incorporate the allocated one hundred twenty (120) working days for Phase I.

### ***Project Details and Responsibilities***

The FEMA Region reviews the submitted material determining whether it is sufficient for a plan review to begin.

(See Appendix 1 for insufficient review and Appendix 2 for sufficient review sample letters.)

#### **Deliverable FEMA Region:**

Acceptance Review Transmittal Memorandum

MEMORANDUM FOR: REP Branch Chief, FEMA Headquarters

FROM: Technological Hazards Branch Chief, FEMA Region

SUBJECT: Acceptance Review of Offsite Radiological Emergency Response Plans for the \_\_\_\_\_ Site, Combined License Application

In the letter, one of the following must be identified<sup>2</sup>:

- Material is sufficient to allow FEMA to begin its review
- Material is not sufficient and the following information is required before FEMA can begin its review
  - Provide a list of needed material
  - FEMA HQ forwards information to the NRC, who informs the Applicant that the document is considered incomplete until the missing information is provided.
  - The schedule does not start until a complete application is received.

**NOTE:** When reviewing plans for non-operating sites, ensure that the county plans submitted on the Applicant's disc are reviewed. These plans may incorporate NUREG-0654 FEMA-REP-1, Rev. 1.

**Deliverable FEMA Headquarters:**

Acceptance Review Letter

Generate a letter to the NRC for Acceptance Review from the REP Branch Chief to the NRC Licensing and Inspection Branch Chief. This letter should include a statement as to whether FEMA agrees with proposed schedule durations.

Letter Routing

Follow HQ correspondence procedures to ensure proper routing, concurrence, and signatures.

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<sup>2</sup> 44 CFR 353 Appendix A

## H. Section 1 – Six Phase Process

The Six phase process is used for COL applications with a reactor design that has not been previously certified by the NRC. As of December 2008 the following COL applications are following the six phase process:

**Bellefonte**  
**Calvert Cliffs**  
**Comanche Peak**  
**North Anna**  
**South Texas Project**

<b>COL Process</b>	<b>FEMA Deliverable</b>	<b>Duration</b>
<b>Acceptance Review</b>	<b>Review Letter</b>	<b>13 Working Days</b>
<b>Phase I</b>	<b>IFR for Requests for Additional Information</b>	<b>90 Working Days</b>
		<b>120 Working Days</b>
<b>Phase II</b>	<b>IFR for Open Items</b>	<b>30 Working Days</b>
<b>Phase III</b>	<b>Tentative Support</b>	<b>2 Days</b>
<b>Phase IV</b>	<b>IFR for Reasonable Assurance</b>	<b>30 Working Days</b>
<b>Phase V</b>	<b>Tentative Support</b>	<b>2 Days</b>
<b>Phase VI</b>	<b>Tentative Support</b>	<b>31 Working Days</b>
<b>Hearings</b>	<b>Testimony as Needed</b>	<b>Throughout Project as Needed</b>
<b>Post COL</b>	<b>IFR on Preparedness</b>	<b>After Qualifying Exercise</b>

## ***Phase I – Interim Finding Report for Requests for Additional Information***

Ninety (90) working days are allocated for this phase for Situation 1 sites. One hundred twenty (120) working days are allocated for non-operating sites for this phase. Non-operating sites will need to begin the Phase I review as soon as the FEMA Acceptance Review is complete. This will allow for the one hundred twenty (120) working days on Phase I, by combining thirty (30) working days from the post Acceptance Review and the ninety (90) working days allocated for Phase I.

This phase begins after the NRC docket the application materials or as established by the site-specific schedule. Phase I ends with the issuance of the final IFR for Requests for Additional Information (RAIs).

FEMA Role: Review offsite emergency response plans to determine if all NUREG-0654 FEMA-REP-1, Rev.1 criterions are addressed adequately.

An IFR is described in the FEMA/NRC MOU, 44 CFR 353 Appendix A. It is developed by reviewing the plans and procedures of State, Tribal, and local governments which are responsible for a NPP offsite response.

The purpose of the IFR for RAIs is to define gaps in planning, equipment, and training that must be filled before final reasonable assurance can be granted.

## **Project Details and Responsibilities**

### **Deliverables FEMA Region:**

IFR for RAIs  
Final RAIs

### **Deliverable FEMA Headquarters:**

IFR for RAIs sent to the Applicant and the NRC

The FEMA Region will submit draft RAIs to FEMA HQ at bi-weekly intervals during this phase. Then the FEMA Region will submit the IFR for RAIs and a separate final RAI report to FEMA HQ for review ten (10) working days prior to the end of Phase I. The separate RAI report is necessary because the Applicant only receives the RAI document without the Interim Finding Report. FEMA HQ will submit a letter containing the RAI report to the Applicant prior to the end of Phase I.

**NOTE:** The FEMA IFR description of offsite preparedness provides a detailed summary of actions that must be completed before a proposed reactor will be authorized and operated. This includes the review of Phase I which becomes a part of the NRC Preliminary Safety Evaluation Report (PSER).

## Composing the Interim Finding Report

The IFR must be clear and concise. Keep these items in mind during your preparation of the report.

- RAIs and Schedule of Requirements for Reasonable Assurance are used outside the context of the report and must make sense on their own.
- The review is for offsite response organization emergency plans. FEMA does not review the Applicant's onsite emergency response plans, unless the onsite emergency response plan impacts offsite emergency response.
- Note that the IFR is a summary document and the Regions should produce a preliminary review document containing sufficient details about the plan material to support the rating each criterion is given. This document is not a deliverable, but should be kept on file at the Region in the event that FEMA is asked to justify its conclusions during the licensing hearing or any other time.
- There will be two (2) deliverables produced:
  - Interim Finding Report
  - RAIs
- If more than one State is involved in a review, only one report is produced.
- Identify one of the following conditions for each evaluation criterion and each planning standard in the report:
  - **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
  - **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
  - **Inadequate:** Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.
  - **N/A:** The planning criterion is not applicable to this Offsite Response Organization (ORO).

## Interim Finding Conditions with Examples

<p><b>Adequate</b></p> <p>Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.</p>	<p><b>NUREG 0654 EXAMPLE:</b></p> <p>J.10.a Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p> <p>Plan includes all these requirements.</p>
<p><b>Adequate - Corrections Must Be Made</b></p> <p>Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).</p>	<p><b>NUREG 0654 EXAMPLE:</b></p> <p>J.10.a Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p> <p>Plan has maps, but missing evacuation route.</p>
<p><b>Inadequate</b></p> <p>Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.</p>	<p><b>NUREG 0654 EXAMPLE:</b></p> <p>J.10.a Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p> <p>Plan has EPZ map but none of the other required maps.</p>

**The Interim Finding Report Sections:** (See Appendix 10 for an example report)

Executive Summary – Description of the circumstances of the application and the proposed site, the plans reviewed, and the condition for each planning standard.

I. Introduction

- A. General Characteristics of the Plant – Include information about the site, its distance from major landmarks and cities, a listing of the States and jurisdictions within the 10-mile and 50-mile EPZ, and the name of the Applicant.
- B. Emergency Response Organizations
  - i. Describe relevant authorities from the State and Local plans.
  - ii. Describe the concept of operations for overall emergency management and coordination.
  - iii. Cite the responsible organization for coordinating State, local, private, and volunteer organizations and coordination with federal response elements.
  - iv. List organizations and relationships within the State with responsibilities related to radiological emergency planning and response. Ensure accident assessment, radiation monitoring, health hazards, and protective action guidelines are discussed.
- C. Plans – This section encompasses all plans reviewed. It includes how the State and local plans are organized, the number of volumes and the overall content of the volumes, including a list with the full name and publication date of each plan.
- D. Basis for Findings – Discuss the critical elements cited above (and any previously unmentioned items) that form the basis for the determination. List key elements, and cite specific coordination used to derive the finding.
- E. Evaluation Format – In accordance with the MOU the NRC and FEMA agreed to furnish assessments, findings and determinations as to whether State, Tribal, and local emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment adequacy). These findings and determinations are used by the NRC under its own rules in connection with its licensing and regulatory requirements and FEMA supports its findings in the NRC licensing process and related court proceedings 44 CFR 350.3(f).

II. Review and Evaluation of Emergency Preparedness Plans

- A. This section contains specific information on each criterion reviewed, grouped by planning standard.
  - i. For each planning standard, open with a clear statement of the overall condition of the planning standard (Adequate, Adequate – corrections must be made, or Inadequate) and the number of criteria in each

category. Please note that any criteria addressed in the Schedule of Pending Actions should have a rating of “Adequate – corrections must be made”. (See Schedule of Pending Actions below)

- ii. Briefly describe all of the adequate evaluation criteria for the planning standard.
- iii. For the IFR for OIs and IFR for Reasonable Assurance, describe any criteria that have changed to adequate and the actions that resolved the respective RAIs and OIs.
- iv. Briefly describe each of the remaining criteria in order, identify the condition, and summarize the information needed to change that criterion to an adequate condition.

### III. Schedules

- A. Pending Actions – This section tracks administrative items that are scheduled for completion as part of regular periodic activities, but will occur after FEMA’s review process is completed. These only apply to existing REP plans, and would represent the final step in resolving an RAI. Pending actions must have a specific scheduled completion date. For example, corrections to address an RAI have been made to a Local plan but the official signature on the revisions is scheduled to occur during the annual plan update.
- B. Requirements for Reasonable Assurance
  - i. For Situation 2 and 3 sites, the Schedule of Requirements for Reasonable Assurance contains items that cannot reasonably be addressed in new plans until the post-licensing period, when support agreements between response organizations have been finalized and facilities have been built or identified.
  - ii. When a new reactor is built at a new site, some or all of the municipalities within the new site’s EPZ will not have existing radiological emergency plans. FEMA works with these municipalities, who must adopt and complete the proposed plans prepared by the utility, develop detailed procedures, and train responders prior to conducting the qualifying joint exercise. (See Appendix 11 and 12)
  - iii. Other than the qualifying exercise, items on this schedule apply primarily to new REP plans.

IV. Review Composite Rating Summary – This section consists of a table showing each NUREG-0654 FEMA-REP-1, Rev. 1 criterion reviewed and the corresponding condition (Adequate, Adequate – corrections must be made, or Inadequate).

V. Requests for Additional Information or Open Items – This section consists of a table of all draft and final RAIs or OIs in numerical order. The table describes the information required to bring the criterion to an adequate condition, as well as the actual resolution of the item.

### VI. Acronym Key

**IFR for RAIs Outline:**

Executive Summary

- I. Introduction
  - A. General Characteristics
  - B. Emergency Response Organizations
  - C. Plans
  - D. Basis for the findings:
    - i. 44 CFR part 353
    - ii. Guidance Memoranda
    - iii. NUREG-0654 FEMA-REP-1, Rev. 1
  - E. Evaluation Format
  
- II. Interim Findings of the Review of Evaluation of Emergency Preparedness Plans
  - A. NUREG-0654 Planning Standards A – P
  - B. Identify one of the following conditions for each criterion and each planning standard in the report:
    - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
    - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
    - iii. **Inadequate:** Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.
    - iv. **N/A:** The planning criterion is not applicable to this ORO.
  
- III. Schedule of Pending Actions/Requirements for Reasonable Assurance
  
- IV. Review Composite Summary

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Inadequate	C.1.c.	Adequ/Corr
A.1.c.	Adequate	A.3.	Inadequate	C.2.a.	Adequ/Corr
A.1.d.	Adequ/Corr	A.4.	Adequ/Corr	C.2.b.	Adequ/Corr

V. Requests for Additional Information - A separate document containing only the RAIs also must be submitted.

VI. Acronym Key

## Letters and Memoranda for Submittal

### FEMA Region

MEMORANDUM FOR: Chief, Radiological Emergency Preparedness Branch  
FROM: Chief, Technological Hazards Branch, FEMA Region  
SUBJECT: Interim Finding Report for Request for Additional Information

Content:

Identify the request for Interim Finding from the NRC, stating what plans/procedures were used in the finding. Also, identify State, Tribal, and local government's plans and procedures by publication date.

Include basis for the findings citing:  
NUREG 0654 FEMA-REP-1 Rev 1  
Guidance Memoranda  
44 CFR part 350 - 354

### FEMA HQ 1

Create cover letter to the NRC for IFR for RAIs (See Appendix 3 for sample letter)

To: Chief, Licensing and Inspection Branch, NRC  
From: Chief, Radiological Emergency Preparedness Branch, FEMA

Identify the request for Interim Finding from the NRC, stating what plans and procedures were used in the finding. Also, identify State, Tribal, and local governments and the plans and procedures by publication date.

Include basis for the findings citing:  
NUREG 0654/FEMA-REP-1 Rev 1  
Guidance Memoranda  
44 CFR part 350 – 354

This letter will be courtesy copied to the respective FEMA Region.

### FEMA HQ 2

Create cover letter to the Applicant for the Final RAIs

To: Applicant Point of Contact (See Appendix 13)  
From: Chief, Radiological Emergency Preparedness Branch, FEMA  
Ref: FEMA Final Request for Additional Information of the Offsite Emergency Response Plans for the Combined License

Explain that in accordance with the current RAI process, the Applicant should review all of the enclosed RAIs and respond with the information or updates within forty-five (45) working days of the date of the letter.

This letter will be courtesy copied to the NRC and to the respective FEMA Region.

## RAI Process

The RAI process was developed during a public meeting with Nuclear Energy Institute, the NRC, and FEMA. This process was agreed upon and must be followed.

### Tools for the RAI process:

Purpose of these documents is for the Region to keep track of all RAIs until they are all corrected and to note phone calls related to the COL process. These documents should be kept on file for the final hearings.

- Appendix 4 – RAI Submittal Format
- Appendix 5 – Operating Site RAI Tracking Form
- Appendix 6 – Non-Operating Site RAI Tracking Form
- Appendix 9 – Direct Discussion Form

### *Acceptance Review*

- Step 1: The COL Application including offsite planning documents are submitted to the NRC.
  
- Step 2: The NRC forwards the offsite plans to FEMA HQ and the respective FEMA Region.

### *Phase I*

- Step 3: The FEMA Region reviews the offsite plans to validate them in accordance with all one hundred and nine (109) criteria in NUREG-0654 FEMA-REP-1, Rev. 1.
  
- Step 4: The FEMA Region reviewer contacts the Applicant and FEMA HQ ***BI-WEEKLY*** with a list of verbal questions regarding information shortfalls. The FEMA Regions should maintain logs of all conversations concerning RAIs, and record them on the Direct Discussion Form (See Appendix 9). The Applicant will coordinate answers with State, Tribal, and local agencies as appropriate. The purpose of this step is to verbally resolve as many information shortfalls as possible prior to establishing draft RAIs.

**NOTE:** Send a group e-mail or set up a conference call with the Applicant, the State, Tribal, and local governments notifying them of an impending letter from the FEMA Region referencing all RAIs. The RAI letter will request that when the State responds to the RAIs they will need to send a courtesy copy to the Applicant and the NRC. The Applicant's licensing contact will be courtesy copied. Questions will be directed to the NRC Project Manager. Any information shortfalls that were corrected immediately by the Applicant will be stated as such with the correction in the IFR.

- Step 5: After the reviewer determines that the unresolved verbal questions will become a draft RAI, it needs to be submitted to FEMA HQ as soon as possible. The FEMA Region develops draft RAIs. Do not wait until the RAIs have accumulated because it will overwhelm the Applicant and FEMA HQ causing a backlog.
- Step 6: FEMA HQ receives the draft RAIs and reviews them for consensus.
- Step 7: FEMA HQ sends the draft RAIs to the Applicant who forwards the draft RAIs to State, Tribal, and local government, as appropriate. FEMA HQ also sends a copy to the NRC for docketing.
- Step 8: FEMA HQ and the FEMA Region discuss draft RAIs with the Applicant, State, Tribal, and local government, and if needed with the NRC. This should lead to final RAIs which are clear, understandable, and attainable. (See below for samples of poorly written vs. clearly written RAIs)
- Step 9: The FEMA Region submits the IFR for RAIs to FEMA HQ for concurrence; FEMA HQ then sends the report to the NRC for docketing. FEMA HQ also sends the final RAIs to the Applicant who forwards them to State, Tribal, and local government, as appropriate.

*End of Phase I*

- Step 10: The Applicant addresses the final RAIs with the State, Tribal, and local governments and then submits responses to FEMA HQ/Regions and the NRC within the below allotted timeframes:
- Operating Site - 45 working days
  - Non Operating Site - 60 working days

The Applicant will submit RAI responses from State, Tribal, and local governments' to the appropriate FEMA Regions, within three days of receipt.

**NOTE:** Any RAI that the State refuses to answer or cannot answer will be directed to the NRC and Applicant for their review.

*Phase II*

- Step 11: FEMA HQ forwards the RAI responses and Phase II tasking to the affected FEMA Regions.

## RAI Development

In order for RAIs to be clear, understandable, and attainable, they must contain:

- A specific description of the information required in the NUREG-0654 criterion that is in error, insufficient, or missing entirely from the plan
- The plan section that requires correction
- A statement of the action that must be taken to bring the plan condition to adequate using the language of the NUREG-0654 criterion

The following are examples of poorly written RAIs and clear, understandable, and attainable RAIs.

### Evaluation Criterion A.3:

- Poor: The State of Zstate Radiological Emergency Response Plans (RERP) lists two Memoranda of Understanding. There are no agreements for hospitals, transportation providers, radiological monitoring personnel, etc. Provide these agreements.
- Clear: The State of Zstate RERP, Volume III, Basic Plan, Appendix 1, *Supporting Plans, Memoranda of Understanding, Standing Operating Procedures and Public Affairs Publications*, lists two Memoranda of Understanding. Required written agreements (such as those for hospitals, transportation providers, radiological monitoring personnel, etc.) are not included. Provide the written agreements either in an appendix or described in the plan and verified with signature pages.

### Evaluation Criterion C.3:

- Poor: The State of Zstate RERP and the Zstate Department of Health/Division of Radiological Health Emergency Response Plans do not include information about the general capabilities and expected availability of the laboratories named.
- Clear: A.1 The State of Zstate RERP, Appendix 2, Section I.C, *Task Assignments, Division of Consolidated Laboratory Services*, states that the Consolidated Laboratory Services will provide emergency laboratory services to State agencies and political subdivisions. However, the capabilities and expected availability of the laboratory are not specified. Provide information about the general capabilities and expected availability of the Division of Consolidated Laboratory Services to provide analysis services.
- A.2 The State of Zstate RERP, Annex H, ESF #8, Tab B, *Public Health and Medical Services, Radiological Laboratories* lists secondary laboratories at the Medical College of Zstate and the University of Zstate Medical Center. However, the capabilities and

expected availability of the secondary laboratories are not specified. Provide information about the general capabilities and expected availability of the secondary laboratories to provide analysis services.

A.3 The Zstate Department of Health/Division of Radiological Health ERP, Appendix 5, Section 2.2.3.3, *Accident Assessment*, states that laboratory services will be provided by their own mobile laboratory or by the Consolidated Laboratory. However, the capabilities and expected availability of the laboratory are not specified. Provide information about the general capabilities and expected availability of the laboratories providing analysis services.

## **RAI vs. Requirements for Reasonable Assurance**

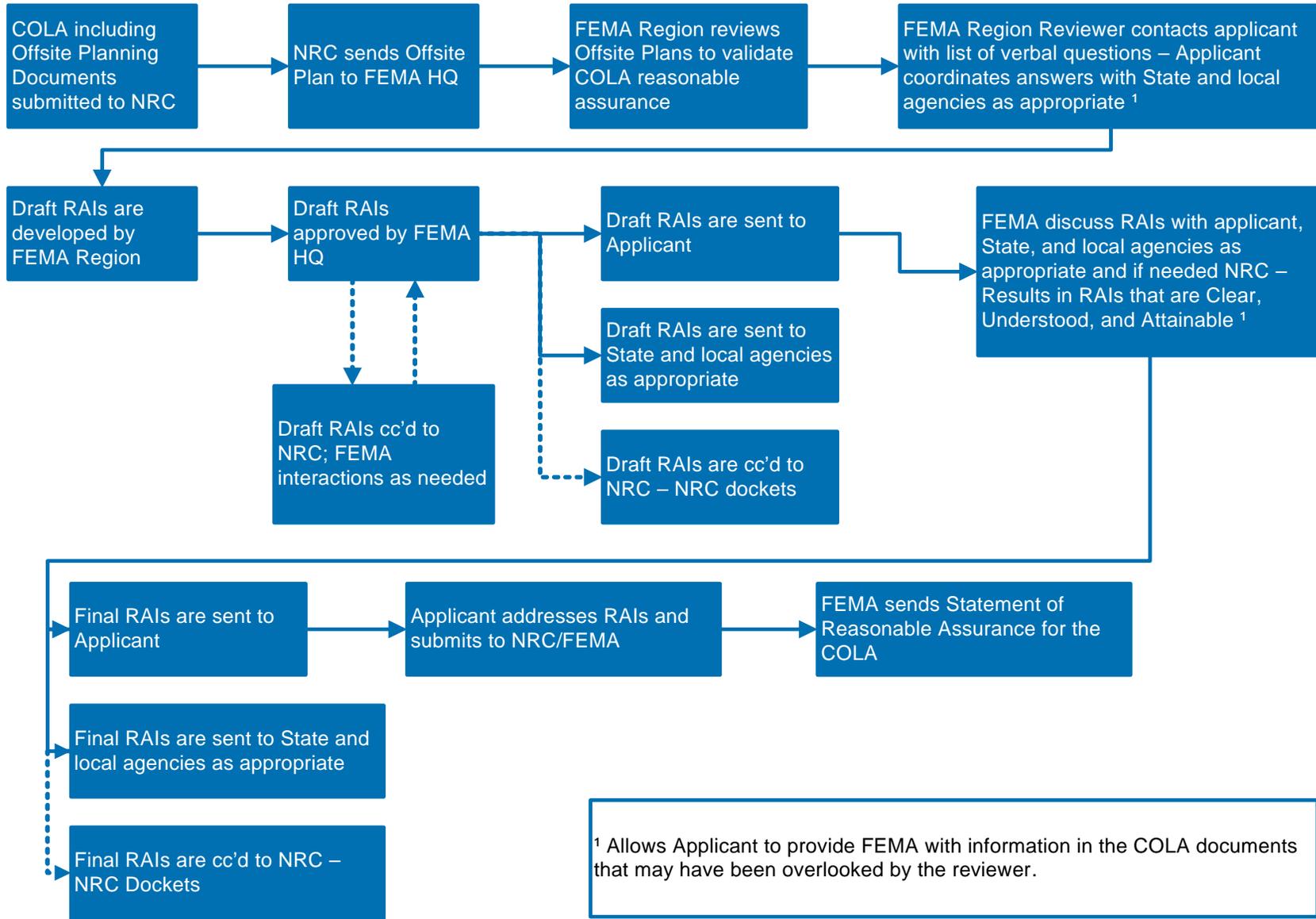
Given that operational NPPs have demonstrated planning and preparedness competency through initial and ongoing Reasonable Assurance reviews, Situation 1 sites should not have any items on the Schedule of Pending Actions other than the qualifying exercise for the new reactor. This is because State, Tribal, and local plans have already been developed for the operating reactor(s) and demonstrated through exercises. Modification to plan information, and any needed demonstrated competencies for these sites is handled through the RAI process and will be resolved before the new reactor license is issued.

For Situation 2 or 3 sites, reviewers must determine whether missing information should be handled through an RAI or the Schedule of Requirements for Reasonable Assurance. The deciding factor is whether the information can reasonably be finalized during the pre-licensing stage. Incomplete plan information that is dependent on support agreements, facilities, or equipment that do not yet exist is documented in the Schedule of Requirements for Reasonable Assurance and completed during the post-licensing period. These decisions must be discussed with affected jurisdictions and licensees during the plan review cycle using the RAI process.

The IFR for Situation 2 sites will contain a mixture of RAIs and Requirements for Reasonable Assurance. The State plans will need to be modified to include information relevant to the new site. Plan omissions that can be corrected by amending the existing or proposed plans should be handled through RAIs. Plan omissions that are dependent on things that do not exist yet should be documented as Requirements for Reasonable Assurance. The majority of incomplete items in the proposed local plans will be Requirements for Reasonable Assurance if those jurisdictions have never had REP plans before.

If the proposed plans for a Situation 3 site are as complete as possible in the pre-licensing period, the IFR might not contain any RAIs at all, but only Requirements for Reasonable Assurance.

## RAI Flowchart



<sup>1</sup> Allows Applicant to provide FEMA with information in the COLA documents that may have been overlooked by the reviewer.

## **Phase II – Interim Finding Report for Open Items**

Thirty (30) working days are allocated for this phase.

Phase II begins with the receipt of the Applicant's final Phase I RAI responses. The Applicant will submit RAI responses from State, Tribal, and local governments' to the FEMA Region and HQ, within three days of receipt.

FEMA Role: Review Phase I RAIs to determine what remains unresolved. Any unanswered RAIs are converted into OIs that form the basis for the Phase II IFR for OIs.

**NOTE:** FEMA does not review the Applicant's onsite emergency response plans unless the onsite emergency response plan impacts offsite emergency response. This action will have twenty (20) working days to complete this task in addition to the thirty (30) working days allowed for the phase.

"For modeling purposes, Phase I and Phase II are treated as occurring sequentially. However, since the Applicant's RAI responses may be received before the completion of Phase I, Phase II could actually run concurrently with the later part of Phase I."<sup>3</sup>

### **Deliverables FEMA Region:**

IFR for OIs  
OIs

### **Deliverables FEMA Headquarters:**

IFR for OIs sent to the NRC  
OIs sent to the Applicant

Complete an updated IFR that identifies remaining OIs based on review of information provided from the Applicant's response to Phase I RAIs.

The FEMA Region will submit the IFR for OIs and a separate final OI report to FEMA HQ for review ten (10) working days prior to the end of Phase II. FEMA HQ will submit a letter containing the OI report to the Applicant prior to the end of Phase II.

(See Appendix 8 for OI format)

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<sup>3</sup> NRC letter dated December 20, 2007, to Dennis Schrader, Deputy Administrator

**IFR for OIs Outline:**  
Executive Summary

I. Introduction

- A. General Characteristics
- B. Emergency Response Organizations
- C. Plans
- D. Basis for the findings:
  - i. 44 CFR part 353
  - ii. Guidance Memoranda
  - iii. NUREG-0654 FEMA-REP-1, Rev. 1
- E. Evaluation Format

II. Interim Finding of the Review of Evaluation of Emergency Preparedness Plans

- A. NUREG-0654 Planning Standards A – P
- B. Identify one of the following conditions for each criterion and each planning standard in the report:
  - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
  - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
  - iii. **Inadequate:** Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.

III. Schedule of Pending Actions or Requirements for Reasonable Assurance

IV. Review Composite Summary

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequ/Corr	C.1.c.	Adequ/Corr
A.1.c.	Adequate	A.3.	Adequ/Corr	C.2.a.	Adequ/Corr

- V. Open Items - A separate document containing only the OIs also must be submitted. (See Appendix 8)

VI. Acronym Key

## Letters and Memoranda for Submittal

### FEMA Region

MEMORANDUM FOR: Chief, Radiological Emergency Preparedness Branch  
FROM: Chief, Technological Hazards Branch, FEMA Region  
SUBJECT: Interim Finding Report for Open Items

#### Content:

Identify the request for Interim Finding from the NRC, stating what plans or procedures were used in the finding. Also, identify State, Tribal, and local government's plans and procedures by publication date. Identify how many open items there are and expected date of finalization.

Include basis for the findings citing:  
NUREG 0654/FEMA-REP-1 Rev 1  
Guidance Memoranda  
44 CFR part 350 - 354

### FEMA HQ 1

Create cover letter to the NRC for IFR for OIs (See Appendix 7 for sample letter)

To: Chief, Licensing and Inspection Branch, NRC  
From: Chief, Radiological Emergency Preparedness Branch, FEMA

Identify the request for Interim Finding from the NRC, stating what plans or procedures were used in the finding. Also, identify State, Tribal, and local government's plans and procedures by publication date. Identify how many open items there are and expected date of finalization.

Include your basis for the findings citing:  
NUREG 0654 FEMA-REP-1 Rev 1  
Guidance Memoranda  
44 CFR part 350 – 354

This letter will be courtesy copied to the respective FEMA Region.

### FEMA HQ 2

Create cover letter to the Applicant for the OIs

To: Applicant Point of Contact (See Appendix 13)  
From: Chief, Radiological Emergency Preparedness Branch, FEMA  
Ref: FEMA Open Items Concerning Offsite Emergency Response Plans for the Combined License for (name of site).

Explain that in accordance with the current OI process, the Applicant should review all of the enclosed OIs and respond with the information or updates within thirty (30) working days of the date of the letter.

This letter will be courtesy copied to the NRC and to the respective FEMA Region.

### ***Phase III – Review of Safety Evaluation Report***

FEMA is not directly involved in Phase III but could be called upon by the NRC for consultation or review of offsite plans.

## ***Phase IV – Interim Finding Report for Reasonable Assurance***

Thirty (30) working days allocated for this phase.

This phase begins upon receipt of the Applicant's responses to the Phase II OIs. FEMA will receive the Applicants responses to OIs from the NRC within three days of the Applicant's response being available to the NRC. The duration, for FEMA purposes, starts on the date of receipt of the Applicant's OI response from the NRC. FEMA HQ sends a letter to the FEMA Region (courtesy copied to the NRC) notifying them to begin Phase IV.

FEMA Role: Review Applicant's proposed resolutions to any OI pertaining to REP offsite issues and finalize the IFR.

**NOTE:** "An Interim Finding based only on the review of currently available offsite plans will include an assessment as to whether these plans are adequate when measured against the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1, and, pending a demonstration through an exercise, whether there is reasonable assurance that the plans can be implemented."<sup>4</sup>

All OIs should be resolved at the conclusion of Phase IV.

### **Deliverable FEMA Region:**

IFR for RA

### **Deliverables FEMA Headquarters:**

IFR for RA sent to the Applicant and the NRC

This report constitutes an assessment of offsite planning and characterizes preparedness related tasks and conditions that must be completed or met in order to operate the proposed plant. The report is based on plans measured against standards identified in NUREG-0654 FEMA-REP-1, Rev. 1.

For Situation 1 sites, all OIs should be resolved and the plans addressing all planning standards and evaluation criteria should be fully Adequate or placed on the Schedule of Pending Actions. For example, when the Applicant responds within the required thirty (30) working days addressing the OIs they will not be submitting any supporting documents because of the phase-in of 2009/2010 plan changes, but only a letter stating what action they are taking to correct the OIs. For Situation 2 and 3 sites, evaluation criteria with elements addressed in the Schedule of Requirements for Reasonable Assurance should be described as Adequate – corrections must be made. All other evaluation criteria should be fully Adequate.

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<sup>4</sup> 44 CFR 353 Appendix A

The FEMA Region will submit an IFR for Reasonable Assurance to FEMA HQ ten (10) working days prior to the end of the Phase IV. FEMA HQ will submit the IFR for Reasonable Assurance to the NRC prior to the end of Phase IV.

**IFR for Reasonable Assurance Outline:**

Executive Summary

- I. Introduction
  - A. General Characteristics
  - B. Emergency Response Organizations
  - C. Plans
  - D. Basis for the findings:
    - i. 44 CFR part 353
    - ii. Guidance Memoranda
    - iii. NUREG-0654 FEMA-REP-1, Rev. 1
  - E. Evaluation Format
  
- II. Interim Finding of the Review of Evaluation of Emergency Preparedness Plans
  - A. NUREG-0654 Planning Standards A – P
  - B. Identify one of the following conditions for each criterion and each planning standard in the report:
    - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
    - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
  
- III. Schedule of Pending Actions or Requirements for Reasonable Assurance
  - A. 44 CFR 353, Appendix A, part II.2 states that if the plans submitted are not complete (e.g., Situation 3 Site), then a Requirement for Reasonable Assurance is required. It will delineate milestones for preparation of the plan by the offsite authorities as well as FEMA’s actions to assist in timely development and review of the plans. FEMA has determined that the Requirements for Reasonable Assurance will be incorporated into the IFR within Section III.

IV. Review Composite Summary

A. Situation 1 Sites

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequate	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequate	C.1.c.	Adequate

A.1.c.	Adequate	A.3.	Adequate	C.2.a.	Adequate
A.1.d.	Adequate	A.4.	Adequate	C.2.b.	Adequate
A.1.e.	Adequate	C.1.a.	Adequate	C.3.	Adequate

B. Situation 2 and 3 Sites

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequ/Corr	C.1.c.	Adequate
A.1.c.	Adequate	A.3.	Adequ/Corr	C.2.a.	Adequ/Corr
A.1.d.	Adequate	A.4.	Adequate	C.2.b.	Adequ/Corr
A.1.e.	Adequate	C.1.a.	Adequate	C.3.	Adequ/Corr

V. Acronym Key

**Letters and Memoranda for Submittal**

**FEMA Region**

MEMORANDUM FOR: Chief, Radiological Emergency Preparedness Branch  
 FROM: Chief, Technological Hazards Branch, FEMA Region  
 SUBJECT: Interim Finding Report for Reasonable Assurance

Content:

Identify the request for Interim Finding from the NRC, stating what plans or procedures were used in the finding. Also, identify State, Tribal, and local government’s and the plans and procedures by publication date.

Include basis for the findings citing:  
 NUREG 0654FEMA-REP-1 Rev 1  
 Guidance Memoranda  
 44 CFR part 350 - 354

“An Interim Finding based on the review of the currently available offsite plans will include an assessment as to whether these plans are adequate when measured against the standards and criteria of NUREG 0654FEMA-REP-1 and pending a demonstration through an exercise, whether there is reasonable assurance that the plans can be implemented<sup>5</sup>.”

**FEMA HQ**

Create cover letter to the NRC for IFR for Reasonable Assurance

<sup>5</sup> MOU between FEMA and the NRC

To: Chief, Licensing and Inspection Branch, NRC  
From: Chief, Radiological Emergency Preparedness Branch, FEMA

Identify the request for Interim Finding from the NRC, stating what plans or procedures were used in the finding. Also, identify State, Tribal, and local government's plans and procedures by publication date.

Include basis for the findings citing:  
NUREG 0654/FEMA-REP-1 Rev 1  
Guidance Memoranda  
44 CFR part 350 – 354

The plans are adequate when measured against the standards and criteria of NUREG 0654 FEMA-REP-1 and pending a demonstration through an exercise, whether there is reasonable assurance that the plans can be implemented.

This letter will be courtesy copied to the respective FEMA Region.

### ***Phase V – Review of Safety Evaluation Report***

Two (2) working days allocated for this phase.

Advisory Committee on Reactor Safety (ACRS) reviews the Safety Evaluation Report (SER). FEMA is not directly involved in Phase V, but could be called upon by the NRC for consultation or review of offsite plans.

### ***Phase VI – Final Review of Safety Evaluation Report***

Thirty-one (31) working days allocated for this phase.

This phase is primarily internal to the NRC for the final review editing and management concurrence of the Final SER. FEMA support would be requested for any changes that will impact FEMA's final report.

## I. Section 2 – Four Phase Process

The four phase process is used for applications containing a previously certified reactor design by the NRC. As of December 2008, the following COL applications are following the four phase process:

**Bell Bend  
 Calloway  
 Fermi 3  
 Grand Gulf  
 Lee  
 Levy County**

**Nine Mile Point  
 River Bend  
 Shearon Harris  
 Summer  
 Victoria  
 Vogtle**

<b>COL Process</b>	<b>FEMA Deliverable</b>	<b>Duration</b>
<b>Acceptance Review</b>	<b>Review Letter</b>	<b>13 Working Days</b>
<b>Phase I – Part A</b>	<b>IFR for Requests for Additional Information</b>	<b>90 Working Days</b>
		<b>120 Working Days</b>
<b>Phase I – Part B</b>	<b>IFR for Open Items</b>	<b>30 Days</b>
<b>Phase II</b>	<b>IFR for Reasonable Assurance</b>	<b>30 Working Days</b>
<b>Phase III</b>	<b>Tentative Support</b>	<b>2 Days</b>
<b>Phase IV</b>	<b>Tentative Support</b>	<b>31 Days</b>
<b>Hearings</b>	<b>Testimony as Needed</b>	<b>Throughout Project As Needed</b>
<b>Post COL</b>	<b>IFR on Preparedness</b>	<b>After Qualifying Exercise</b>

## **Phase I: Part A and Part B**

### **Part A**

#### **Interim Finding Report for Requests for Additional Information**

Ninety (90) working days are allocated for operating sites for this phase. One hundred twenty (120) working days are allocated for non-operating sites for this phase. Non-operating sites will use the thirty (30) working days for Acceptance Review combined with the ninety (90) working days allocated for Phase I.

This phase begins after the NRC docket the application materials or as established by the site-specific schedule. Part A ends with the issuance of the final IFR for RAIs.

FEMA Role: Review offsite emergency response plans to determine if all NUREG-0654 FEMA-REP-1, Rev.1 criteria are addressed adequately.

An IFR is described in the FEMA/NRC MOU, 44 CFR 353 Appendix A. It is developed by reviewing the plans and procedures of State, Tribal, and local governments are responsible for a NPP offsite response.

The purpose of the IFR for RAIs is to define gaps in planning, equipment, and training that must be filled before final reasonable assurance can be granted.

#### **Deliverables FEMA Region:**

IFR for RAIs  
Final RAIs

#### **Deliverables FEMA Headquarters:**

IFR for RAIs sent to the Applicant and the NRC

The FEMA Region will contact FEMA HQ with an update of draft RAIs at bi-weekly intervals during this phase. Then the FEMA Region will submit the IFR for RAIs report to FEMA HQ for review ten (10) working days prior to the end of Part A. FEMA HQ will submit a letter containing the RAI report to the Applicant prior to the end of Part A.

**NOTE:** The FEMA IFR description of offsite preparedness provides a detailed summary of actions that must be completed before a proposed reactor will be authorized and operated. This includes the review of Part A which becomes a part of the NRC PSER.

**IFR for RAIs Outline:**

Executive Summary

- I. Introduction
  - A. General Characteristics
  - B. Emergency Response Organizations
  - C. Plans
  - D. Basis for the findings:
    - i. 44 CFR part 353
    - ii. Guidance Memoranda
    - iii. NUREG-0654 FEMA-REP-1, Rev. 1
  - E. Evaluation Format
  
- II. Interim Findings of the Review of Evaluation of Emergency Preparedness Plans
  - A. NUREG-0654 Planning Standards A – P
  - B. Identify one of the following conditions for each criterion and each planning standard in the report:
    - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
    - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
    - iii. **Inadequate:** Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.
    - iv. **N/A:** The planning criterion is not applicable to this ORO.
  
- III. Schedule of Pending Actions/Requirements for Reasonable Assurance
  
- IV. Review Composite Summary

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Inadequate	C.1.c.	Adequ/Corr
A.1.c.	Adequate	A.3.	Inadequate	C.2.a.	Adequ/Corr
A.1.d.	Adequ/Corr	A.4.	Adequ/Corr	C.2.b.	Adequ/Corr

V. Requests for Additional Information - A separate document containing only the RAIs also must be submitted.(See Appendix 4)

VI. Acronym Key

**NOTE:** Follow the Letters and Memoranda for Submittal process found in the Six Phase – Phase I process.

**Part B**  
**Interim Finding Report for Open Items**

Thirty (30) working days are allocated for this phase.

Part B begins with the receipt of the Applicant's Part A RAI responses. FEMA will receive the Applicant's responses to RAIs from the NRC within three days of the Applicant's response being available to the NRC.

FEMA Role: Review Part A RAIs to determine what remains unresolved. Any unanswered RAIs are converted into OIs that form the basis for the Part B IFR for OIs.

**NOTE:** FEMA does not review the Applicant's onsite emergency response plans unless the onsite emergency response plan impacts offsite emergency response. This action will have twenty (20) working days to complete this task in addition to the thirty (30) working days allowed for the phase.

**Deliverables FEMA Region:**

IFR for OIs  
OIs

**Deliverables FEMA Headquarters:**

IFR for OIs sent to the NRC  
OIs sent to the Applicant

Complete an updated IFR that identifies remaining OIs based on review of information provided by the Applicant's response to Part A RAIs.

Then the Region will submit the IFR for OIs to FEMA HQ for review ten (10) working days prior to the end of Part B. FEMA HQ will submit a letter containing the OI report to the Applicant prior to the end of Part B.

(See Appendix 8 for OI format)

**IFR for OIs Outline:**

Executive Summary

I. Introduction

- A. General Characteristics
- B. Emergency Response Organizations
- C. Plans
- D. Basis for the findings:
  - i. 44 CFR part 353
  - ii. Guidance Memoranda
  - iii. NUREG-0654 FEMA-REP-1, Rev. 1
- E. Evaluation Format

II. Interim Finding of the Review of Evaluation of Emergency Preparedness Plans

- A. NUREG-0654 Planning Standards A – P
- B. Identify one of the following conditions for each criterion and each planning standard in the report:
  - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
  - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).

III. Schedule of Pending Actions or Requirements for Reasonable Assurance

IV. Review Composite Summary

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequ/Corr	C.1.c.	Adequ/Corr
A.1.c.	Adequate	A.3.	Adequ/Corr	C.2.a.	Adequ/Corr

V. Open Items - A separate document containing only the OIs also must be submitted. (See Appendix 8)

VI. Acronym Key

**NOTE:** Follow the Letters and Memoranda for Submittal process found in the Six Phase – Phase II process.

## ***Phase II – Interim Finding Report for Reasonable Assurance***

Thirty (30) working days allocated for this phase.

This phase begins upon receipt of the Applicant's responses to the Phase I OIs. FEMA will receive the Applicants responses to OIs from the NRC within three days of the Applicant's response being available to the NRC. The duration, for FEMA purposes, starts on the date of receipt of the Applicant's OI response from the NRC.

FEMA Role: Review Applicant's proposed resolutions to any OI pertaining to REP offsite issues and finalize the IFR for Reasonable Assurance.

**NOTE:** "An Interim Finding based only on the review of currently available offsite plans will include an assessment as to whether these plans are adequate when measured against the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1, and, pending a demonstration through an exercise, whether there is reasonable assurance that the plans can be implemented."<sup>6</sup>

All OIs should be resolved at the conclusion of Phase II.

### **Deliverable FEMA Region:**

IFR for RA

### **Deliverables FEMA Headquarters:**

IFR for RA sent to the Applicant and the NRC

This report constitutes an assessment of offsite planning and characterizes preparedness related tasks and conditions that must be completed or met in order to operate the proposed plant. The report is based on plans measured against standards identified in NUREG-0654 FEMA-REP-1, Rev. 1.

For Situation 1 sites, all OIs should be resolved and the plans addressing all planning standards and evaluation criteria should be fully Adequate or placed on the Schedule of Pending Actions. For example, when the Applicant responds within the required thirty (30) working days addressing the OIs they will not be submitting any supporting documents because of the phase-in of 2009/2010 plan changes, but only a letter stating what action they are taking to correct the OIs. For Situation 2 and 3 sites, evaluation criteria with elements addressed in the Schedule of Requirements for Reasonable Assurance should be described as Adequate – corrections must be made. All other evaluation criteria should be fully Adequate.

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<sup>6</sup> 44 CFR 353 Appendix A

The FEMA Region will submit an IFR for Reasonable Assurance to FEMA HQ five (5) working days prior to the end of the Phase II. FEMA HQ will submit the IFR for Reasonable Assurance to the NRC prior to the end of Phase II.

**IFR for Reasonable Assurance Outline:**

Executive Summary

- I. Introduction
  - A. General Characteristics
  - B. Emergency Response Organizations
  - C. Plans
  - D. Basis for the findings:
    - i. 44 CFR part 353
    - ii. Guidance Memoranda
    - iii. NUREG-0654 FEMA-REP-1, Rev. 1
  - E. Evaluation Format
  
- II. Interim Finding of the Review of Evaluation of Emergency Preparedness Plans
  - A. NUREG-0654 Planning Standards A – P
  - B. Identify one of the following conditions for each criterion and each planning standard in the report:
    - i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
    - ii. **Adequate – corrections must be made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g., adequacy and maintenance of procedures, training, resources, staffing levels and qualifications, and equipment).
  
- III. Schedule of Pending Actions or Requirements for Reasonable Assurance
  - A. 44 CFR 353, Appendix A, part II.2 states that if the plans submitted are not complete (e.g., Situation 3 Site), then a Requirement for Reasonable Assurance is required. It will delineate milestones for preparation of the plan by the offsite authorities as well as FEMA’s actions to assist in timely development and review of the plans. FEMA has determined that the Requirements for Reasonable Assurance will be incorporated into the IFR within Section III.

IV. Review Composite Summary

A. Situation 1 Sites

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequate	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequate	C.1.c.	Adequate
A.1.c.	Adequate	A.3.	Adequate	C.2.a.	Adequate

A.1.d.	Adequate	A.4.	Adequate	C.2.b.	Adequate
A.1.e.	Adequate	C.1.a.	Adequate	C.3.	Adequate

B. Situation 2 and 3 Sites

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequ/Corr	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequ/Corr	C.1.c.	Adequate
A.1.c.	Adequate	A.3.	Adequ/Corr	C.2.a.	Adequ/Corr
A.1.d.	Adequate	A.4.	Adequate	C.2.b.	Adequ/Corr
A.1.e.	Adequate	C.1.a.	Adequate	C.3.	Adequ/Corr

V. Acronym Key

**NOTE:** Follow the Letters and Memoranda for Submittal process found in the Six Phase – Phase IV process.

***Phase III – Review of Safety Evaluation Report***

Two (2) working days allocated for this phase.

ACRS reviews the SER. FEMA is not directly involved in Phase III but could be called upon by the NRC for consultation or review of offsite plans.

***Phase IV – Final Review of Safety Evaluation Report***

Thirty-one (31) working days allocated for this phase.

This phase is primarily internal to the NRC for the final review editing and management concurrence of the Final SER. FEMA support would be requested for any changes that will impact FEMA’s final report.

## J. Post Combined License

### *Interim Finding Report on Preparedness*

#### **Deliverable FEMA Region:**

IFR on Preparedness

#### **Deliverable FEMA HQ:**

Letter of Reasonable Assurance to the NRC

This report will be issued after a qualifying exercise

An IFR on Preparedness will be based on the review of currently available plans and joint exercise results and will include an assessment as to:

- Whether offsite emergency plans are adequate as measured against the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1.
- Whether the exercise(s) demonstrated that there is reasonable assurance that the plans can be implemented.

An IFR on Preparedness will indicate one of the following conditions:

- There is reasonable assurance that the plans are adequate and can be implemented as demonstrated in an exercise.
- There are deficiencies that must be corrected.
- FEMA is undecided and will provide a schedule of actions leading to a decision.

### **Letters and Memoranda for Submittal**

#### **FEMA Region**

Create a Memorandum for FEMA HQ detailing the results of the Preparedness Exercise.

MEMORANDUM FOR: Chief, Radiological Emergency Preparedness Branch  
FROM: Chief, Technological Hazards Branch

SUBJECT: Final Report for the (Plant Name) Qualifying Exercise

The body of the memorandum should include all Deficiencies and Areas Requiring Corrective Actions (ARCAs). Provide a statement detailing whether or not the plans and preparedness of the jurisdictions can be implemented are adequate to provide Reasonable Assurance to protect the health and safety of the public.

**FEMA HQ**

Create letter to the NRC for IFR on Preparedness

To: Chief, Licensing and Inspection Branch, NRC

From: Chief, Radiological Emergency Preparedness Branch, FEMA

Compose a letter relaying the information supporting the above statements.

This letter will be courtesy copied to the respective FEMA Region.

## K. Glossary

AGENCYWIDE  
DOCUMENTS ACCESS  
AND MANAGEMENT  
SYSTEM (ADAMS)

The ADAMS is an information system that provides access to all image and text documents that the NRC has made public since November 1, 1999, as well as bibliographic records (some with abstracts and full text) that the NRC made public before November 1999. The NRC continues to add several hundred new documents daily. ADAMS permits full-text searching and enables users to view document images, download files, and print locally.

COMBINED LICENSE (COL)  
APPLICATIONS AND  
SUPPLEMENTAL  
INFORMATION

A combined license, when issued, is authorization from the NRC to construct and, with conditions, operate a nuclear power plant at a specific site and in accordance with laws and regulations. Prior to issuing a COL, the NRC staff will complete safety and environmental reviews of the combined license applications in accordance with the Atomic Energy Act, NRC regulations, and the National Environmental Policy Act. All stakeholders, most importantly the public, will be given notice as to how and when they may participate in the regulatory process including opportunities to request a hearing on issuance of the license.

DELIVERABLES

The work product from a process that includes analysis and reporting on the current State of emergency preparedness in a jurisdiction.

EARLY SITE PERMITS  
(ESP)

The NRC can issue an ESP for approval of one or more sites for one or more nuclear power facilities separate from the filing of an application for a construction permit or combined license in accordance with 10 CFR Part 52. An ESP is a partial construction permit and is, therefore, subject to all procedural requirements in 10 CFR Part 2 that are applicable to construction permits. Applications for ESPs will be reviewed according to the applicable standards set out in 10 CFR Parts 50 and 100 as they apply to applications for construction permits for nuclear power plants. ESP is good for 10 to 20 years and can be renewed for an additional 10 to 20 years. ESPs address site safety issues, environmental protection issues, and plans for coping with emergencies, independent of the review of a specific nuclear plant design.

FEDERAL EMERGENCY  
MANAGEMENT AGENCY  
(FEMA)

This agency establishes Federal policies for and coordinates all civil defense and civil emergency planning, management, mitigation, and assistance functions of executive agencies. FEMA assists local and State agencies in their emergency planning. Its primary role is one of coordinating Federal, State, local, and volunteer response actions for offsite areas.

INTERIM FINDING REPORT  
(IFR)

Report that is developed by reviewing States, Tribal and local plans that are responsible for a nuclear power plant.

NUCLEAR REGULATORY  
COMMISSION (NRC)

Congress created the NRC as an independent agency in 1974 to enable the nation to safely use radioactive materials for beneficial civilian purposes while ensuring that people and the environment are protected. The NRC regulates commercial nuclear power plants and other uses of nuclear materials, such as nuclear medicine, through licensing, inspection and enforcement of its requirements.

REASONABLE  
ASSURANCE

Reasonable assurance is the recognition that “adequate protective measures can and will be taken in the event of a radiological emergency”. Reasonable assurance is based on licensees complying with NRC regulations and guidance, as well as licensees and offsite response organizations demonstrating that they can effectively implement emergency plans and procedures during periodic evaluated exercises.

OPEN ITEMS

Any RAIs that have not been resolved as of Phase II in accordance with NUREG-0654 FEMA-REP-1, Rev. 1 criteria. All open items must be resolved before Phase IV.

SCHEDULE OF  
REQUIREMENTS FOR  
REASONABLE  
ASSURANCE

The Schedule of Requirements for Reasonable Assurance is used primarily with Situation 2 and 3 site applications. It is included in the Interim Finding Report (IFR) when plans cannot be completely developed because equipment, buildings, and infrastructure do not exist yet

## L. Acronyms

ACRS	ADVISORY COMMITTEE ON REACTOR SAFETY
CFR	CODE OF FEDERAL REGULATIONS
COL	COMBINED LICENSE
FEMA	FEDERAL EMERGENCY MANAGEMENT AGENCY
FR	FEDERAL REGISTER
HQ	HEADQUARTERS
IFR	INTERIM FINDING REPORT
MOU	MEMORANDUM OF UNDERSTANDING
NEI	NUCLEAR ENERGY INSTITUTE
NPP	NUCLEAR POWER PLANT
NRC	NUCLEAR REGULATORY COMMISSION
NRO	NEW REACTOR OFFICER
NUREG	NUCLEAR REGULATIONS
OI	OPEN ITEM
ORO	OFFSITE RESPONSE ORGANIZATION
POA&M	PLAN OF ACTION AND MILESTONES
PM	PROJECT MANAGER
PSER	PRELIMINARY SAFETY EVALUATION REPORT
RRAC	RADIOLOGICAL REGIONAL ASSISTANCE COMMITTEE
RAI	REQUEST FOR ADDITIONAL INFORMATION
REP	RADIOLOGICAL EMERGENCY PREPAREDNESS
REPP	RADIOLOGICAL EMERGENCY PREPAREDNESS PROGRAM
RERP	RADIOLOGICAL EMERGENCY RESPONSE PLANS
SER	SAFETY EVALUATION REPORT
SOP	STANDARD OPERATING PROCEDURES
TBD	TO BE DETERMINED

## M. Appendices

1. Sample Memo for Insufficient Acceptance Review
2. Sample Memo for Sufficient Acceptance Review
3. Sample Letter for Interim Finding Report for RAIs
4. RAI Submittal Form Example
5. Operating Site RAI Tracking Form
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8. Open Items Submittal Form Example
9. Direct Discussion Form
10. Interim Finding Report Example
11. Post COL Actions Needed Tracking Form
12. Requirements for Reasonable Assurance
13. Points of Contact
  - Applicant
  - FEMA Headquarters
  - NRC
  - FEMA Regions

**APPENDIX 1**  
**Sample Memo for Insufficient Acceptance Review**

(Date)

MEMORANDUM FOR: \_\_\_\_\_  
Chief  
Radiological Emergency Preparedness Branch

FROM: \_\_\_\_\_  
Chief  
Technological Hazards Branch

SUBJECT: Acceptance Review of Offsite Radiological Emergency Plans  
for the \_\_\_\_\_, Combined License Application

The FEMA Region \_\_\_\_\_ REP staff has reviewed the plans submitted for (Plant Name) dated (date). FEMA has found the \_\_\_\_\_ State plans and \_\_\_\_\_ county plans submitted to be current and complete.

However, there are additional supporting plans/references in the \_\_\_\_\_ Plan which were not included and are necessary for performing a complete review of the application. The following list identifies the information needed in order to proceed with the review:

- 
- 
- 

Please contact (Regional staff person) at (phone) if you have any questions.

**APPENDIX 2**  
**Sample Memo for Sufficient Acceptance Review**

(Date)

MEMORANDUM FOR: \_\_\_\_\_  
Chief  
Radiological Emergency Preparedness Branch

FROM: \_\_\_\_\_  
Chief  
Technological Hazards Branch

SUBJECT: Acceptance Review of Offsite Radiological Emergency  
Response Plan for \_\_\_\_\_ Nuclear Power Plant  
(NPP) Combined License (COL)

Describe the Regions, Plant site and relevant authorities from the State/counties plans. Describe any information that was received for further review that was omitted in the original submission.

In response to our \_\_\_\_\_ memorandum to you, we received additional plans relative to the subject application directly from the utility on \_\_\_\_\_. These re-submitted plans, provided to address the shortcomings described in our \_\_\_\_\_ memorandum, were reviewed, and the following comments are provided:

- Our \_\_\_\_\_ memorandum indicated the plans for the State of \_\_\_\_\_ (Annex Q) and the \_\_\_\_\_ Risk Counties (Alpha, Beta and Charlie Counties) were dated 2004 and did not contain a NUREG -0654 cross -reference. Updated plans for the State of \_\_\_\_\_ (July 2007) were subsequently submitted. Those plans contained the requested cross reference, and this issue is considered resolved.
- Our \_\_\_\_\_ memorandum indicated the plans for the State of \_\_\_\_\_ (Annex \_\_\_) did not contain references (including maps) to the new county highway that has been completed, and would most surely impact upon various aspects of the evacuation plan. The revised \_\_\_\_\_ (date) evacuation annex (\_\_\_) was received by this Office, and it addresses in all respects, the earlier paucity of information on this new highway. All issues related to this earlier oversight to be closed.

**APPENDIX 3**  
**Sample Letter for Interim Finding Report for RAIs**

(Date)

Chief, Licensing and Inspection Branch  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington DC 20555-0001

Ref: Interim Finding Report (IFR) for Requests for Addition Information (RAIs) of the Offsite Emergency Response Plans for the Combined License Application – (Name of site)

Dear (Addressee):

Please find enclosed the Interim Finding Report of the COL application, (Name of site) submitted by the Radiological Emergency Preparedness Program staff from our Region \_\_\_\_ Office. The information pertaining to offsite radiological emergency response plans, provided in the COL application, was utilized in establishing the content of this report.

All Requests for Addition Information (RAIs) have been submitted to your agency for this phase of the safety review and are all identified in the enclosed report.

Should you and or members of your staff have any questions regarding this matter, please contact (New Reactor Team member) at (phone) or (New Reactor Team Leader) at (phone).

Sincerely,

(Branch Chief)  
Chief  
Radiological Emergency Preparedness Branch

Enclosure: As stated

cc: (New Reactor Team Leader), NRC  
(Name), FEMA Region \_\_\_\_

## APPENDIX 4 RAI Submittal Form Example

RAIs should be formatted according to the template below and should contain the following information:

- Each RAI should include the description of the needed additional information or question posed to the COL Applicant.
- Each RAI should include a reference to the planning standard and, if applicable, the evaluation criterion identified in NUREG-0654 FEMA-REP-1, Rev. 1
- All RAIs will contain of a site identifier and be sequentially numbered.
- Organize planning standard in separate paragraphs.
- Standardize wording
- For multiple parts of one RAI use sub-numbers organized in the same order as the requirements in the criterion

RAI Number	RAI Description	State/Tribal County 1/ County 2
(SITE) - 001	<p>Subject: (brief subject)                      Basis: NUREG-0654, Evaluation Criterion (X.1.x)                      SRP ACCEPTANCE CRITERION : Requirement H                      Note: (if applicable, related RAI or revision information)</p> <p>A. State Plan (name) (specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>B. County Plan 1 (name) (specific plan section, if applicable) (if multiple items relevant to this subject and this plan – otherwise put different subject under a new RAI)</p> <p>B.1. County Plan 1, (specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>B.2. County Plan 1, (different specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>C. County Plan 2 (name) (specific plan section, if applicable) (description of question) Provide (needed information)</p>	S/C1/C2





## **APPENDIX 7**

### **Sample Letter for Interim Finding Report for OIs**

(Date)

(Addressee)

Chief, Licensing and Inspection Branch  
Division of Preparedness and Response  
Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Ref: Interim Findings Report (IFR) for Open Items (OIs) for the (name of site) Combined License (COL) Application

Dear (Addressee):

Please find enclosed the IFR for OIs for the (name of site) COL application submitted by the Radiological Emergency Preparedness (REP) Program staff from our Region \_\_ Office.

FEMA has reviewed the applicant's response to Phase I IFR Request for Additional Information (RAI), and the unresolved RAIs have been converted to OIs in the development of this document.

The enclosed IFR for OIs serves as the deliverable for the completion of FEMA's portion of Phase II of the (name of site) COL application process.

Should you or members of your staff have any questions regarding this matter, please contact (New Reactor Team member) at (phone) or (New Reactor Team Leader) at (phone)

Sincerely,

(Branch Chief)  
Chief  
Radiological Emergency Preparedness Branch

Enclosure: As stated

cc: (New Reactor Team Leader), NRC  
(Name), FEMA Region \_\_\_\_

## APPENDIX 8

### Open Items Submittal Form Example

Each OI should keep the original RAI site identifier and number

OI Ref.	Open Item Description	State/Tribal County 1/ County 2
<p><b>RAI Number (SITE) - 001</b></p>	<p>Subject: (brief subject)                      Basis: NUREG-0654, Evaluation Criterion (X.1.x)                      SRP ACCEPTANCE CRITERION : Requirement H                      Note: (if applicable, related RAI or revision information)</p> <p>A. State Plan (name) (specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>B. County Plan 1 (name) (specific plan section, if applicable) (if multiple items relevant to this subject and this plan – otherwise put different subject under a new RAI)</p> <p>B.1. County Plan 1, (specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>B.2. County Plan 1, (different specific plan section, if applicable) (description of question) Provide (needed information)</p> <p>C. County Plan 2 (name) (specific plan section, if applicable) (description of question) Provide (needed information)</p>	<p>S/C1/C2</p>



**APPENDIX 10**  
**Interim Finding Report Example**

**Interim Finding Report for \_\_\_\_\_**  
**(RAI/OI/Reasonable Assurance)**

**On the adequacy of the offsite**

**Radiological Emergency Response Planning and Preparedness**

**for the**

\_\_\_\_\_ **Nuclear Power Plant**

\_\_\_\_\_ **City** \_\_\_\_\_ **State**

\_\_\_\_\_ **Date**

Prepared by the  
U.S. Department of Homeland Security  
Federal Emergency Management Agency  
National Preparedness Directorate  
Technological Hazards Division

Region \_\_\_\_\_

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D. Emergency Classification System	
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F. Emergency Communications	
G. Public Education and Information	
H. Emergency Facilities and Equipment	
I. Accident Assessment	
J. Protective Response	
K. Radiological Exposure Control	
L. Medical and Public Health Support	
M. Recovery and Reentry Planning and Post-Accident Operations	
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## Executive Summary

### I. Introduction

#### A. General Characteristics of the \_\_\_\_\_ Nuclear Plant

The \_\_\_\_\_ Nuclear Plant sites, consisting of \_\_\_\_ acres, is located in \_\_\_\_\_ County(ies) in (direction) State, on the E/N/W/S shore of the (body of water) or describe the general location and cite approximate distance/direction from the nearest major cities (use two examples).

The 10-mile plume Emergency Planning Zone (EPZ) includes (list the counties and major cities) within the (States).

The \_\_\_\_\_ Nuclear Power plant is owned and operated by \_\_\_\_\_.

#### B. Emergency Response Organizations

Describe the authorities from the State/counties plans. Example “Final authority for all offsite emergency actions in response to a radiological incident at a fixed nuclear plant rests with the Governor of the State of \_\_\_\_\_; or with the Mayor of the City of \_\_\_\_\_”.

Describe the concept for overall emergency management and coordination. Cite the responsible organization for coordination of State, local, private and volunteer organizations with Federal response elements.

Describe the organizations and relationships within the State for entities with responsibilities related to radiological emergency planning and response. Ensure accident assessment, radiation monitoring, health hazards, and protective action guidelines are discussed.

#### C. Plans

Describe how the State plans are organized. Include number of volumes and overall content of each volume. List the annexes by volumes that are in the plans.

#### D. Basis for Findings

Discuss the critical elements citing above (and any not-previously mentioned items) that form the basis for the determination. List key elements, and cite specific coordination used to derive finding.

E. Evaluation Format

In accordance with the Memorandum of Understanding (MOU) (44 CFR 353 appendix A) with the Nuclear Regulatory Commission (NRC) FEMA agreed to furnish assessments, findings and determinations as to whether State, Tribal and local emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, and resources, staffing levels and qualification and equipment adequacy). These findings and determinations are used by the NRC under its own rules in connection with its licensing and regulatory requirements and FEMA supports its findings in the NRC licensing process and related court proceedings- 44 CFR 350.3(f).

NUREG/0654/FEMA-REP-1 Rev. 1 Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants November 1980 is the guidance used to review and develop this Interim Finding Report. Each planning standard will have an overall rating.

II. Review and Evaluation of Emergency Preparedness Plans for the \_\_\_\_\_ Nuclear Plant against the Planning Standards of NUREG-0654/FEMA-REP-1, Rev.1

- A. Assignment of responsibility (Organizational Control)
- B. Onsite Emergency Organization
- C. Emergency Response Support and Resources
- D. Emergency Classification System
- E. Notification Methods and Procedures
- F. Emergency Communications
- G. Public Education and Information
- H. Emergency Facilities and Equipment
- I. Accident Assessment
- J. Protective Response
- K. Radiological Exposure Control
- L. Medical and Public Health Support
- M. Recovery and Reentry Planning and Post-Accident Operations
- N. Exercises and Drills
- O. Radiological Emergency Response Training
- P. Responsibility for the Planning Effort: Distribution, Periodic Review and Distribution of Emergency Plans

III. Schedule

- A. Pending Action – Describe in a statement items that are pending.
  - 1. The State of \_\_\_\_\_ is awaiting the Qualifying Exercise of the offsite plans and procedures that will be conducted on \_\_\_\_\_.
  - 2. The county is awaiting the county official signature for the final revision to the plans

B. Requirements for Reasonable Assurance

IV. Review Composite Rating Summary – A one page table of the 109 criterion ratings

Criterion	Rating	Criterion	Rating	Criterion	Rating
A.1.a.	Adequate	A.2.a.	Adequate	C.1.b.	Adequate
A.1.b.	Adequate	A.2.b.	Adequate	C.1.c.	Adequate
A.1.c.	Adequate	A.3.	Adequate	C.2.a.	Adequate
A.1.d.	Adequate	A.4.	Adequate	C.2.b.	Adequate
A.1.e.	Adequate	C.1.a.	Adequate	C.3.	Adequate

V. Request for Additional Information

VI. Acronym Key

**APPENDIX 11**  
**Requirements for Reasonable Assurance Tracking Form**

Time Frame <sup>7</sup>	Evaluation Criterion <sup>8</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>9</sup>	Resolution Description and Date
<b>E-22</b>	A.3 (State/Local)	All appropriate Letters of Agreement have been obtained and incorporated into the State plan.	
	C.4 (State/Local)	All appropriate Letters of Agreement have been obtained and incorporated into the State plan.	
<b>E-18</b>	E.2 (State/Local)	Procedures are established for alerting, notifying, and mobilizing emergency response personnel. (1.a.1)	
	E.5 (State/Local)	Emergency Alert System procedures are developed. (5.a.1, 5.b.1)	
	E.6 (State/Local)	Public Alert and Notification procedures are developed. (5.a.1, 5.a.3)  Install and test outdoor warning systems (sirens)	
	G.3.a (State/Local)	State plans designate the points of contact and physical locations for use by news media during an emergency. (5.b.1)	
	H.7 (State/Local)	Plans indicate where offsite monitoring equipment is located. (1.e.1)	

<sup>7</sup> E - x = Months prior to qualifying exercise

<sup>8</sup> NUREG 0654 FEMA-REP-1 Rev 1

<sup>9</sup> Federal Register Vol. 67 No. 80, April 25, 2002

Time Frame <sup>7</sup>	Evaluation Criterion <sup>8</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>9</sup>	Resolution Description and Date
	H.10 (State/Local)	Plans include an inventory of equipment and instruments, as well as inspection and calibration procedures. (1.e.1, 4.a.1, 6.d.1)	
	H.11 (State/Local)	Plans include emergency equipment inventory lists in an appendix.	
	H.12 (State/Local)	Plans establish a central point for the receipt and analysis of all field monitoring data and coordination of sample media. (4.a.2)	
	I.8 (State/Local)	Plans and procedures describe, where appropriate, the methods, equipment and expertise to be used to make rapid assessment of the actual or potential radiological hazards. (2.b.1, 4.a.1, 4.a.2, 4.b.1)	
	I.10 (State/Local)	Plans and procedures describe, where appropriate, the means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements. Provisions, described in separate procedures, are made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. (2.b.1, 2.e.1)	
	J.10.e (State/Local)	Plans describe provisions for the use of radio protective drugs, such as potassium iodide (KI), especially for emergency workers and institutionalized persons within the plume exposure EPZ. State plans and/or procedures, as appropriate, include the quantities, storage locations, and means of distribution of KI. (1.e.1, 2.a.1, 2.c.1, 3.b.1)	

Time Frame <sup>7</sup>	Evaluation Criterion <sup>8</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>9</sup>	Resolution Description and Date
	J.10.h (see J.12) (State/Local)	Plans describe, as appropriate the locations of Congregate Care Centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone. (6.a.1, 6.c.1)	
	J.10.j (State/Local)	Traffic/Access Control procedures are developed. (3.d.1)	
	J.11 (State/Local)	Procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures such as impoundment, decontamination, processing, decay, product diversion and preservation are developed and included in State plans. Maps for recording survey and monitoring data, key land use data are developed. Up-to-date lists of the name and location of all facilities within the ingestion pathway EPZ which regularly process milk products and other food or agricultural products originating in that EPZ are maintained. (1.e.1, 2.d.1, 3.e.1, 3.e.2, 4.b.1, 4.c.1)	
	J.12 (State/Local)	Reception Center/Monitoring and Decontamination procedures	
	K.3.a (State/Local)	Plans and/or procedures are developed, as appropriate, for the distribution of both self-reading and permanent record devices to State emergency workers. (1.3.1, 3.a.1)	
	K.5.b (State/Local)	Procedures for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal are developed, as appropriate. (6.b.1, 6.d.1)	
	L.4 (State/Local)	Emergency medical services providers are identified and the appropriate LOAs are obtained. (6.d.1)	

Time Frame <sup>7</sup>	Evaluation Criterion <sup>8</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>9</sup>	Resolution Description and Date
	O.1.b (State/Local)	Mutual aid organizations are identified and training opportunities are offered to those organizations.	
	O.4.a (State/Local)	Training for directors or coordinators of response organizations is conducted.	
	O.4.b and O.4.c (State/Local)	Training for accident assessment and radiological monitoring/analysis personnel is conducted.	
	O.4.d (State/Local)	Training for police security and fire fighting personnel is conducted.	
	O.4.f (State/Local)	Training for first aid and rescue personnel is conducted.	
	O.4.g (State/Local)	Training for local support services personnel is conducted.	
	O.4.h (State/Local)	Training for medical support personnel is conducted.	
	O.4.j (State/Local)	Training for personnel responsible for transmission of emergency information and instructions is conducted.	
<b>E-12</b>	G.1 (State/Local)	Public information materials are developed to include the required information.	
	G.2 (State/Local)	A description of the types, locations, means for annual updating, and means of distribution of public information materials is included in the State plan, as appropriate.	
<b>E-6</b>	N.2.a (State/Local)	Communication drills are conducted.	
	N.2.c (State/Local)	Medical emergency drills are conducted prior to the qualifying exercise and a schedule for subsequent drills is established.	
	N.2.d (State/Local)	Radiological monitoring drills are conducted.	

Time Frame <sup>7</sup>	Evaluation Criterion <sup>8</sup>	Action Needed and Applicable Exercise Evaluation Methodology <sup>9</sup>	Resolution Description and Date
	N.2.e (State/Local)	Health physics drills are conducted.	
<b>E-2</b>	P.6 (State/Local)	The plan is updated to include all supporting plans.	
	P.7 (State/Local)	The plan is updated to include a listing of all implementing procedures and the plan sections to be implemented by each.	
	P.8 (State/Local)	The plan table of contents and NUREG-0654 cross-reference are updated.	
<b>E-0</b>	N.1.a (State/Local)	A successful qualifying exercise is conducted.	

## APPENDIX 12 Requirements for Reasonable Assurance

\*Refers to Interim REP Program Manual

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p><b>Planning Standard A</b></p> <p>A.1.a Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See appendix 5).</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans describe State, Federal, local, Tribal, and private sector organizations comprising the overall ORO. Identify the principal response organizations as outlined in NUREG-0654 Appendix 5.</p> <p><u>Proposed plans:</u> Review has verified that plans describe known and anticipated State, Federal, local, Tribal, and private sector organizations comprising the overall ORO and identify the principal response organizations as outlined in NUREG-0654 Appendix 5.</p>	<p><u>Plans:</u> Review has verified that plans identify State, Federal, local, Tribal, and private sector organizations comprising the overall ORO, along with the principal response organizations as outlined in NUREG-0654 Appendix 5.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

<sup>10</sup> Federal Register Vol. 67 No.:80, April 25, 2002

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>A.1.b Each organization and sub organization having an operational role shall specify its concept of operations and its relationship to the total effort.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans describe each organization's role and how the organization will carry out its responsibilities in an emergency <i>consistent with NIMS*</i>.</p> <p><u>Proposed plans:</u> Review has verified that plans describe each known organization's role and how the organization will carry out its responsibilities in an emergency <i>consistent with NIMS*</i>.</p>	<p><u>Plans:</u> Review has verified that plans describe all organizations' roles and how the organizations will carry out their responsibilities in an emergency <i>consistent with NIMS*</i>.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
<p>A.1.c Each plan shall illustrate these interrelationships in a block diagram.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans include block diagram.</p> <p><u>Proposed plans:</u> Review has verified that plans include block diagram, if available.</p>	<p><u>Plans:</u> Review has verified that plans include block diagram.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
<p>A.1.d Each organization shall identify a specific individual by title who shall be in charge of the emergency response.</p> <p>(State/Local)</p>	<p>1.c.1 Key personnel with leadership roles for ORO provide direction and control to that part of the overall response effort for which they are responsible.</p>	<p><u>Existing plans:</u> Review has verified that plans identify specific individual(s) by title or position in charge of emergency response.</p> <p><u>Proposed plans:</u> Review has verified that plans identify specific individual(s) by title or position in charge of emergency response, if known.</p>	<p><u>Plans:</u> Review has verified that plans identify specific individual(s) by title or position in charge of emergency response.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>A.1.e Each organization shall provide for 24-hour per day emergency response, including 24-hour per day manning of communications links.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans describe 24-hour response and communication capability.</p> <p><u>Proposed plans:</u> Review has verified that plans provide assurance that 24-hour response and communication capability will exist.</p>	<p><u>Plans:</u> Review has verified that plans describe 24-hour response and communication capability and this capability is successfully demonstrated.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>A.2.a Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other. (See Section B for licensee).</p> <p>(State/Local)</p>	<p>1.c.1 Key personnel with leadership roles for ORO provide direction and control to that part of the overall response effort for which they are responsible.</p>	<p><u>Existing plans:</u> Review has verified that plans include a matrix of known primary and support organizations addressing all functions and responsibilities <i>consistent with ICS*</i>.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a matrix of known primary and support organizations addressing all functions and responsibilities <i>consistent with ICS*</i>.</p>	<p><u>Plans:</u> Review has verified that plans provide a finalized matrix of all primary and support organizations addressing all functions and responsibilities <i>consistent with ICS*</i>.</p> <p><u>Implementation:</u> Provide a finalized matrix of all primary and support organizations</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>A.2.b Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.</p> <p>(State/Local)</p>	<p>1.c.1 Key personnel with leadership roles for ORO provide direction and control to that part of the overall response effort for which they are responsible.</p>	<p><u>Existing plans:</u> Review has verified that plans provide (by reference to specific acts, codes or statutes) the legal basis for such authorities.</p> <p><u>Proposed plans:</u> Review has verified that plans provide (by reference to specific acts, codes or statutes) the legal basis for such authorities, if established.</p>	<p><u>Plans:</u> Review has verified that plans provide (by reference to specific acts, codes or statutes) the legal basis for such authorities.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>A.3 Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.</p> <p>(State/Local)</p>	<p>All appropriate Letters of Agreement have been obtained and incorporated into the plan.</p>	<p><u>Existing plans</u>: Review has verified that plans contain all appropriate letters of agreement.</p> <p><u>Proposed plans</u>: Review has verified that plans include a commitment to obtain all appropriate letters of agreement.</p>	<p><u>Plans</u>: Review has verified that all appropriate Letters of Agreement have been obtained and incorporated into the plan.</p> <p><u>Implementation</u>: Letters of Agreement have been obtained and incorporated into the plan.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>A.4 Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.</p> <p>(State/Local)</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans describe capability for continuous (24-hour) operations for a protracted period.</p> <p><u>Proposed plans:</u> Review has verified that plans provide assurance that capability for continuous (24-hour) operations for a protracted period will be established.</p>	<p><u>Plans:</u> Review has verified that plans describe capability for continuous (24-hour) operations for a protracted period and specify by title the individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material).</p> <p><u>Implementation:</u> This capability is successfully demonstrated.</p>
<p>Planning Standard C</p>			
<p>C.1.a Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including... specific persons by title authorized to request Federal assistance; see A.1.d., and A.2.a.</p> <p>(Licensee/State)</p>		<p><u>Existing plans:</u> Review has verified that plans describe the process of requesting Federal assistance.</p> <p><u>Proposed plans:</u> Review has verified that plans describe the process of requesting Federal assistance.</p>	<p><u>Plans:</u> Review has verified that plans describe the process of requesting Federal assistance.</p> <p><u>Implementation:</u> The process is successfully demonstrated.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>C.1.b Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including... specific Federal resources expected, including expected times of arrival at specific nuclear facility sites.</p> <p>(Licensee/State)</p>		<p><u>Existing plans:</u> Review has verified that plans describe the process of incorporating Federal response capability into the operation plan, including expected times of arrival.</p> <p><u>Proposed plans:</u> Review has verified that plans describe the process of incorporating Federal response capability into the operation plan.</p>	<p><u>Plans:</u> Review has verified that plans describe the process of incorporating Federal response capability into the operation plan, including expected times of arrival.</p> <p><u>Implementation:</u> Provide a copy of the plan section incorporating Federal response capability, including expected times of arrival.</p>
<p>C.1.c Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including... specific licensee, State and local resources available to support the Federal response, e.g., airfields, command posts, telephone lines, radio frequencies and telecommunications centers.</p> <p>(Licensee/State)</p>		<p><u>Existing plans:</u> Review has verified that plans describe the process of incorporating Federal response capability into the plan, including specific resources available to support the Federal response.</p> <p><u>Proposed plans:</u> Plans describe the process of incorporating Federal response capability into the plan, including any specific known resources available to support the Federal response.</p>	<p><u>Plans:</u> Review has verified that plans describe the process of incorporating Federal response capability into the plan, including specific resources available to support the Federal response.</p> <p>Provide the plan section incorporating Federal response capability, including specific resources available to support the Federal response.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>C.2.a Each principal offsite organization may dispatch representatives to the licensee's near site Emergency Operations Facility. (State technical analysis representatives at the near site EOF are preferred.)</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Plans describe expectations of entities responding to the EOF.</p> <p><u>Proposed plans:</u> Plans describe expectations of entities responding to the EOF, if known.</p>	<p><u>Plans:</u> Review has verified that plans describe expectations of entities responding to the EOF.</p> <p><u>Implementation:</u> If applicable, capability to dispatch technical liaisons to the EOF is demonstrated.</p>
<p>C.3 Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.</p> <p>(State)</p>		<p><u>Existing plans:</u> Review has verified that plans include a listing of radiological laboratories and their general capabilities.</p> <p><u>Proposed plans:</u> Review has verified that plans provide assurance that a listing of radiological laboratories and their general capabilities will be included.</p>	<p><u>Plans:</u> Review has verified that plans identify radiological laboratories, their general capabilities and expected availability sufficient to provide radiological monitoring and analyses services which can be used in an emergency.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
<p>C.4 Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.</p> <p>(State/Local)</p>	<p>All appropriate Letters of Agreement have been obtained and incorporated into the plan.</p>	<p><u>Existing plans:</u> Plans include all appropriate letters of agreement.</p> <p><u>Proposed plans:</u> Plans provide a commitment to obtain all appropriate letters of agreement.</p>	<p><u>Plans:</u> Review has verified that plans all appropriate Letters of Agreement have been obtained and incorporated into the plan.</p> <p><u>Implementation:</u> Letters of Agreement have been obtained and incorporated into the plan.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
Planning Standard D			
<p>D.3 Each State and local organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility licensee.</p> <p>(State/Local)</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans include an emergency classification and emergency action level scheme that is consistent with the one established by the facility licensee.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment that an emergency classification and emergency action level scheme will be established consistent with the one established by the facility licensee.</p>	<p><u>Plans:</u> Review has verified that plans include an emergency classification and emergency action level scheme that is consistent with the one established by the facility licensee.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
<p>D.4 Each State and local organization should have procedures in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local offsite conditions that exist at the time of the emergency.</p> <p>(State/Local)</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans include procedures for emergency actions to be taken to protect the public at each ECL, given the local conditions at the time of the emergency.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop procedures for emergency actions to be taken to protect the public at each ECL, given the local conditions at the time of the emergency.</p>	<p><u>Plans:</u> Review has verified that plans include the emergency actions to be taken to protect the public at each ECL, given the local conditions at the time of the emergency.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
Planning Standard E			
<p>E.1 Each organization shall establish procedures which describe mutually agreeable</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency</p>	<p><u>Existing plans:</u> Review has verified that plans establish procedures which describe mutually agreeable bases for</p>	<p><u>Plans:</u> Review has verified that plans establish procedures which describe mutually agreeable bases for</p>

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<p>bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.</p> <p>(State/Local)</p>	<p>personnel and activate facilities in a timely manner.</p>	<p>notification of response organizations consistent with the emergency classification and action level scheme, including verification of messages.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme, including verification of messages.</p>	<p>notification of response organizations consistent with the emergency classification and action level scheme, including verification of messages.</p> <p><u>Implementation:</u> Demonstrate plans and or procedures for notification of response organizations consistent with the emergency classification and action level scheme, including verification of messages.</p>
<p>E.2 Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.</p> <p>(State/Local)</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans establish procedures for alerting, notifying, and mobilizing emergency response personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish procedures for alerting, notifying, and mobilizing emergency response personnel.</p>	<p><u>Plans:</u> Review has verified that procedures are established</p> <p><u>Implementation:</u> Procedures are successfully tested for alerting, notifying, and mobilizing emergency response personnel.</p>
<p>E.5 State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow-up messages received from the licensee including the appropriate notification to appropriate broadcast media, e.g., the Emergency Alert</p>	<p>5.a.1 Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorizer offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a</p>	<p><u>Existing plans:</u> Review has verified that plans include a system for disseminating appropriate information to the public through initial and follow-up messages.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish a system for disseminating appropriate information to the public</p>	<p><u>Plans:</u> Review has verified that Emergency Alert System procedures for initial and follow-up messages are developed.</p> <p><u>Implementation:</u> Emergency Alert System procedures are successfully demonstrated.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
System.  (State/Local)	minimum the elements required by current FEMA REP guidance.  5.b.1 OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.	through initial and follow-up messages.	

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<p>E.6 Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. (See Appendix 3.) It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.</p> <p>(State/Local)</p>	<p>5.a.1 Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorizer offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance.</p> <p>5.a.3 Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system.</p>	<p><u>Existing plans:</u> Review has verified that plans establish a public alert and notification system in accordance with current FEMA ANS guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish a public alert and notification system in accordance with current FEMA ANS guidance.</p>	<p><u>Plans:</u> Review has verified that plans establish a public alert and notification system in accordance with current FEMA ANS guidance.</p> <p><u>Implementation:</u> The Public Alert and Notification system has been designed, developed, installed, and tested successfully.</p>
<p>E.7 Each organization shall provide written messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to</p>	<p>5.a.1 Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorizer offsite</p>	<p><u>Existing plans:</u> Review has verified that plans contain pre-scripted messages intended for the public, consistent with the licensee's classification scheme, including draft messages to the public giving</p>	<p><u>Plans:</u> Review has verified that plans contain pre-scripted messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to the public giving instructions with</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans. Such messages should include the appropriate aspects of sheltering, ad hoc respiratory protection, e.g., handkerchief over mouth, thyroid blocking or evacuation. The role of the licensee is to provide supporting information for the messages. For ad hoc respiratory protection see "Respiratory Protective Devices Manual" American Industrial Hygiene Association, 1963, pp. 123–126.</p> <p>(State/Local)</p>	<p>emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance.</p> <p>5.b.1 OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.</p>	<p>instructions with regard to specific protective actions to be taken by occupants of affected areas.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop pre-scripted messages intended for the public, consistent with the licensee's classification scheme, including draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas.</p>	<p>regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans.</p> <p><u>Implementation:</u> Use of these messages is successfully demonstrated.</p>

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Planning Standard F			
<p>F.1.a Each plan shall include... provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions.</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include provision for a 24-hour activation of response, including primary and backup communication links.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include a 24-hour activation of response, including primary and backup communication links.</p>	<p><u>Plans:</u> Review has verified that plans describe the equipment, personnel, and systems used for notification and activation of response on a 24-hour basis.</p> <p><u>Implementation:</u> This activation is successfully demonstrated.</p>
<p>F.1.b Each plan shall include... provision for communications with contiguous State/local governments within the Emergency Planning Zones.</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for communications with contiguous State/local governments within the Emergency Planning Zones.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include provisions for communications with contiguous State/local governments within the Emergency Planning Zones.</p>	<p><u>Plans:</u> Review has verified that plans include provisions for communications with contiguous State/local governments within the Emergency Planning Zones.</p> <p><u>Implementation:</u> This communication is successfully demonstrated.</p>

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<p>F.1.c Each plan shall include... provision for communications as needed with Federal emergency response organizations.</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for communications as needed with Federal emergency response organizations.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include provisions for communications as needed with Federal emergency response organizations.</p>	<p><u>Plans:</u> Review has verified that plans describe provisions for communications as needed with Federal emergency response organizations.</p> <p><u>Implementation:</u> These provisions are successfully demonstrated.</p>
<p>F.1.d Each plan shall include... 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.</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions 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.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams.</p>	<p><u>Plans:</u> Review has verified that plans include provisions 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.</p> <p><u>Implementation:</u> This communication is successfully demonstrated.</p>

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<p>F.1.e Each plan shall include... provision for alerting or activating emergency personnel in each response organization.</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for alerting or activating emergency personnel in each response organization.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include provisions for alerting or activating emergency personnel in each response organization.</p>	<p><u>Plans:</u> Review has verified that plans include provisions for alerting or activating emergency personnel in each response organization.</p> <p><u>Implementation:</u> This alerting or activating is successfully demonstrated.</p>
<p>F.2 Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exists.</p> <p>(State/Local)</p>	<p>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.</p> <p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans contain provisions to ensure that a coordinated communication link for fixed and mobile medical support facilities exists.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to ensure that a coordinated communication link for fixed and mobile medical support facilities exists.</p>	<p><u>Plans:</u> Review has verified that plans contain provisions to ensure that a coordinated communication link for fixed and mobile medical support facilities exists.</p> <p><u>Implementation:</u> These communication links are successfully demonstrated.</p>

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<p>F.3 Each organization shall conduct periodic testing of the entire emergency communications system (see evaluation criteria N.2.a, N.2.d and Appendix 3<sup>11</sup>).</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans include provisions for periodic testing of the entire emergency communications system.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to conduct periodic testing of the entire emergency communications system.</p>	<p><u>Plans:</u> Review has verified that plans include provisions for periodic testing of the entire emergency communications system.</p> <p><u>Implementation:</u> The entire emergency communications system is successfully demonstrated.</p>

<sup>11</sup> Revised by FEMA GM PR-1.

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Planning Standard G			
<p>G.1 Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a. educational information on radiation;</li> <li>b. contact for additional information;</li> <li>c. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radio protective drugs; and</li> <li>d. protective measures related to the ingestion pathway<sup>12</sup>; and</li> <li>e. special needs of the handicapped.</li> </ul> <p>Means for accomplishing the required dissemination prior to an emergency may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; posting in public</p>	<p>Public information materials are developed to include the required information.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency.</p>	<p><u>Plans:</u> Review has verified that plans describe all periodic information to be disseminated to the public.</p> <p><u>Implementation:</u> These materials are presented for review.</p>

<sup>12</sup> Revised by FEMA GM IN-1

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<p>areas; and publications distributed on an annual basis.</p> <p>(State/Local)</p>			
<p>G.2 The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated at least annually. Signs or other measures (e.g., decals, posted notices or other means. placed in hotels, motels, gasoline stations and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the</p>	<p>A description of the types, locations, means for annual updating, and means of distribution of public information materials is included in the plan, as appropriate.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the types, locations, means of annual update, and means of distribution of public information materials.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to describe the types, locations, means of annual update, and means of distribution of public information materials included in the plan.</p>	<p><u>Plans:</u> Review has verified that plans describe the types, locations, means of annual update, and means of distribution of public information materials.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>

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<p>telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.</p> <p>(State/Local)</p>			
<p>G.3.a Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.</p> <p>(State/Local)</p>	<p>5.b.1 OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans designate the points of contact and physical locations for use by news media during an emergency.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to designate the points of contact and physical locations for use by news media during an emergency.</p>	<p><u>Plans:</u> Review has verified that plans designate the points of contact and physical locations for use by news media during an emergency.</p> <p><u>Implementation:</u> The adequacy of such facilities is demonstrated.</p>
<p>G.4.a Each principal organization shall designate a spokesperson who should have access to all necessary information.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans designate a spokesperson(s) who shall have access to all necessary information.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to designate a spokesperson(s) who shall have access to all necessary information.</p>	<p><u>Plans:</u> Review has verified that plans identifying the designated spokesperson(s).</p> <p><u>Implementation:</u> Access to all necessary information is successfully demonstrated.</p>

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<p>G.4.b Each organization shall establish arrangements for timely exchange of information among designated spokespersons.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans establish arrangements for timely exchange of information among designated spokespersons.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish arrangements for timely exchange of information among designated spokespersons.</p>	<p><u>Plans:</u> Review has verified that plans establish arrangements for timely exchange of information among designated spokespersons.</p> <p><u>Implementation:</u> These arrangements are successfully demonstrated.</p>
<p>G.4.c Each organization shall establish coordinated arrangements for dealing with rumors.</p> <p>(State/Local)</p>	<p>5.b.1 OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans establish coordinated arrangements for dealing with rumors.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish coordinated arrangements for dealing with rumors.</p>	<p><u>Plans:</u> Review has verified that plans describe coordinated arrangements for dealing with rumors.</p> <p><u>Implementation:</u> These arrangements are successfully demonstrated.</p>

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<p>G.5 Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information.<sup>13</sup></p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans describe provisions to conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information.</p>	<p><u>Plans:</u> Review has verified that plans describe provisions to coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information.</p> <p><u>Implementation:</u> It is successfully demonstrated that the program is being carried out.</p>
<b>Planning Standard H</b>			
<p>H.3 Each organization shall establish an emergency operations center for use in directing and controlling response functions.</p> <p>(State/Local)</p>	<p>1.b.1 Facilities are sufficient to support the emergency response</p>	<p><u>Existing facilities:</u> Review has verified that plans describe the emergency operations center for use in directing and controlling response functions.</p> <p><u>Proposed facility:</u> Review has verified that plans provide a commitment to establish and describe an emergency operations center capable of directing and controlling response functions.</p>	<p><u>Plans:</u> Review has verified that plans describe an emergency operations center capable of directing and controlling response functions.</p> <p><u>Implementation:</u> Its use is successfully demonstrated.</p>

<sup>13</sup> Revised by FEMA GM PR-1.

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<p>H.4 Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.</p> <p>(State/Local)</p>	<p>1.a.1 OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for timely activation and staffing of the facilities and centers described in the plan.</p> <p><u>Proposed plans:</u> Review has verified that plans include a commitment to provide for timely activation and staffing of the facilities and centers described in the plan.</p>	<p><u>Plans:</u> Review has verified that plans provide for timely activation and staffing of the facilities and centers described in the plan.</p> <p><u>Implementation:</u> This timely activation and staffing is successfully demonstrated.</p>
<p>H.7 Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.</p> <p><u>Proposed plans:</u> Review has verified that plans include a commitment to provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.</p>	<p><u>Plans:</u> Review has verified that plans provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.</p> <p><u>Implementation:</u> The equipment described is verified as sufficient and functional.</p>

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<p>H.10 Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>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.</p> <p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions to inspect, inventory and operationally check emergency equipment/ instruments at least once each calendar quarter and after each use, and describe instrument reserves. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to inspect, inventory and operationally check emergency equipment/ instruments at least once each calendar quarter and after each use, and provide for instrument reserves. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.</p>	<p><u>Plans:</u> Review has verified that plans include provisions to inspect, inventory and operationally check emergency equipment/ instruments at least once each calendar quarter and after each use, and describe instrument reserves.</p> <p><u>Implementation:</u> Adherence to procedures and equipment reserves are verified. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.</p>

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<p>H.11 Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies).</p> <p>(State/Local)</p>	<p>Plans include emergency equipment inventory lists in an appendix.</p>	<p><u>Existing plans:</u> Review has verified that plans describe inventories of general categories of emergency equipment, including protective equipment, communications equipment, radiological monitoring equipment and emergency supplies.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to describe inventories of general categories of emergency equipment, including protective equipment, communications equipment, radiological monitoring equipment and emergency supplies.</p>	<p><u>Plans:</u> Plans describe inventories of general categories of emergency equipment, including protective equipment, communications equipment, radiological monitoring equipment and emergency supplies.</p> <p><u>Implementation:</u> Equipment described is verified as sufficient.</p>
<p>H.12 Each organization shall establish a central point (preferably associated with the licensee's near-Site Emergency Operations Facility), for the receipt and analysis of all field monitoring data and coordination of sample media.</p> <p>(State/Local)</p>	<p>4.a.2 Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the central point identified for the receipt and analysis of all field monitoring data and coordination of sample media.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish a central point for the receipt and analysis of all field monitoring data and coordination of sample media.</p>	<p><u>Plans:</u> Review has verified that plans describe the central point identified for the receipt and analysis of all field monitoring data and coordination of sample media.</p> <p><u>Implementation:</u> This is successfully demonstrated.</p>

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Planning Standard I			
<p>1.7 Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>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.</p> <p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations.</p>	<p><u>Plans:</u> Review has verified that plans describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations.</p> <p><u>Implementation:</u> The capability and resources are successfully demonstrated.</p>

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<p>I.8 Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessment of the actual or potential magnitude and locations of radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, and transportation, communication, monitoring equipment and estimated deployment times.</p> <p>(State/Local)</p>	<p>2.b.1 Appropriate protective action recommendation are based on available information on plant conditions, field monitoring data, and licensee and ORO does projections, as well as knowledge of onsite and offsite environmental conditions.</p> <p>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.</p> <p>4.a.2 Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.</p> <p>4.b.1 The field teams demonstrate the capability to make appropriate measurements and to collect appropriate samples (for example, food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making.</p>	<p><u>Existing plans:</u> Review has verified that plans and procedures describe, where appropriate, the methods, equipment and expertise to be used to make rapid assessment of the actual or potential radiological hazards. This shall include activation, notification means, field team composition, and transportation, communication, monitoring equipment and estimated deployment times.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop plans and procedures that describe, where appropriate, the methods, equipment and expertise to be used to make rapid assessment of the actual or potential radiological hazards. This shall include activation, notification means, field team composition, and transportation, communication, monitoring equipment and estimated deployment times.</p>	<p><u>Plans:</u> Review has verified that plans and procedures describe, where appropriate, the methods, equipment and expertise to be used to make rapid assessment of the actual or potential radiological hazards.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated. This shall include activation, notification means, field team composition, and transportation, communication, monitoring equipment and deployment times.</p>

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<p>I.9 Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as <math>10^{-7}</math> uCi/cc (micro curies per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.</p> <p>(State/Local)</p>	<p>4.a.3 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 and significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as <math>10^{-7}</math> uCi/cc (micro curies per cubic centimeter) under field conditions without interference from the presence of noble gas and background radiation.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish the capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as <math>10^{-7}</math> uCi/cc (micro curies per cubic centimeter) under field conditions without interference from the presence of noble gas and background radiation.</p>	<p><u>Plans:</u> Review has verified that plans describe the capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as <math>10^{-7}</math> uCi/cc (micro curies per cubic centimeter)* under field conditions.</p> <p><u>Implementation:</u> This capability is successfully demonstrated without interference from the presence of noble gas and background radiation.</p> <p>*Or limits specified in current guidance.</p>

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<p>I.10 Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.</p> <p>(State/Local)</p>	<p>2.b.1 Appropriate protective action recommendation are based on available information on plant conditions, field monitoring data, and licensee and ORO does projections, as well as knowledge of onsite and offsite environmental conditions.</p> <p>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 OROs plan and/or procedures.</p>	<p><u>Existing plans:</u> Review has verified that procedures describe, where appropriate, the means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements. Provisions, described in separate procedures, are made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop procedures that describe, where appropriate, the means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements. Provisions, described in separate procedures, are made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides.</p>	<p><u>Plans:</u> Review has verified that procedures describe, where appropriate, the means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements. Provisions, described in separate procedures, are made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>

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<p>I.11 Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.</p> <p>(State/Local)</p>	<p>2.b.1 Appropriate protective action recommendation are based on available information on plant conditions, field monitoring data, and licensee and ORO does projections, as well as knowledge of onsite and offsite environmental conditions.</p> <p>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.</p> <p>4.a.2 Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.</p> <p>4.b.1 The field teams demonstrate the capability to make appropriate measurements and to collect appropriate samples (for example, food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making.</p>	<p><u>Existing plans:</u> Review has verified that plans describe arrangements to locate and track the airborne radioactive plume, using either or both Federal and State resources.</p> <p><u>Proposed plans:</u> Review has verified that plans include a commitment to provide for arrangements to locate and track the airborne radioactive plume, using either or both Federal and State resources.</p>	<p><u>Plans:</u> Review has verified that plans describe arrangements to locate and track the airborne radioactive plume, using either or both Federal and State resources.</p> <p><u>Implementation:</u> These arrangements are demonstrated.</p>

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Planning Standard J			
<p>J.2 Each licensee shall make provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions.</p> <p>(State/Local)</p>		<p><u>Existing plans:</u> Review has verified that plans describe assistance provided (or state that none is required) for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to describe assistance provided (or state that none is required) for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions.</p>	<p><u>Plans:</u> Review has verified that plans describe assistance provided (or state that none is required) for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions.</p> <p><u>Implementation:</u> These provisions are successfully demonstrated.</p>
<p>J.9 Each State and local organization shall establish a capability for implementing protective measures based on protective actions guides and other criteria. This shall be consistent with the recommendations for EPA regarding exposure resulting from the passage of radioactive plumes, (EPA-400-R-92-001, May 1992) and with those of FDA/DHHS</p>	<p>2.b.2 A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PAD) for the general public (including the recommendation for the use of KI, if ORO policy).</p> <p>2.c.1 Protective action decisions are made, as</p>	<p><u>Existing plans:</u> Review has verified that plans describe the capability for implementing plume and ingestion protective measures based on protective actions guides and other criteria consistent with current EPA/FDA guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish a capability for implementing plume and ingestion protective measures based on protective actions</p>	<p><u>Plans:</u> Review has verified that plans describe the capability for implementing plume and ingestion protective measures based on protective actions guides and other criteria consistent with current EPA/FDA guidance.</p> <p><u>Implementation:</u> The implementation of these measures is successfully demonstrated.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>regarding radioactive contamination of human food and animal feeds as published in the Federal Register of August 13,1998 (63 FR 43402).</p> <p>(State/Local)</p>	<p>appropriate for special population groups.</p> <p>2.d.1 Radiological consequences for the ingestion pathway are assessed and appropriated protective action decisions are made based on the OROs planning criteria.</p> <p>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 OROs plan and/or procedures.</p> <p>3.e.1 The ORO demonstrates the availability and the appropriate use of adequate information regarding water, food supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.</p> <p>3.e.2 Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food</p>	<p>guides and other criteria consistent with current EPA/FDA guidance.</p>	

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	products, milk, and agricultural production.		
<p>J.10.a The organization's plans to implement protective measures for the plume exposure pathway shall include maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designator in Table J-1 or an equivalent uniform system described in the plan).</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>4.a.2 Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure</p>	<p><u>Existing plans:</u> Review has verified that plans include maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p>	<p><u>Plans:</u> Review has verified that plans include maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas.</p> <p><u>Implementation:</u> These maps are verified through inspection.</p>

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<p>J.10.b The organization's plans to implement protective measures for the plume exposure pathway shall include... maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format).</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans include maps showing population distribution around the nuclear facility by evacuation areas.</p> <p><u>Proposed plans:</u> The ETE has been conducted and review has verified that plans provide a commitment to incorporate maps showing population distribution around the nuclear facility by evacuation areas.</p>	<p><u>Plans:</u> Review has verified that plans include maps showing population distribution around the nuclear facility by evacuation areas.</p> <p><u>Implementation:</u> These maps are verified through inspection.</p>
<p>J.10.c The organization's plans to implement protective measures for the plume exposure pathway shall include... means for notifying all segments of the transient and resident population.</p> <p>(State/Local)</p>	<p>3.c.1 Protective action decisions are implemented for special populations other than schools within areas subject to protective actions.</p> <p>3.c.2 OROs/School officials implement protective actions for schools.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means for notifying all segments of the transient and resident population.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop the means for notifying all segments of the transient and resident population.</p>	<p><u>Plans:</u> Review has verified that plans describe the means for notifying all segments of the transient and resident population.</p> <p><u>Implementation:</u> These means are successfully verified and demonstrated.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>J.10.d The organization's plans to implement protective measures for the plume exposure pathway shall include... means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.</p> <p>(State/Local)</p>	<p>2.c.1 Protective action decisions are made, as appropriate for special population groups.</p> <p>3.c.1 Protective action decisions are implemented for special populations other than schools within areas subject to protective actions.</p> <p>3.c.2 OROs/School officials implement protective actions for schools.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.</p>	<p><u>Plans:</u> Review has verified that plans describe the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement</p> <p><u>Implementation:</u> These means are successfully demonstrated.</p>
<p>J.10.e The organization's plans to implement protective measures for the plume exposure pathway shall include... provisions for the use of radio protective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans describe provisions for the use of radio protective drugs, such as potassium iodide (KI), especially for emergency workers and institutionalized persons within the plume exposure EPZ, including the quantities, storage locations, and means of distribution of KI.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop provisions for the use of radio protective drugs, such as potassium iodide (KI), especially for emergency workers and institutionalized persons within the plume exposure EPZ, including the quantities, storage locations, and means of distribution of</p>	<p><u>Plans:</u> Review has verified that plans describe provisions for the use of radio protective drugs, such as potassium iodide (KI), especially for emergency workers and institutionalized persons within the plume exposure EPZ, including the quantities, storage locations, and means of distribution of KI.</p> <p><u>Implementation:</u> These provisions are successfully demonstrated.</p>

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	<p>2.c.1 Protective action decisions are made, as appropriate for special population groups.</p> <p>3.b.1 KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals is maintained.</p>	KI.	
<p>J.10.f State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans describe how decisions are made by the State Health Department* for administering radioprotective drugs to the general population (if applicable) during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop and describe how decisions are made by the State Health Department* for administering radioprotective drugs to the general population (if applicable) during an emergency and the pre-determined conditions under which such drugs</p>	<p><u>Plans:</u> Review has verified that plans describe how decisions are made by the State Health Department* for administering radioprotective drugs to the general population (if applicable) during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers.</p> <p><u>Implementation:</u> These methods are successfully demonstrated.</p> <p>*Or authorized agency</p>

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	<p>2.c.1 Protective action decisions are made, as appropriate for special population groups.</p> <p>3.b.1 KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals is maintained.</p>	<p>may be used by offsite emergency workers.</p>	
<p>J.10.g The organization's plans to implement protective measures for the plume exposure pathway shall include... means of relocation.</p> <p>(State/Local)</p>	<p>3.c.1 Protective action decisions are implemented for special populations other than schools within areas subject to protective actions.</p> <p>3.c.2 OROs/School officials implement protective actions for schools.</p> <p>3.d.1 Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means of relocation (evacuation) to protect the public during the plume phase.</p> <p><u>Proposed plans:</u> The ETE has been completed and review has verified that plans provide a commitment to develop the means of relocation (evacuation) to protect the public during the plume phase.</p>	<p><u>Plans:</u> Review has verified that plans describe the means of relocation (evacuation) to protect the public during the plume phase.</p> <p><u>Implementation:</u> These means are successfully demonstrated.</p>

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<p>J.10.h The organization's plans to implement protective measures for the plume exposure pathway shall include... relocation centers in host areas which are at least 5 miles, and preferably 10 miles, <u>beyond</u> the boundaries of the plume exposure emergency planning zone; (see J.12).</p> <p>(State/Local)</p>	<p>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.</p> <p>6.c.1 Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate before entering congregate care facilities.</p>	<p><u>Existing plans:</u> Review has verified that plans identify relocation (reception and/or congregate care) centers in host areas which are at least 5 miles, and preferably 10 miles, <u>beyond</u> the boundaries of the plume exposure emergency planning zone.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to identify relocation (reception and/or congregate care) centers in host areas which are at least 5 miles, and preferably 10 miles, <u>beyond</u> the boundaries of the plume exposure emergency planning zone.</p>	<p><u>Plans:</u> Review has verified that plans identify relocation (reception and/or congregate care) centers in host areas which are at least 5 miles, and preferably 10 miles, <u>beyond</u> the boundaries of the plume exposure emergency planning zone.</p> <p><u>Implementation:</u> This is verified through inspection.</p>
<p>J.10.i The organization's plans to implement protective measures for the plume exposure pathway shall include... projected traffic capacities of evacuation routes under emergency conditions.</p> <p>(State/Local)</p>	<p>Plans and procedures are developed to implement protective measures for the plume exposure pathway shall include... projected traffic capacities of evacuation routes under emergency conditions.</p>	<p><u>Existing plans:</u> Review has verified that plans describe projected traffic capacities of evacuation routes under emergency conditions.</p> <p><u>Proposed plans:</u> The ETE is completed and review has verified that plans provide a commitment to incorporate projected traffic capacities of evacuation routes under emergency conditions.</p>	<p><u>Plans:</u> Review has verified that plans describe projected traffic capacities of evacuation routes under emergency conditions.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate.</p>

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<p>J.10.j The organization's plans to implement protective measures for the plume exposure pathway shall include control of access to evacuated areas and organization responsibilities for such control.</p> <p>(State/Local)</p>	<p>3.d.1 Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.</p>	<p><u>Existing plans:</u> Review has verified that plans describe control of access into and out of evacuated areas and organization responsibilities for such control.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop measures for control of access into and out of evacuated areas and organization responsibilities for such control.</p>	<p><u>Plans:</u> Review has verified that plans describe control of access into and out of evacuated areas and organization responsibilities for such control</p> <p><u>Implementation:</u> Control and organization are successfully demonstrated.</p>
<p>J.10.k The organization's plans to implement protective measures for the plume exposure pathway shall include... identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.</p> <p>(State/Local)</p>	<p>3.d.2 Impediments to evacuation are identified and resolved.</p>	<p><u>Existing plans:</u> Review has verified that plans include identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment include identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.</p>	<p><u>Plans:</u> Review has verified that plans include identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.</p> <p><u>Implementation:</u> These means are successfully demonstrated.</p>
<p>J.10.l The organization's plans to implement protective measures for the plume exposure pathway shall include... time estimates for evacuation of various sectors</p>	<p>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</p>	<p><u>Existing plans:</u> Review has verified that plans reference the Evacuation Time Estimate report or incorporate appropriate data.</p> <p><u>Proposed plans:</u> Review has verified</p>	<p><u>Plans:</u> Review has verified that plans reference the Evacuation Time Estimate report or incorporate appropriate data.</p> <p><u>Implementation:</u> Evidence of this</p>

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<p>and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (See Appendix 4)</p> <p>(State/Local)</p>	<p>particulates.</p>	<p>that plans provide a commitment to reference the Evacuation Time Estimate report or incorporate appropriate data.</p>	<p>training has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate.</p>
<p>J.10.m The organization's plans to implement protective measures for the plume exposure pathway shall include... the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded<sup>14</sup> in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.</p> <p>(State)</p>	<p>2.b.2 A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PAD) for the general public (including the recommendation for the use of KI, if ORO policy).</p>	<p><u>Existing plans:</u> Review has verified that plans describe the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop and describe the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions.</p>	<p><u>Plans:</u> Review has verified that plans describe the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions.</p> <p><u>Implementation:</u> Use of the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions is successfully demonstrated.</p>
<p>J.11 Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public health [from</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p>	<p><u>Existing Plans:</u> Review has verified that plans include procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective</p>	<p><u>Plans:</u> Review has verified that plans include procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures such as</p>

<sup>14</sup> Manual of Protective Action Guides and Protective Actions for Nuclear Incidents”, EPA 400-R-92-001 (May 1992). (NUREG 0654 addenda #18).

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<p>consumption of contaminated foodstuffs] in the event of food contamination. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify &amp; describe procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures such as impoundment, decontamination, processing, decay, product diversion and preservation. Maps for recording survey and monitoring data, key land use data (e.g., farming, dairies, food processing plants, watersheds, water supply intake and treatment plants and reservoirs) shall be provided. Provisions for maps showing general crop information may be met by including all of the 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities within the ingestion pathway EPZ which regularly process milk products and other food or</p>	<p>2.d.1 Radiological consequences for the ingestion pathway are assessed and appropriated protective action decisions are made based on the OROs planning criteria.</p> <p>3.e.1 The ORO demonstrates the availability and the appropriate use of adequate information regarding water, food supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.</p> <p>3.e.2 Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production.</p> <p>4.b.1 The field teams demonstrate the capability to make appropriate measurements and to collect appropriate samples (for</p>	<p>measures such as impoundment, decontamination, processing, decay, product diversion and preservation. Maps for recording survey and monitoring data, key land use data are developed. Up-to-date lists of the name and location of all facilities within the ingestion pathway EPZ which regularly process milk products and other food or agricultural products originating in that EPZ are maintained.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop procedures for detecting contamination, for estimating the dose commitment consequences from the ingestion pathway and for imposing protective measures such as impoundment, decontamination, processing, decay, product diversion and preservation. Maps for recording survey and monitoring data, key land use data are developed. Up-to-date lists of the name and location of all facilities within the ingestion pathway EPZ which regularly process milk products and other food or agricultural products originating in that EPZ are maintained.</p>	<p>impoundment, decontamination, processing, decay, product diversion and preservation. Maps for recording survey and monitoring data, key land use data are developed. Up-to-date lists of the name and location of all facilities within the ingestion pathway EPZ which regularly process milk products and other food or agricultural products originating in that EPZ are maintained.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>

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<p>agricultural products originating in that EPZ shall be maintained.</p> <p>(State)</p>	<p>example, food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making.</p> <p>4.c.1 The laboratory is capable of performing required radiological analysis to support protective action decisions.</p>		
<p>J.12 Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.</p> <p>(State/Local)</p>	<p>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.</p> <p>6.c.1 Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate before entering congregate care facilities.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means for registering and monitoring of evacuees at relocation (reception and/or congregate care) centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period a minimum of 20% of all residents and transients in the plume exposure EPZ.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop the means for registering and monitoring of evacuees at relocation (reception and/or congregate care) centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period a minimum of 20% of all residents and transients in the plume exposure EPZ.</p>	<p><u>Plans:</u> Review has verified that plans describe the means for registering and monitoring of evacuees at relocation (reception and/or congregate care) centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period a minimum of 20% of all residents and transients in the plume exposure EPZ.</p> <p><u>Implementation:</u> These means are successfully demonstrated.</p>

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Planning Standard K			
<p>K.3.a Each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.</p> <p>(State/Local)</p>	<p>1.e.1 Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.</p> <p>3.a.1 The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart.</p>	<p><u>Existing plans:</u> Review has verified that plans describe provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices in accordance with current guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to provide for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices in accordance with current guidance.</p>	<p><u>Plans:</u> Review has verified that plans describe provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices in accordance with current guidance.</p> <p><u>Implementation:</u> These provisions are successfully demonstrated.</p>

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<p>K.3.b Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.</p> <p>(State/Local)</p>	<p>3.a.1 The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart.</p>	<p><u>Existing plans:</u> Review has verified that plans include procedures to ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.</p>	<p><u>Plans:</u> Review has verified that plans describe procedures to ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>
<p>K.4 Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).</p> <p>(State/Local)</p>	<p>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.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).</p>	<p><u>Plans:</u> Review has verified that plans describe the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>

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<p>K.5.a Each organization as appropriate, shall specify action levels for determining the need for decontamination.</p> <p>(State/Local)</p>	<p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans specify action levels for determining the need for decontamination.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to specify action levels for determining the need for decontamination.</p>	<p><u>Plans:</u> Review has verified that plans specify action levels for determining the need for decontamination.</p> <p><u>Implementation:</u> Use of these levels is successfully demonstrated.</p>
<p>K.5.b Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.</p> <p>(State/Local)</p>	<p>6.b.1 The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of emergency worker equipment, including vehicles.</p> <p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.</p>	<p><u>Plans:</u> Review has verified that plans describe the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.</p> <p><u>Implementation:</u> These means are successfully demonstrated.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
Planning Standard L			
<p>L.1 Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p>(State/Local)</p>	<p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans describe arrangements for a primary and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to arrange for a primary and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p>	<p><u>Plans:</u> Review has verified that plans describe arrangements for a primary and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.</p> <p><u>Implementation:</u> These arrangements are successfully demonstrated.</p>
<p>L.3 Each State shall develop lists indicating the locations of public, private and military hospitals and other emergency medical service facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical</p>		<p><u>Existing plans:</u> Review has verified that plans contain lists indicating the locations of public, private and military hospitals and other emergency medical service facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contaminated persons, and have facilities and</p>	<p><u>Plans:</u> Review has verified that plans contain lists indicating the locations of public, private and military hospitals and other emergency medical service facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contaminated persons, and have facilities and</p>

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<p>services should be able to radiologically monitor contaminated personnel, and have facilities and trained personnel able to care for contaminated injured persons.</p> <p>(State/Local)</p>		<p>trained personnel able to care for contaminated injured persons.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop lists indicating the locations of public, private and military hospitals and other emergency medical service facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contaminated persons, and have facilities and trained personnel able to care for contaminated injured persons.</p>	<p>trained personnel able to care for contaminated injured persons.</p>
<p>L.4 Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.</p> <p>(State/Local)</p>	<p>6.d.1 The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans describe arrangements and procedures for transporting victims of radiological accidents to medical support facilities in accordance with current guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop arrangements and procedures for transporting victims of radiological accidents to medical</p>	<p><u>Plans:</u> Review has verified that plans describe arrangements and procedures for transporting victims of radiological accidents to medical support facilities in accordance with current guidance.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
		support facilities in accordance with current guidance.	
Planning Standard M			
<p>M.1 Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.</p> <p>(State/Local)</p>	<p>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 OROs plan and/or procedures.</p> <p>3.f.1 Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.</p>	<p><u>Existing plans:</u> General plans and procedures for reentry and recovery describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.</p>	<p><u>Plans:</u> General plans and procedures for reentry and recovery describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.</p> <p><u>Implementation:</u> These plans and procedures are successfully demonstrated.</p>

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<p>M.3 Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.</p> <p>(State)</p>	<p>3.f.1 Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.</p>	<p><u>Existing plans:</u> Review has verified that plans describe procedures for informing members of the response organizations of the means for keeping all involved OROs informed of recovery phase/ plans/ procedures being developed, and of any changes in the organizational structure that may occur, as applicable.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop procedures for informing members of the response organizations of the means for keeping all involved OROs informed of recovery phase/ plans/ procedures being developed, and of any changes in the organizational structure that may occur, as applicable.</p>	<p><u>Plans:</u> Review has verified that plans describe procedures for informing members of the response organizations of the means for keeping all involved OROs informed of recovery phase/ plans/ procedures being developed, and of any changes in the organizational structure that may occur, as applicable.</p> <p><u>Implementation:</u> These procedures are successfully demonstrated.</p>
<p>M.4 Each plan shall establish a method for periodically estimating total population exposure.</p> <p>(State)</p>		<p><u>Existing plans:</u> Review has verified that plans describe the method for periodically estimating total population exposure.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a method for periodically estimating total population exposure.</p>	<p><u>Plans:</u> Review has verified that plans describe the method for periodically estimating total population exposure.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
Planning Standard N			
<p>N.1.a An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.</p> <p>(State/Local)</p>	<p>A successful qualifying exercise is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for exercises that test the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in current NRC and FEMA rules and guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans include provisions for exercises that test the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in current NRC and FEMA rules and guidance.</p>	<p><u>Plans:</u> Review has verified that plans include provisions for exercises that test the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities.</p> <p><u>Implementation:</u> Exercises shall be conducted as set forth in current NRC and FEMA rules and guidance.</p>
<p>N.1.b An exercise shall include mobilization of State and local personnel and resources adequate to verify</p>	<p>A successful qualifying exercise is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercises in accordance with current NRC and FEMA guidance.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercises in accordance with current NRC and FEMA guidance.</p>

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<p>the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the biennial exercise by Federal and State observers/evaluators.<sup>15</sup> The scenario should be varied from exercise to exercise such that the major elements of the plans and preparedness organizations are tested within a six-year period. Each organization should make provisions to start an exercise between 6: 00 p. m. and 4: 00 a. m. within a six-year period for exercising under various weather conditions. At least one exercise over a period of six years should be unannounced.</p> <p>(State/Local)</p>		<p><u>Proposed plans:</u> Review has verified that plans provide for exercises in accordance with current NRC and FEMA guidance.</p>	<p><u>Implementation:</u> Appropriate exercises are conducted.</p>
<p>N.2.a Communication Drills: Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly.</p>	<p>Communication drills are conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for communication drills as follows: Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be</p>	<p><u>Plans:</u> Review has verified that plans provide for communication drills as follows: Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested</p>

<sup>15</sup> Changes have been made to this criterion as specified by GM PR-1.

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local government emergency operations centers and field assessment teams shall be tested at least once every year. Communication drills shall also include the aspect of understanding the content of messages.</p> <p>(State/Local)</p>		<p>tested monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local government emergency operations centers and field assessment teams shall be tested at least once every year. Communication drills shall also include the aspect of understanding the content of messages.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for communication drills as follows: Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local government emergency operations centers and field assessment teams shall be tested at least once every year. Communication drills shall also include the aspect of understanding the content of messages.</p>	<p>monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local government emergency operations centers and field assessment teams shall be tested at least once every year. Communication drills shall also include the aspect of understanding the content of messages.</p> <p><u>Implementation:</u> These drills are successfully conducted.</p>

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<p>N.2.c Medical Emergency Drills: A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies (i.e., ambulance and offsite medical treatment facility) shall be conducted annually. The offsite portions of the medical drill may be performed as part of the required biennial<sup>16</sup> exercise.</p> <p>(State/Local)</p>	<p>Medical emergency drills are conducted prior to the qualifying exercise and a schedule for subsequent drills is established.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for medical emergency drills in accordance with current FEMA guidance involving a simulated contaminated individual which contains provisions for participation by local support services agencies (i.e., ambulance and offsite medical treatment facility) to be conducted annually. The offsite portions of the medical drill may be performed as part of the required biennial exercise.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for medical emergency drills in accordance with current FEMA guidance involving a simulated contaminated individual which contains provisions for participation by local support services agencies (i.e., ambulance and offsite medical treatment facility) to be conducted annually. The offsite portions of the medical drill may be performed as part of the required biennial exercise.</p>	<p><u>Plans:</u> Review has verified that plans provide for medical emergency drills in accordance with current FEMA guidance involving a simulated contaminated individual which contains provisions for participation by local support services agencies (i.e., ambulance and offsite medical treatment facility) to be conducted annually. The offsite portions of the medical drill may be performed as part of the required biennial exercise.</p> <p><u>Implementation:</u> These drills are successfully conducted.</p>

<sup>16</sup> Revised by FEMA GM PR-1

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<p>N.2.d Radiological Monitoring Drills: Plant environs and radiological monitoring drills (onsite and offsite) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.</p> <p>(State/Local)</p>	<p>Radiological monitoring drills are conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for annual radiological monitoring drills that include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for annual radiological monitoring drills that include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.</p>	<p><u>Plans:</u> Review has verified that plans provide for annual radiological monitoring drills that include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.</p> <p><u>Implementation:</u> These drills are successfully conducted.</p>

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<p>N.2.e Health Physics Drills: Health Physics drills shall be conducted annually by State governments with licensees to test response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment. The State drills can be conducted at any site.<sup>17</sup></p> <p>(State/Local)</p>	<p>Health physics drills are conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for annual Health Physics drills with State governments and licensees to test response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for annual Health Physics drills with State governments and licensees to test response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment.</p>	<p><u>Plans:</u> Review has verified that plans provide for annual Health Physics drills with State governments and licensees to test response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment.</p> <p><u>Implementation:</u> These drills are successfully conducted. The State drills can be conducted at any site.</p>
<p>N.3.a ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: The basic objective(s) of each drill and exercise and appropriate evaluation criteria.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the basic objective(s) of each drill and exercise and appropriate evaluation criteria based on current NRC and FEMA guidance.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the basic objective(s) of each drill and exercise and appropriate evaluation criteria based on current NRC and</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the basic objective(s) of each drill and exercise and appropriate evaluation criteria based on current NRC and FEMA guidance.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>

<sup>17</sup> Revised by FEMA GM PR-1

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		FEMA guidance.	
<p>N.3.b ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: The date(s), time period, place(s) and participating organizations.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the date(s), time period, place(s) and participating organizations.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the date(s), time period, place(s) and participating organizations.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, the date(s), time period, place(s) and participating organizations.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>
<p>N.3.c ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: The simulated events.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, identification of events that will be simulated.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, identification of events that will be simulated.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, identification of events that will be simulated.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>
<p>N.3.d ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: A time schedule of real and simulated initiating events.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a time schedule of real and simulated initiating events.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a time schedule of real and simulated initiating events.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a time schedule of real and simulated initiating events.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>N.3.e. ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>N.3.f ...The scenarios for use in exercises and drills shall include, but not be limited to, the following: A description of the arrangements for and advance materials to be provided to official observers.</p> <p>(State/Local)</p>	<p>A successful scenario is developed</p>	<p><u>Existing plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a description of the arrangements for and advance materials to be provided to official observers.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a description of the arrangements for and advance materials to be provided to official observers.</p>	<p><u>Plans:</u> Review has verified that plans provide for exercise scenarios that include, at a minimum, a description of the arrangements for and advance materials to be provided to official observers.</p> <p><u>Implementation:</u> Inclusion of these provisions is verified during the scenario review.</p>
<p>N.4 Official observers from Federal, State or local governments will observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.</p> <p>(State/Local)</p>	<p>A successful qualifying exercise is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans include provisions for Federal, State or local governments to observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan.</p> <p><u>Proposed plans:</u> Review has verified that plans include provisions for Federal, State or local governments to observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan.</p>	<p><u>Plans:</u> Review has verified that plans include provisions for Federal, State or local governments to observe, evaluate, and critique the required exercises.</p> <p><u>Implementation:</u> A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>N.5 Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.</p> <p>(State/Local)</p>	<p>A successful qualifying exercise is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe the means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop the means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.</p>	<p><u>Plans:</u> Review has verified that plans describe the means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.</p> <p><u>Implementation:</u> Evidence of this will be done in the annual plan review.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
Planning Standard O			
O.1 Each organization shall assure the training of appropriate individuals.  (State/Local)	Training for appropriate individuals is conducted.	<u>Existing plans:</u> Review has verified that plans assure the training of appropriate individuals.  <u>Proposed plans:</u> Review has verified that plans provide a commitment to assure the training of appropriate individuals.	<u>Plans:</u> Review has verified that plans assure the training of appropriate individuals.  <u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.
O.1.b Each offsite response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police and ambulance/ rescue, the training shall also be offered to the other departments who are members of the mutual aid district.  (State/Local)	Mutual aid organizations are identified and training opportunities are offered to those organizations.	<u>Existing plans:</u> Review has verified that plans assure the training of local agencies such as fire, police and ambulance/ rescue, the training shall also be offered to the other departments who are members of the mutual aid district.  <u>Proposed plans:</u> Review has verified that plans provide a commitment to assure the training of local agencies such as fire, police and ambulance/ rescue, the training shall also be offered to the other departments who are members of the mutual aid district.	<u>Plans:</u> Review has verified that plans assure the training of local agencies such as fire, police and ambulance/ rescue, the training shall also be offered to the other departments who are members of the mutual aid district.  <u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.
O.4.a Each organization shall establish training program for...directors or coordinators of the response organizations.  (State/Local)	Training for directors or coordinators of response organizations is conducted.	<u>Existing plans:</u> Review has verified that plans describe a training program for directors or coordinators of the response organizations.  <u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for directors or coordinators of the response organizations.	<u>Plans:</u> Review has verified that plans describe a training program for directors or coordinators of the response organizations.  <u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>O.4.b Each organization shall establish a training program for...accident assessment personnel.</p> <p>(State)</p>	<p>Training for accident assessment and radiological monitoring/analysis personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for accident assessment personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for accident assessment personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of accident assessment personnel.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>O.4.c Each organization shall establish a training program for... radiological monitoring/analysis personnel.</p> <p>(State)</p>	<p>Training for accident assessment and radiological monitoring/analysis personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for radiological monitoring/analysis personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for radiological monitoring/analysis personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of radiological monitoring/analysis personnel.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>O.4.d Each organization shall establish a training program for...police security and fire fighting personnel.</p> <p>(Local)</p>	<p>Training for police security and fire fighting personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for police security and fire fighting personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for police security and fire fighting personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of for police security and fire fighting personnel.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>O.4.f Each organization shall establish a training program for...first aid and rescue personnel.</p> <p>(Local)</p>	<p>Training for first aid and rescue personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for first aid and rescue personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for first aid and rescue personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of first aid and rescue personnel.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>O.4.g Each organization shall establish a training program for...local support services personnel including Civil Defense/Emergency Service personnel.</p> <p>(Local)</p>	<p>Training for local support services personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for local support services personnel including Civil Defense/Emergency Service personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for local support services personnel including Civil Defense/Emergency Service personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of local support services personnel including Civil Defense/Emergency Service personnel.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>O.4.h Each organization shall establish a training program for...medical support personnel.</p> <p>(State/Local)</p>	<p>Training for medical support personnel is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for medical support personnel.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for medical support personnel.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of medical support personnel</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>O.4.j Each organization shall establish a training program for...personnel responsible for transmission of emergency information and instructions.</p> <p>(State/Local)</p>	<p>Training for personnel responsible for transmission of emergency information and instructions is conducted.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for personnel responsible for transmission of emergency information and instructions.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for personnel responsible for transmission of emergency information and instructions.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of personnel responsible for transmission of emergency information and instructions.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>O.5 Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.</p> <p>(State/Local)</p>	<p>Re-training for personnel is developed.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for initial and annual retraining of personnel with emergency response responsibilities.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for the initial and annual retraining of personnel with emergency response responsibilities.</p>	<p><u>Plans:</u> Review has verified that plans assure the training of the initial and annual retraining of personnel with emergency response responsibilities.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
Planning Standard P			
<p>P.1 Each organization shall provide for the training of individuals responsible for the planning effort.</p> <p>(State/Local)</p>	<p>Training for personnel responsible for the planning effort.</p>	<p><u>Existing plans:</u> Review has verified that plans describe a training program for the training of individuals responsible for the planning effort.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to develop a training program for the training of individuals responsible for the planning effort.</p>	<p><u>Plans:</u> Review has verified that plans ensure that there will be initial and annual retraining of personnel with emergency response responsibilities.</p> <p><u>Implementation:</u> Evidence of this training has been provided to the FEMA Region or included in the Annual Letter of Certification, as appropriate.</p>
<p>P.2 Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.</p> <p>(State/Local)</p>	<p>Training for personnel responsible for radiological emergency response planning.</p>	<p><u>Existing plans:</u> Review has verified that plans identify specific individual(s) by title or position with the overall authority and responsibility for radiological emergency response planning</p> <p><u>Proposed plans:</u> Review has verified that plans identify specific individual(s) by title or position with the overall authority and responsibility for radiological emergency response planning.</p>	<p><u>Plans:</u> Review has verified that plans identify specific individual(s) by title or position with the overall authority and responsibility for radiological emergency response planning.</p> <p><u>Implementation:</u> Evidence of this will be in the staffing of radiological emergency response personnel.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>P.3 Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.</p> <p>(State/Local)</p>	<p>The emergency plans are updated.</p>	<p><u>Existing plans:</u> Review has verified that plans identify an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.</p> <p><u>Proposed plans:</u> Review has verified that plans identify an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.</p>	<p><u>Plans:</u> Review has verified that plans identify an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>
<p>P.4 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.</p> <p>(State/Local)</p>	<p>The plan and agreements are updated as needed.</p>	<p><u>Existing plans:</u> 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.</p> <p><u>Proposed plans:</u> The plan shall comment to updating 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.</p>	<p><u>Plans:</u> Review has verified that 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.</p> <p><u>Implementation:</u> Evidence of this plan update has been provided to the FEMA Region or included in the Annual Plan Review as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>P.5 The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.</p> <p>(State/Local)</p>	<p>The plan is updated forwarded to include all organizations and appropriate individuals.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for the emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment the emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.</p>	<p><u>Plans:</u> Review has verified that plans provide for the emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.</p> <p><u>Implementation:</u> Evidence of these updates has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate</p>
<p>P.6 Each plan shall contain a detailed listing of supporting plans and their source.</p> <p>(State/Local)</p>	<p>The plan is updated to include all supporting plans.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for a detailed listing of supporting plans and their source.</p> <p><u>Proposed plans:</u> Review has verified that plans provide a commitment to include a detailed listing of supporting plans and their source.</p>	<p><u>Plans</u> Review has verified that plans provide for a detailed listing of supporting plans and their source.</p> <p><u>Implementation:</u> Evidence of these updates has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate.</p>

<b>Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1</b>	<b>Action Needed and Applicable Exercise Evaluation Methodology Criteria<sup>10</sup></b>	<b>Interim Finding of Reasonable Assurance for Planning</b>	<b>Interim Finding of Reasonable Assurance for Preparedness</b>
<p>P.7 Each plan shall contain as an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.</p> <p>(State/Local)</p>	<p>The plan is updated to include a listing of all implementing procedures and the plan sections to be implemented by each.</p>	<p><u>Existing plans:</u> Review has verified that plans provide for an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.</p> <p><u>Proposed plans:</u> Review has verified that plans provide for an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.</p>	<p><u>Plans:</u> Review has verified that plans contain an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.</p> <p><u>Implementation:</u> Evidence of these updates has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate.</p>
<p>P.8 Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these criteria.</p> <p>(State/Local)</p>	<p>The plan table of contents and NUREG-0654 cross-reference are updated.</p>	<p><u>Existing plans:</u> Review has verified that plans contain a table of contents and NUREG-0654 cross-reference.</p> <p><u>Proposed plans:</u> Review has verified that plans contain a table of contents and NUREG-0654 cross-reference.</p>	<p><u>Plans and implementation:</u> Review has verified that plans contain an accurate table of contents and NUREG-0654 cross-reference.</p>

Evaluation Criterion NUREG 0654 FEMA-REP-1 Rev 1	Action Needed and Applicable Exercise Evaluation Methodology Criteria <sup>10</sup>	Interim Finding of Reasonable Assurance for Planning	Interim Finding of Reasonable Assurance for Preparedness
<p>P.10 Each organization shall provide for updating telephone numbers, call-down lists and maps<sup>18</sup> in emergency procedures at least quarterly.</p> <p>(State/Local)</p>	<p>The plan is updated to include a listing updating telephone numbers, call-down lists and maps<sup>19</sup></p>	<p><u>Existing plans:</u> Review has verified that plans provide for updating telephone numbers, call-down lists and maps in emergency procedures at least quarterly.</p> <p><u>Proposed plans:</u> Review has verified that that plans provide for updating telephone numbers, call-down lists and maps in emergency procedures at least quarterly.</p>	<p><u>Plans:</u> Review has verified that that plans provide for updating telephone numbers, call-down lists and maps in emergency procedures at least quarterly.</p> <p><u>Implementation:</u> Evidence of these updates has been provided to the FEMA Region or included in the Annual Plan Review, as appropriate.</p>

<sup>18</sup> Revised by FEMA GM PR-1.

<sup>19</sup> Revised by FEMA GM PR-1.

**APPENDIX 13**  
**Points of Contact**

**Applicant Points of Contact**

Site Name and Units	Licensing Contact	Alternates
Vogtle (Units 3 & 4)	Mr. J. A. "Buzz" Miller, Senior Vice President - Nuclear Development Southern Nuclear Operating Company, Inc., 40 Inverness Center Parkway, P.O. Box 1295, Birmingham, AL 35201	Wes Sparkman and Amy Aughtman, Southern Nuclear Operating Company, Inc., 40 Inverness Center Parkway, P.O. Box 1295, Birmingham, AL 35201
North Anna (Unit 3)	Mr. Eugene S. Grecheck Vice President, Nuclear Development Dominion Innsbrook Technical Center, 5000 Dominion Boulevard, Glen Allen, VA 23060-6711 Dominion.Naps3Colarai@dom.com	Regina.Borsh@dom.com  John.Hayden@dom.com  Wanda.K.Marshall@dom.com
South Texas Project (Units 3 & 4)	Gregory Gibson Manager of Regulatory Affairs for STP Units 3 and 4 4000 Avenue F, Suite A Bay City, Texas 77414 361-972-4626 GTGibson@STPEGS.com	
Bellefonte (Units 3 & 4)	Mr. Phillip Ray Sr. Project Manager Tennessee Valley Authority 1101 Market Street Chattanooga, TN 37402-2801 PMRay@tva.gov 423-751-7030	Mr. Richard Grumbir Sr. Project Manager Tennessee Valley Authority 1101 Market Street Chattanooga, TN 37402-2801 RGrumbir@tva.gov 256-308-1770
Shearon Harris (Units 2 & 3)	Mr. James Scarola Senior Vice President and Chief Nuclear Officer Progress Energy, Inc. P.O. Box 1551 Raleigh, NC 27602 919-546-4222 James.Scarola@pgnmail.com	Mr. Gary Miller and Mr. Robert Kitchen Progress Energy, Inc P.O. Box 1551 Raleigh, NC 27602 919-546-6107 Gary.Miller@pgnmail.com 919-546-6992 Robert.Kitchen@pgnmail.com
Lee	Chris Nolan Duke Energy 526 South Church Street Charlotte, NC 28201-1009 704-382-7426 MCNolan@duke-energy.com	

Site Name and Units	Licensing Contact	Alternates
Summer	Amy Moore Mail Code P-40 So. Carolina Electric and Gas PO Box 88 Jenkinsville, SC 29065 803-345-4106 AMonroe@scana.com	
Calvert Cliffs	John Price UniStar 750 E. Pratt Street Baltimore, MD 21202 410-470-5531 John.Price2@unistarnuclear.com	
Grand Gulf	Mr. Thomas Williamson Manager, GGNS COLA Project Entergy Nuclear 1340 Echelon Parkway Jackson, MS 39213 601-368-5786 TWilli2@entergy.com	
Levy	Bob Kitchen Progress Energy PO Box 1981 TPP-15 Raleigh, NC 27602-1981 919-546-6992 Robert.Kitchen@pgnmail.com	
Callaway	David Shafer Assistant Manager, Engineering AmerenUE Callaway Plant PO Box 620 Fulton, MO 65251 573-676-4722 DShafer@ameren.com	Roger Wink Supervising Engineer AmerenUE Callaway Plant PO Box 620 Fulton, MO 65251 573-676-8498 RWink@ameren.com
River Bend	Jerry Burford Manager, RBS COLA Project Entergy Nuclear 1340 Echelon Parkway Jackson, MS 39212 601-955-8050 fburfor@entergy.com	
Nine Mile Point	George Wrobel Director, Unistar Nuclear Energy 1503 Lake Road Ontario, New York 14519 585-771-3535 (o)	

Site Name and Units	Licensing Contact	Alternates
	585-315-0552 (c) George.Wrobel@unistarnuclear.com	
Bell Bend	Rocco R. Sgarro Manager - Nuclear Regulatory Affairs PPL Bell Bend, LLC 570-802-8102 (Bell Bend) 610-774-7552 (Allentown) 610-657-4667 (c) RRSgarro@pplweb.com	
Comanche Peak	Don Woodlan Manager, Nuclear Regulatory Affairs P.O. Box 1002 Glen Rose, Texas 76043 Donald.Woodlan@luminant.com 254-897-6887	
Fermi	Mr. Peter Smith 6400 N. Dixie Highway Newport, MI 48166 313-235-3341 Peter.Smith@dteenergy.com	
Victoria	Mr. Joseph Bauer Lead Licensing Engineer Exelon Generation Co. 4300 Winfield Road Warrenville, IL. 60555 630-657-3106 Joseph.Bauer@exeloncorp.com	
Turkey Point	Mr. Martin Gettler Vice President – New Nuclear Projects, Florida Power and Light Company, Juno Beach Office, 700 Universe Blvd, Juno Beach, FL 33408	Mr. William Maher Senior Director – Licensing, New Nuclear Projects, Florida Power and Light Company, Juno Beach Office, 700 Universe Blvd, Juno Beach, FL 33408
Amarillo		
Bruneau		

Contact information was provided by NRC and updates will be provided as they are recieved.

### FEMA Headquarters Points of Contact

Section Chief	Site	Contact
Albert Coons Albert.Coons@dhs.gov 202-212-2318		<b>Team Lead</b> Bonnie Sheffield Bonnie.Sheffield@dhs.gov 202-212-2120
	Callaway	Lisa Banks-Robinson Lisa.Banks-Robinson@dhs.gov 202-212-2123
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	Bellefonte	Rebecca Fontenot Rebecca.Fontenot@dhs.gov 202-212-2315
	River Bend	
	Victoria	
	Calvert Cliffs	Patricia Gardner Patricia.Gardner@dhs.gov 202-212-2314
	Comanche Peak	
	Fermi 3	
	Bell Bend	Harry Nash Harry.W.NashJr@dhs.gov 202-212-2317
	Grand Gulf	
	Shearon Harris	David Jeremy David.Jeremy@dhs.gov 202-212-2316
	Turkey point	
	Vogtle	
	Bruneau	Thomas Strother Thomas.Strother@dhs.gov 202-212-2121
	Lee	
	South Texas Project	
	Levy	Nathaniel Yates Nathaniel.Yates@dhs.gov 202-212-2125
	Nine Mile Point	
	North Anna	

## NRC Points of Contact

Branch Chief	Site	Lead Reviewer Contact
Kevin Williams Licensing & Inspection Branch 301-415-3264 Kevin.Williams@nrc.gov		Daniel M. Barss <b>Team Lead</b> Emergency Preparedness (EP) New Reactor Licensing Team 301-415-2922 Dan.Barss@nrc.gov
	River Bend	Rollie Berry General Engineer 301-415-6119 Rollie.Berry@nrc.gov
	Levy	Anthony Bowers EP Specialist 301-415-5313 Anthony.Bower@nrc.gov
	Callaway	Don Johnson Sr. EP Specialist 301-415-4040 Don.Johnson@nrc.gov
	Summer	Walter Lange EP Specialist 301-415-8028 Walter.Lange@nrc.gov
	Nine Mile Point	Steve LaVie Sr. EP Specialist 301-415-1081 Steve.Lavie@nrc.gov
	Bellefonte	Bob Moody Sr. EP Specialist 301-415-1737 Robert.Moody@nrc.gov
	South Texas Project	
	North Anna	Bruce Musico Sr. EP Specialist 301-415-2310 Bruce.Musico@nrc.gov
	Vogtle	
	Comanche Peak	Edward Robinson EP Specialist 301-415-1022

Branch Chief	Site	Lead Reviewer Contact
	Shearon Harris	Edward.Robinson@nrc.gov
	Grand Gulf	Ronald V. Schmitt EP Specialist 301-415-4082 Ronald.Schmitt@nrc.gov
	Bell Bend	Jeff Temple EP Specialist 301-415-0156 Jeffrey.Temple@nrc.gov
	Victoria	
	Calvert Cliffs	Eric Weiss Sr. EP Specialist 301-415-1104 Eric.Weiss@nrc.gov
	Fermi 3	
	Lee	Ned Wright EP Specialist 301-415-5563 Ned.Wright@nrc.gov
	Amarillo	
	Turkey Point	
	Bruneau	

## FEMA Regions Points of Contact

FEMA Regional Office	Regional Assistance Committee Chairperson	Alternates
<b>Region I</b> 99 High Street 6th Floor Boston, MA 02110	Dean Savramis 617-956-7564 Dean.Savramis@dhs.gov Fax: 617-832-4773	Vacant
<b>Region II</b> 26 Federal Plaza Room 1307 New York, NY 10278-0001	Rebecca S. Thomson 212-680-8509 Rebecca.Thomson@dhs.gov Fax: 212-680-3608	William R. Cullen 212-680-8505 William.R.Cullen@dhs.gov
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