



FEMA

Summary of Changes between Draft August 2011 and Final October 2011 Versions

Page I-6 and forward: "HSPD-8" replaced by "PPD-8"

Page I-8-9: Definition of "service animal" amended to match rule language

Previous: The term "service animal," refers to any guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

New: The term "service animal," refers to any dog that has been individually trained to do work or perform tasks for the benefit of an individual with a disability. The rule states that other animals, whether wild or domestic, do not qualify as service animals. Dogs that are not trained to perform tasks that mitigate the effects of a disability, including dogs that are used purely for emotional support, are not service animals. The final rule also clarifies that individuals with mental disabilities who use service animals that are trained to perform a specific task are protected by the ADA. The rule permits the use of trained miniature horses as alternatives to dogs, subject to certain limitations. To allow flexibility in situations where using a horse would not be appropriate, the final rule does not include miniature horses in the definition of "service animal."¹

Page II-22 and forward: Publication date of Supplement 4 amended to October 2011

Page II-30: Guidance on backup alert and notification systems amended to include NRC language

Previous: **Backup systems:** Supplement 4 to NUREG-0654/FEMA-REP-1 includes a new requirement for backup ANSs. Backup means of alert and notification will differ from facility to facility. Backup alert and notification procedures that would be implemented in multiple stages should be structured such that the population closest to the plant (e.g., within 2 miles) is alerted and notified first. The populations farther away and downwind of any potential radiological release would be covered sequentially (e.g., 2 to 5 miles, followed by downwind 5 to 10 miles, and finally the remaining population as directed by authorities). Topography, population density, existing ORO resources, and timing will be considered in judging the acceptability of backup means of alert and notification. Although circumstances may not allow this for all situations, FEMA and the NRC recommend that OROs and licensees attempt to establish backup means that will reach those in the plume exposure EPZ within a reasonable time of receiving notice of failure of the primary alert and notification system, with a recommended goal of 45 minutes.

¹ The Department of Justice published revised final regulations implementing the Americans with Disabilities Act (ADA) for title II (State and local government services) and title III (public accommodations and commercial facilities) on September 15, 2010, in the Federal Register. These requirements, or rules, clarify and refine issues that have arisen over the past 20 years and contain new, and updated, requirements, including the 2010 Standards for Accessible Design (2010 Standards).



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New: Backup systems: Supplement 4 to NUREG-0654/FEMA-REP-1 includes a new requirement for backup ANSs. Backup means of alert and notification will differ from facility to facility. The backup means may be designed so that it can be implemented using a phased approach in which the populations most at risk (e.g., within 2 miles) are alerted and notified first, followed by alerting and notification of people in less immediately affected areas (e.g., 2 to 5 miles, followed by downwind 5 to 10 miles, and finally the remaining population as directed by authorities). The backup method may have the additional capability of being employed only in the specific areas impacted when a portion of the primary ANS, such as a single siren or group of sirens within a community, fails and the extent of the affected area and population can be determined.

Page II-30: Reference to reverse 911 and Code Red deleted

Page II-78: "X" removed from Licensee applicability for Criterion J.10.d

Page II-102: N.1.b language amended to align with Supplement 4.

Previous:

An exercise shall demonstrate the key skills of response organizations to adequately respond to an incident scenario. The scenario shall be varied such that the major elements of emergency plans are tested within an eight-year exercise cycle. Each scenario variation shall be demonstrated at least once during the eight-year exercise cycle and shall include, but not be limited to, the following:

- a. Hostile action directed at the plant site involving the integration of offsite resources with onsite response;
- b. An initial classification of or rapid escalation to a Site Area Emergency or General Emergency;
- c. No radiological release or an unplanned minimal radiological release that requires the site to declare a Site Area Emergency, but does not require declaration of a General Emergency. For this scenario variation the following conditions shall apply:
 - i. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario at least once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration.
 - ii. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, staff assistance visits or other means as described in FEMA guidance.



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- iii. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to fully participate in an integrated exercise at least every 2 years to meet the requirements as specified in 44 CFR § 350.9.2

New:

An exercise shall demonstrate the key skills of response organizations to adequately respond to an incident scenario. The scenarios shall vary such that the major elements of emergency plans are exercised within an eight-year exercise cycle. Each scenario variation shall be demonstrated at least once during the eight-year exercise cycle and shall include, but not be limited to, the following:

- a. Hostile action directed at the plant site involving the integration of offsite resources with onsite response;
- b. An initial classification of or rapid escalation to a Site Area Emergency or General Emergency;
- c. No radiological release or an unplanned minimal radiological release that requires the site to declare a Site Area Emergency, but does not require declaration of a General Emergency. For this scenario variation the following conditions shall apply:
 - i. The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario at least once within the eight-year exercise cycle. State, Tribal and local response organizations have the option, and are encouraged, to participate jointly in this demonstration.
 - ii. When planning for a joint no/minimal radiological release exercise, affected State, Tribal and local jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, plan reviews, staff assistance visits or other means as described in FEMA guidance.
 - iii. If the offsite organizations elect not to participate in the licensee's required minimal or no-release exercise, they will still be obligated to meet the exercise requirements as specified in 44 CFR § 350.9.3

Page II-126: Criterion N.1.d amended to align with Supplement 4

Previous:

An exercise shall include mobilization and implementation of State and local (as appropriate) personnel and resources adequate to verify the capability and response to a large radiological release requiring ingestion pathway protective actions beyond the 10 mile EPZ at least once every 8 years. OROs shall specify who is

² This criterion amended per NUREG-0654/FEMA-REP-1, Supplement 4, (2011).

³ This criterion amended per NUREG-0654/FEMA-REP-1, Supplement 4, (2011).



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responsible for the decision-making process. OROs shall describe the organization's procedures for making PADs and implementing protective actions based upon PAGs that are consistent with EPA recommendations. OROs shall describe the process for ensuring coordination of PADs with all applicable jurisdictions.

New:

An exercise shall include mobilization and implementation of State and local (as appropriate) personnel and resources adequate to verify the capability and response to a large radiological release requiring ingestion pathway protective actions beyond the 10 mile EPZ at least once every 8 years. Organizations shall specify who is responsible for the decision-making process. OROs shall reference or include the organization's procedures for making PADs and implementing protective actions based upon PAGs that are consistent with EPA recommendations, and the process for ensuring coordination of PADs with all applicable jurisdictions.

Page II-131: Criterion N.2.3 (2) amended to match NRC language and delete reference to the post-accident sampling system.

Page III-2: Milestone table amended to move submission of draft exercise scenario to 60 days before the exercise to align with NRC rule language.

Page III-15: Language regarding use of no-release scenario amended

Previous: Additionally, this scenario is not used if the involved OROs have a Deficiency related to protective action decision making from the last exercise, regardless of whether the Deficiency has been corrected.

New: If OROs have a Deficiency related to protective action decision-making from the last exercise, regardless of whether the Deficiency has been corrected, the offsite portion of the scenario must be expanded as appropriate to drive ORO demonstration of protective action decision-making.

Page III-25: Distribution of AAR to NRC amended

Page IV-1 and IV-63: Section U, Decommissioning, deleted

Page IV-1 and IV-12: Title of Supplement 3 amended, publication date amended to October 2011

Page IV-13: Subsection titles amended to match Supplement 4