FEMA Region III – Philadelphia Radiological Emergency Preparedness Program (REPP) Overview

Topics

- REP Program Overview
- Region III REP Program Update
- Combined Licensing of New Reactors
- Proposed REP Program Changes
- HSEEP/REP Exercise Integration

Purpose & Objectives of REP

- Ensure that the public health and safety of citizens living around commercial nuclear power plants would be adequately protected in the event of an accident.

- Integrate and enhance Federal, State, Tribal, and local governments' planning, preparedness, response, and recovery capabilities for all types of radiological emergencies.

REP Program Functions

- Exercises: Conducted biennially; Evaluate ability of State and local governments to implement their plans; Submit findings to NRC for consideration during commercial nuclear power plant licensing.

- Annual Letter of Certification Review: Review and evaluate State and local government offsite Radiological Emergency Response Programs to ensure compliance with offsite planning and preparedness regulations.

- Regulatory Support: Participate in the development of rules and guidance pertaining to offsite planning and preparedness.

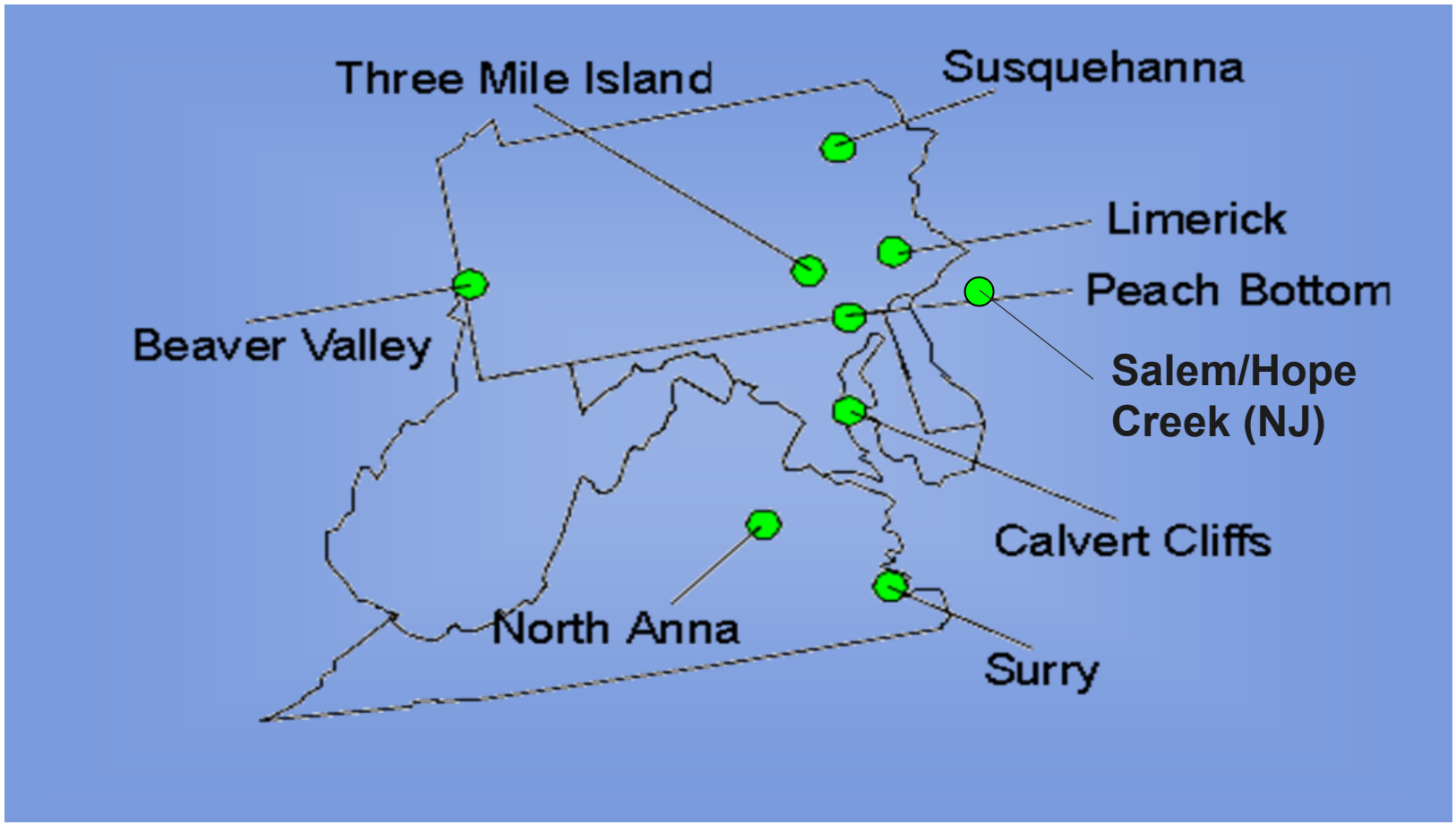
REP Program Functions

- Combined Operating License Review: Provide support to NRC in the licensing of new commercial nuclear power units.

- Staff Assistance Visits: Visit by REP Program staff to offsite response organizations in order to obtain periodic, required data in areas such as training, public education and outreach, emergency facilities and equipment, and operability of Alert & Notification Systems; or to provide technical assistance in the areas of overall REP planning and preparedness, as necessary.

FEMA REPP Regional Offices

Region III Nuclear Power Plants



FEMA RIII REP Staff

- RAC Chair/Branch Chief:
  - Darrell Hammons
- Senior Technological Hazards Specialists (Team Leaders):
  - Rick Kinard & John Price
- Site Specialists:
  - Beaver Valley – Dan Lerch
  - Limerick – Michael Shuler
  - Peach Bottom – Bob Neff
  - Susquehanna (Bell Bend) – Bart Freeman
  - TMI – Andrew Hower/Tina Lai
  - Calvert Cliffs – Andrew Hower
  - North Anna – Joe Suders
  - Surry – Marty Vyenielo
  - Salem/Hope Creek – Tina Lai

Pennsylvania Power Stations

Beaver Valley Power Station

- Parent County: Beaver
- Risk Counties: Hancock, WV & Columbiana, OH
- Support Counties: Allegheny, Butler, Lawrence & Washington

Limerick Generating Station

- Parent County: Montgomery
- Risk Counties: Berks & Chester
- Support Counties: Bucks & Lehigh

Pennsylvania Power Stations

Peach Bottom Atomic Power Station

- Parent County: York
- Risk Counties: PA: Chester & Lancaster; MD: Cecil & Harford
- Support Counties: None

Susquehanna Steam Electric Station

- Parent County: Luzerne
- Risk Counties: Columbia
- Support Counties: Lackawanna, Lycoming, Montour, Northumberland, Schuylkill, Union & Wyoming

Pennsylvania Power Stations

Three Mile Island Generating Station

- Parent County: Dauphin
- Risk Counties: Cumberland, Dauphin, Lancaster, Lebanon & York
- Support Counties: Adams, Franklin & Schuylkill

Exercises

2009	2010
Three Mile Island (TMI)	Peach Bottom
Surry	Beaver Valley
Calvert Cliffs (Ingestion)	Salem/Hope Creek (Ingestion)
Limerick	North Anna
	Susquehanna

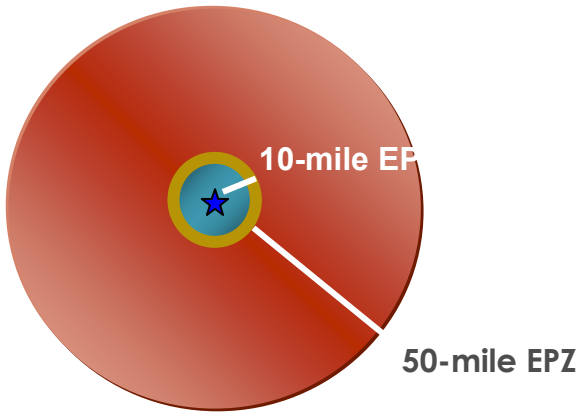
Emergency Planning Zones

10-Mile Radius

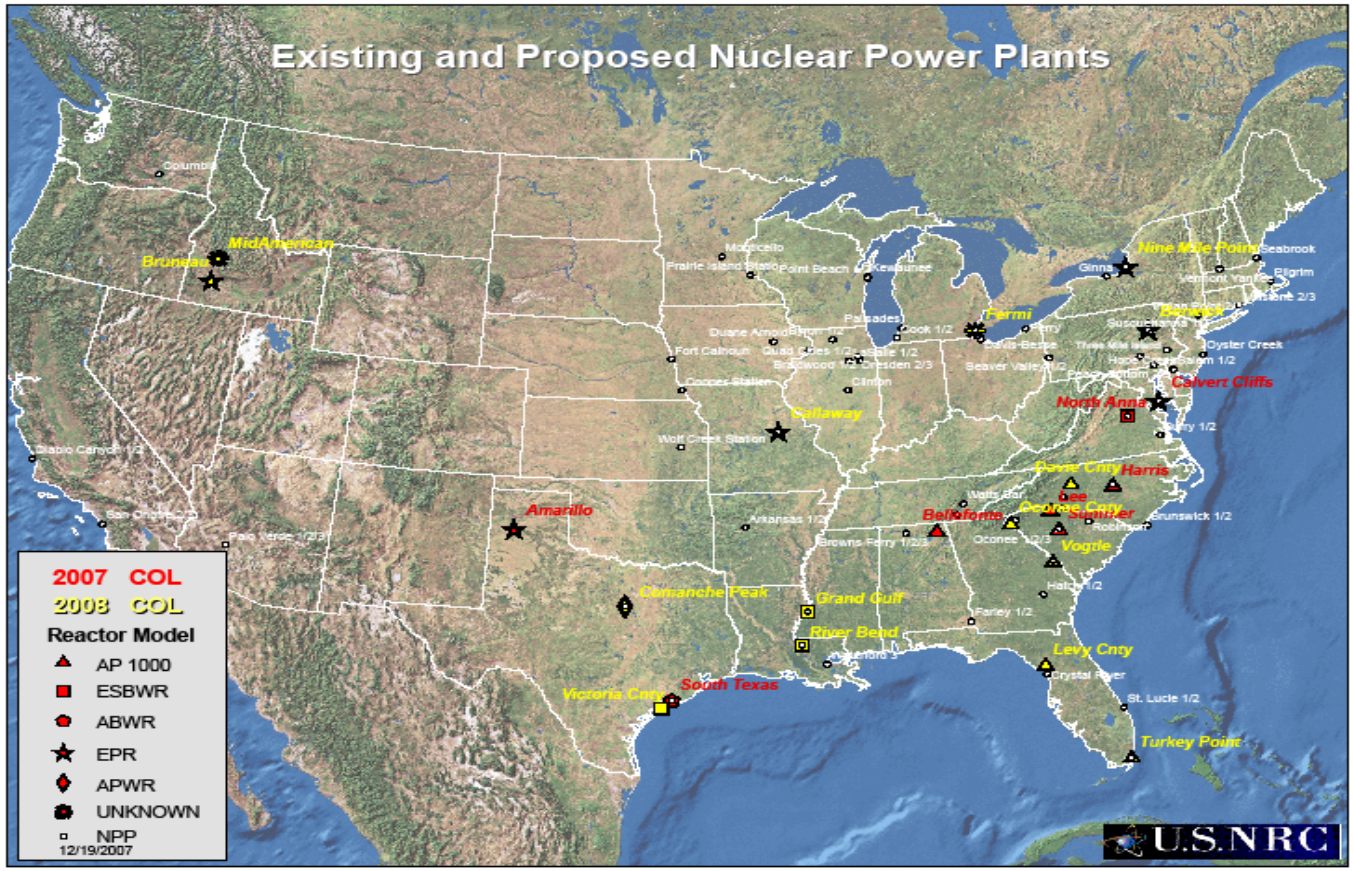
- Individuals could suffer direct radiation impact from plume exposure.
- States must participate jointly with licensee and appropriate local governments in an exercise at least every two years.

50-Mile Radius

- Individuals could suffer indirect radiation impact via food chain.
- States must participate jointly with the licensee and appropriate local governments in an exercise at least every six years.



New Reactor Licensing/Plan Review



New Reactor Licensing/Plan Review

- A combined license (COL), 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, 10 CFR Part 52.
- FEMA supports the NRC with review of the offsite State and local emergency plans and determines that those plans provide reasonable assurance for the protection of the public health and safety.

New Reactor Licensing/Plan Review

- Three sites in Region III have submitted requests to the NRC
  - Pennsylvania: Bell Bend (Susquehanna Steam Electric Station)
  - Other States:
    - North Anna Power Station (Virginia)
    - Calvert Cliffs Nuclear Power Plant (Maryland)

REP Program Proposed Revisions

- Two documents are associated with the projected policy changes:
  - Supplement 4 to NUREG 0654/FEMA-REP-1
  - FEMA REP Program Manual
- NUREG 0654 background
  - Original document and three previous supplements
- What is the REP Program Manual?
  - A source of consolidated policy and guidance
  - Serves to align FEMA offsite activities defined in 44CFR350 with the NRC regulations contained in 10CFR50 and NRC's proposed rulemaking

REP Program Proposed Revisions

- Preparing for, and responding to, Hostile Action Based events
- Aligning the REP Program with national initiatives – NIMS/ICS & HSEEP
- Ensuring more challenging and realistic exercises
  - Rapid escalation to a Site Area or General Emergency
  - A “no radiological release” scenario
- Providing for backup means to the Alert & Notification Systems

REP Program Proposed Revisions

- Public meetings conducted jointly by FEMA and NRC throughout the country
- Purpose was to summarize the proposed changes and provide information to the public as to how they can provide comments
- Public comments due by October 19th
  - Web: www.regulations.gov Docket No. FEMA-2008-0022
  - Mail: OCC FEMA
    Room 835 500 C St. SW Washington, DC 20472
  - E-mail: FEMA-POLICY@dhs.gov (include Docket No.)
  - Fax: (703) 483-2999

Program Revisions – Next Steps

- FEMA has established a Public Comment Adjudication Team
  - Members include representatives of FEMA HQ and all 10 Regions
- The intent of the team is to:
  - Ensure sustainable, measurable, and effectively-managed REP Program policy initiatives
  - Inform stakeholders and guide internal FEMA staff on REP policy procedures and considerations
  - To review, and disposition, all public comments received and make recommendations to FEMA management at the national and regional level on the policy changes to be incorporated in the documents referenced earlier

HSEEP/REP Exercise Integration

- Homeland Security Presidential Directive-8 (HSPD-8); ("National Preparedness") established a National Exercise Program (NEP)
- Provides a national program and a multi-year planning system to focus, coordinate, plan, conduct, execute, evaluate, and prioritize national security and homeland security preparedness-related exercises activities
- The NEP establishes policy guidance making the Homeland Security Exercise & Evaluation Program (HSEEP) a key pillar of the homeland security preparedness exercise program

HSEEP Principles

- HSEEP established a national standard providing:
  - Common doctrine and ‘tools’ for exercise scheduling, planning/ design, conduct, evaluation, assessment, and corrective actions
  - Consistent terminology used by all exercise planners
  - A platform for sharing information (LLIS)

HSEEP Guiding Principles

- Conduct an annual Training and Exercise Plan Workshop and develop and maintain a Multi-year Training and Exercise Plan
- Plan and conduct exercises in accordance with the guidelines set forth in HSEEP Volumes I-III and the *"HSEEP Prevention Exercises"* volume, as applicable
- Develop and submit a properly formatted After-Action Report/Improvement Plan (AAR/IP)
- Track and implement corrective actions identified in the AAR/IP

REP & HSEEP

- Nearly 30 years of REP history, provided a foundation for the development of NEP and HSEEP
- The REP exercise process is similar to, but doesn't comply with, the HSEEP process – different terminology and timelines
- Multiple requests from Federal/State/local emergency management agencies to integrate HSEEP and REPP, to achieve efficiencies

REP – HSEEP Integration Results

- Furthers nationwide standardization for exercise design, conduct, evaluation, and improvement planning
- Integrates scheduling of REP exercises with other Federal, State, and local exercises under the National Exercise Program 5-year Plans and Schedules
- Provides an opportunity to reduce Federal, State, and local exercise fatigue by combining multiple requirements into fewer total exercises
- Provides a suite of standardized tools for scheduling, planning, information sharing, evaluation/corrective action
- Does not establish additional exercise requirements for REP, or eliminate existing REP evaluation criteria

Training

- Integration will require a review and standardization of REP and HSEEP training courses to ensure any exercise training courses meet both REP and NEP requirements
- Separate REP and HSEEP training courses will not be needed
- A HSEEP evaluation course must teach the fundamentals of exercise evaluation; planning, execution, and writing
- A pilot course is scheduled in late October 2009

Integration – Next Steps

- Align exercise scheduling efforts
  - Coordinate Regional REP priorities with NEP
  - NEP FEMA Regional Training and Exercise Planning Workshops (TEPW)
- Conducting three exercises that follow the HSEEP doctrine, adhere to REP criteria, and validate REP – HSEEP integration
  - Palo Verde, AZ – March 2009
  - San Onofre, CA – September 2009
  - Browns Ferry, AL – November 2009

Integration – Next Steps

- Until such time as the REPP Program Manual is formalized, FEMA Regional REP staff and States are authorized to plan, conduct, and evaluate REP exercises using HSEEP doctrine
- HSEEP doctrine is available for use in planning and evaluating any REP exercise
  - REP HSEEP compliant Exercise Evaluation Guides (EEG) were developed and are available on LLIS
  - REP Exercise Evaluation Tool (EET) software was modified to incorporate HSEEP formatted documents (roll-out October 2009)

Questions?

FEMA