

Joint FEMA/NRC Exercise Scenario Task Force Region II – New York – Focus Group Summary

Region II Focus Group Overview

FEMA Region II hosted a focus group for 22 participants at the New York State Police Division Headquarters in Albany, New York on July 24, 2008. Focus group participants included representatives from: Orange County, NY; Oswego County, NY; Scriba Volunteer Fire Department; Constellation Energy; Entergy; New York State Emergency Management Office (NYSEMO), New York Department of Health (NYDOH), New York State Energy Research and Development Authority (NYSERDA); and Federal Emergency Management Agency (FEMA) and Nuclear Regulatory Committee (NRC) Headquarters, and Region II FEMA Radiological Emergency Preparedness (REP) Program staff. Participants discussed the proposed changes as a single focus group with two facilitators and two note takers.

Stakeholders were very engaged in the discussions and were appreciative of the opportunity to provide input on the REP Program and the work of the REP Task Force. Stakeholders stayed on topic, and there were minimal discussions outside the scope of the Task Force agenda.

The focus group lasted four hours. Stakeholders were encouraged to submit additional comments regarding focus group issues by Thursday, August 14.

Brief Summary of Stakeholder Comments

The following presents key issues raised by stakeholders during the focus group session. A complete listing of focus group comments is provided as an attachment to this Executive Summary.

- The Task Force should allow scenario designers to limit the scope of an exercise scenario to a particular classification level for the whole duration of the exercise: just an Alert, Site Area Emergency (SAE), or General Emergency (GE). This would allow players a realistic opportunity to focus on accomplishing the objectives specific to a particular classification level.
- The purpose of the exercises is to prove to the regulator that the licensees and OROs can perform their roles. There is a tradeoff in not having a GE in every exercise, in terms of losing an opportunity for players to fully perform their roles, but this is an acceptable tradeoff in order to incorporate realism into the exercise program.
- Exercise experience has led OROs to presume events and take incorrect actions during real incidents. Exercises should demonstrate what real events are like, even when that means including “downtime” and periods of inaction. If there are objectives that the Task Force wishes to see demonstrated outside of the scope of the scenario, then they should be demonstrated as OOS activities.
- By including these prescriptive scenario requirements, the Task Force seems to be making the exercise scenarios even more predictable. They should require that one exercise per cycle include a radiological release. Outside of that requirement, the scenarios for the other two exercises should not be limited by requirements.
- In order to prevent a log-jam with all of the proposed exercise requirements and still maintain the effectiveness of the program, the Task Force should expand the frequency for the hostile action-based drills to once every eight or ten years.
- REP does not need to create new criteria for incident management, because command and control of incident management is already covered. REP should use the Department of Homeland Security’s (DHS’) Homeland Security Exercise and Evaluation Program (HSEEP) exercise evaluation guides (EEGs).
- FEMA does not currently evaluate on-site. This gap needs to be addressed in the REP Program Manual (RPM) revision, particularly with regard to which elements of the now off-/on-site response FEMA will be responsible for evaluating.

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- The issue of who is responsible for exposure control decisions when off-site response organizations (OROs) go on-site is unclear. It needs to be addressed through a tabletop exercise (TTX).
- Withholding any information transmitted between responders over 800 MHz radios is impossible. Scanners will pick up any response information that comes across this line. The Task Force may need to consider this in the arena of public information for a hostile action-based event.
- Licensees and OROs are in a high level of denial about their ability to control the media and public information. Exercises are designed to assess processes; the processes are sound. Still, the notion that any of that translates into the ability to actually address all of the public information contingencies that will arise in a real event is completely wrong. This will be a dynamic process in which the joint information center (JIC) puts out some information, learns that the data was wrong, and then has to issue new information; it will be a self-corrective and very fluid process.

Proposed Improvements for Future Focus Groups

- Include law enforcement representatives in focus groups.
- Extend the meeting time to allow for an entire day of discussion.
- Provide the meeting participants with continued updates on the status of implementing the proposed changes.

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Part I: Changes to Exercise Scenario Requirements

1: The rapid escalation of Emergency Classification Levels (ECLs) and the General Emergency (GE) requirement.

- The Task Force added language about a rapidly escalating scenario. “At least one biennial exercise per cycle should involve at a minimum an initial classification at a Site Area Emergency (SAE) or rapid escalation from an Alert to an SAE.” How would the use of rapidly escalating events affect exercise play? Would a rapidly escalating event offset the predictability of requiring a GE during each exercise? Is a rapidly escalating event a technically credible scenario that needs to be practiced?

The predictability of scenarios is characterized by requiring that scenarios always progress to a GE, not by how the events escalate. Only changing the GE requirement will actually affect the predictability of exercise scenarios.

There are certain objectives that need to be accomplished in the REP exercise. From an exercise design perspective, the scenario and the escalation of the scenario must be based on the objectives to be demonstrated during an exercise.

The relationship between predictability and the quality of the exercises is not necessarily a hard linkage. Forcing exercise participants to meet all of their objectives within a four or five hour window is not even scratching the surface of a true REP response. This really only gives insight into command and control issues. The Task Force should not stress predictability as the only thing that is limiting REP exercises; the limited duration of these exercises also has a significant impact.

The proposed escalation progressions are technically credible.

- How would the rapid escalation of ECLs, initiating exercise play at any ECL, and/or skipping of an ECL(s) challenge players?

Starting at different ECLs puts pressure on certain points of the system, but also fails to drive play for numerous players. Although this may be realistic, it is also a waste of a costly resource.

- How does the requirement to reach a GE in each exercise align with the following principles:
 - Avoiding anticipatory responses associated with preconditioning of participants?
 - Reducing preconditioning or “negative training”?

There are certain objectives that cannot be achieved without progressing to a GE.

Exercises that go from a notice of unusual event (NOUE) through to a GE in a four or five hour period, and which only allow players to minimally demonstrate their capabilities at each level, do not constitute significant performance opportunities. There is more benefit to be gained by exercising realistic scenarios (i.e., ones that do not necessarily progress to a GE).

FEMA requires that certain objectives be evaluated within the exercise cycle. If they opt to change the format of the exercises, those requirements must be adapted and adjusted to the new exercise requirements.

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- Are there any negative consequences of requiring a GE at each exercise?

Healthcare organizations are very effective at managing a GE. However, the biggest failure in the healthcare organizations' demonstration of capabilities occurs when exercises stall and do not progress to a GE. These organizations are not always prepared to sustain operations at one level for an extended period of time. Designing some exercises that do not progress to the GE will give them the opportunity to test and demonstrate this facet of their capabilities.

Exercises that do not progress to GEs, but still require demonstration of the full complement of REP exercise objectives, will require the use of numerous controller injects, out-of-sequence (OOS) activities, or interviews. FEMA should allow these exercises to end where the scenario ends, rather than forcing the demonstration of "missed objectives." "Overstretching" the exercise by forcing the demonstration of objectives not targeted by the main scenario would be negative training.

The Task Force should allow scenario designers to limit the scope of an exercise scenario to a particular classification level for the whole duration of the exercise – just an Alert, SAE, or GE. This would allow players a realistic opportunity to focus on accomplishing the objectives specific to a particular classification level.

- Is there performance value from not achieving a GE at each exercise?

Not achieving a GE at each exercise adds needed realism to the exercise scenarios, which is extremely important.

The purpose of the exercises is to prove to the regulator that the licensees and OROs can perform their roles. There is a tradeoff in not having a GE in every exercise, in terms of losing an opportunity for players to fully perform their roles, but this is an acceptable tradeoff in order to incorporate realism into the exercise program.

Players can demonstrate numerous capabilities in a scenario that does not progress to a GE (e.g., command and control, dose assessment). However, they will lose the opportunity to test sheltering and evacuation capabilities in these exercises.

Having a scenario that stays at an SAE for an extended period of time will be invaluable for the players with extensive responsibilities at this level. However, other players will sit unutilized if the exercise does not progress to a GE.

Within a particular exercise, if some player/organization will not be utilized, they should not be included in the exercise at all. However, the scenario developers MUST balance this in the following exercise, by ensuring that they are included and fully utilized.

Exercise experience has led OROs to presume events and take incorrect actions during real incidents. Exercises should demonstrate what real events are like, even when that means including "downtime" and periods of inaction. If there are objectives that the Task Force wishes to see demonstrated outside of the scope of the scenario, then they should be demonstrated as OOS activities.

Any scenario that does not progress to a GE will put the onus on the exercise planners to create sufficient controller inject messages to challenge the operations personnel, who would otherwise be underutilized.

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Limiting the scope of the scenario by not progressing to a GE may create problems if it prevents Counties from being able to demonstrate certain capabilities that they wish to demonstrate.

2: Requiring varying release options and allowing a no-release scenario.

- It is recommended that varying the size of releases within the 6-year exercise cycle will make exercises more challenging and less predictable. How so? How should exercise participants be challenged?

By including these prescriptive scenario requirements, the Task Force seems to be making the exercise scenarios even more predictable. They should require that one exercise per cycle include a radiological release. Outside of that requirement, the scenarios for the other two exercises should not be limited by requirements.

Recent studies of radiological releases indicate that a radiological release exceeding Environmental Protection Agency-400 (EPA-400) protective action guidelines (PAGs) between five and ten miles is unrealistic. In addition, there does not seem to be any additional benefit of a release to this distance that players will not get from a release that exceeds EPA-400 PAGs between two and five miles.

Requiring a radiological release that exceeds EPA-400 PAGs between five and ten miles will add an additional degree of complexity to scenario development that will really tie scenario developers' hands.

The Task Force can generate the same variation by including language that licensees and OROs have the ability to change the PAGs during the exercise. Rather than requiring that the scenario include a radiological release that exceeds EPA-400 PAGs between five and ten miles, the regulations should state "require that different EPA PAGs be developed during the exercise." If this is really the goal, scenario developers can drive this through more realistic options than using a release of five to ten miles.

- How does varying the size of the release impact off-site and on-site emergency response?

The protective action decisions (PADs) that are made based on the protective action recommendations (PARs) that the licensee issues can vary significantly based upon the type and magnitude of the radiological release.

- What traditional REP functions cannot be demonstrated during a no-release scenario?

For a no-release scenario, FEMA evaluators should be adequately satisfied with a "no release" reading from the field monitoring team. Force-feeding data that does not relate to the scenario creates confusion.

The only thing that response personnel would not be able to do for a no-release scenario is bound the plume. However, this is an acceptable gap, based on the other benefits that response personnel would gain from exercising a no-release scenario.

- How could a no-release scenario avoid pre-conditioning or negative training?

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- What will be the off-site response organization (ORO) implementation challenges for exercises with varying releases and no-release?

3: Allowing varying release and meteorological conditions.

- Would varying the radiological releases and meteorological conditions between exercises (puffs vs. continuous release, ground vs. elevated release, shifting wind direction and speed) be a worthwhile way to increase realism and to challenge exercise participants?

If the regulations avoid specifying anything regarding release and meteorological conditions, then it leaves the options wide open for scenario developers to vary the exercises. This is a good thing.

If the FEMA and NRC regulations are going to require a radiological release that exceeds EPA PAGs between five and ten miles, then they will not allow for this level of variation in terms of release and meteorological conditions. There are very limited circumstances that will allow scenario developers to drive the release out this distance.

- What is the potential impact on sites that affect multiple States or multiple FEMA Regions?

4: Incorporating all-hazards into REP exercises (local hazards, natural phenomenon, and seasonal events).

- How would the incorporation of local hazards, natural events, and seasonal conditions into scenarios impact REP exercises?

The overall goal here is to have an emergency response network that is capable of handling any REP event. From an exercise standpoint, the goal is to prove to the regulators and to FEMA that the utilities and the OROs can competently fulfill their roles; the purpose of exercises is not to test every possible scenario. Scenario variation is important, but a lot of that can be addressed through training drills.

Using natural phenomena as initiating events for a REP exercise will lead to major issues.

The Task Force is already establishing constraints on what the release needs to look like. The addition of all-hazards requirements will make the scenario developers' jobs even more complicated. Keeping in mind the current emergency action levels (EALs), this will make it extremely complicated to create scenarios that progress to a GE.

If the Task Force starts adding requirements for scenarios to incorporate all-hazards, then it risks making scenarios more predictable, because scenario developers will have to meet all of the requirements from a published list.

The Task Force needs to recognize that it is resource intensive for scenario developers to get the required information to construct exercise scenarios. Requiring an "all-hazards" variation of exercise scenarios will make scenario development even more resource intensive.

Seasonal conditions are extremely difficult to implement in exercises. It is very challenging to get exercise players into the mindset that there is three to four feet of snow on the ground or very high winds, when these are not the actual conditions.

Using real meteorological data is not an option when scenario developers need to simulate a certain dose at a particular distance. Combining real meteorological data with the requirement to exceed EPA PAGs between five and ten miles is completely impossible.

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The Task Force needs to recognize that the scenario is just a vehicle to get OROs to demonstrate exercise objectives. They cannot get so wrapped up in the idea of scenario variation that they allow this to overwhelm the purpose of the exercise.

5: Requirements for Hostile Action-Based Scenarios.

- FEMA and the NRC propose that one exercise per six-year cycle “be driven by a hostile action-based scenario that focuses on unique response challenges posed to licensee and off-site response organizations.” Would hostile action-based scenarios make exercises more challenging and less predictable?

The back-and-forth variation between hostile action-based exercises with no-release scenarios and with release scenarios, as dictated by the current proposed language, will become very predictable.

If FEMA and the NRC did not require that scenario developers implement hostile action-based scenarios, then they probably would not do this on their own – especially the element of integrating incident command. This initiative will force an additional level of preparedness.

There may be other scenarios that incorporate off-site incident management, beyond hostile action-based scenarios. A tornado that does a lot of damage on-site and a large-energy steam-pipe break are two potential examples. If the overall goal is to exercise the incident management piece, the Task Force should consider these scenarios.

The Task Force could make the REP exercises even more unpredictable by breaking some of the key objectives down and not necessarily linking them to a hostile action-based exercise. Specific examples could include integrating with off-site incident command and managing the deployment of a large number of OROs on-site.

The addition of the hostile action-based exercises to the REP program will emphasize law enforcement in a way that is not emphasized in current REP exercises.

If the Task Force requires that hostile action-based scenarios progress to a GE, this will create a negative public understanding of how these events “will” progress.

At some point, the Federal Bureau of Investigation (FBI) will join the response as the incident commander. The Task Force will need to consider the implications of the FBI’s participation in REP exercises.

The Task Force really needs to consider the chain of command when evaluating the deployment of OROs on-site, especially incident command and unified command. This is a big takeaway from past drills.

The opportunity to exercise protective action decision making for a hostile action-based scenario will not be repetitive training. Certain circumstances related to a hostile action-based scenario may make it more appropriate for the local population to shelter-in-place than to evacuate.

New York conducted a hostile action-based event at Indian Point in 2002. This was part of an initiative between the NRC Commission and the former FEMA Administrator.

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In order to prevent a log-jam with all of the proposed exercise requirements and still maintain the effectiveness of the program, the Task Force should expand the frequency for the hostile action-based drills to once every eight or ten years.

- How would States with multiple sites (greater than three) be impacted by this new cycle of exercises? How does it impact the evaluation frequency matrix? What is the potential impact on sites that affect multiple States or multiple FEMA Regions? Should States that have multiple sites be considered differently than those with fewer sites?

6: Implementation of Task Force changes.

- The use of injects to: 1) simulate plant conditions, 2) drive on-site exercise play, and 3) drive off-site exercise play. Are there any objectives for a hostile action-based scenario or no-release scenario that would need to be prompted by mini-scenario controller injects? If so, what?
- What injects are needed to prompt exercise participants to consider the potential impact of a no-release scenario or a hostile action-based scenario to complete traditional REP functions?
- What are the advantages and disadvantages of using injects outside the main scenario to demonstrate the objectives of the hostile action-based scenario or traditional REP objectives? Do they cause unacceptable confusion?
- What types of guidance, planning, and training are needed to effectively implement the proposed Task Force changes?

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Part II: Changes to the Evaluation Areas to Incorporate Hostile Action-Based Scenarios

Evaluation methodologies for sites/functions (e.g., Incident Command Structure, Unified Command, ORO activities on-site) that have not historically been evaluated in REP exercises.

- **Mobilization: 1.a.** What are the facilities (e.g., Incident Command post(s) [ICP(s)], staging areas) that are unique to a hostile action-based scenario?

Because this is a hostile action-based event, some type of incident command structure will be established that is more complex than the command and control structure used for a normal REP exercise.

One unique element of a response to a nuclear plant is that OROs will establish staging areas farther away than they would for a normal incident site and will wait for the sheriff's department to arrive, assess the situation, and set up incident command.

Rescue and ambulance personnel will establish a staging area, because they will not go on-site until they receive the go-ahead from the sheriff's department. Once they go on-site, it will probably be under the command of a joint command.

- **Mobilization: 1.a.** What traditional REP functions are most likely to be short-staffed as a result of a hostile action-based scenario? How should this be demonstrated during a REP exercise?

For one specific site, half of the field monitoring team members are Special Weapons and Tactics (SWAT) team members. This will create a potential issue for field measurement and analysis during a hostile action-based scenario.

The law enforcement community may be challenged a bit on the capability to conduct consequence management while it is still involved in other response activities.

- **Mobilization: 1.a.** If a hostile action-based scenario draws resources, do OROs have plans in place or a process to identify and request additional resources to provide "REP functions" and/or implement compensatory measures?

The mutual aid process is already extensively evaluated in all-hazards exercises. This does not necessarily need to be a part of a REP exercise since mutual aid is already a part of normal emergency preparedness exercises.

- **Direction & Control: 1.c.** How should FEMA evaluate the integration of off-site and on-site responders as part of the Incident Command Structure? Who is responsible once ORO personnel are on-site?

There is definite reason for concern with the term "evaluation" for hostile action-based exercises. NRC evaluates the licensee and FEMA evaluates OROs. Who is going to evaluate New York State Police, and what gives them the power to do so?

Current REP plans do not reflect coordinating licensee actions with ORO incident command. Nuclear power plants in New York have not had an incident that required Emergency Operations Center (EOC) activation and incident command for a REP event.

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HSEEP has an EEG for on-scene incident management. REP does not need to create new criteria for incident management, because command and control of incident management is already covered – REP should use the HSEEP EEGs. These EEGs are flexible enough to work for REP.

The Task Force needs to consider the DHS Target Capabilities when evaluating what elements of the REP program need to be revamped. Perhaps REP exercises should test target capabilities, especially for hostile action-based exercises.

From the licensee perspective, the inclusion of incident command in REP is every bit as important as it is for the OROs. The presence of an ICP within the planning area has not been well incorporated into licensee plans. As a result, the first time the licensee receives a call from the incident commander (IC) saying that he wants a certain action taken on-site, it will be a bit of a shock for licensee personnel. There is a bit of learning curve in this area. If they are not already doing so, licensees need to review and update their plans to incorporate coordination with incident command.

FEMA does not currently evaluate on-site. If OROs are going to respond on-site as a part of the hostile action-based exercises, this may have to change. This needs to be addressed in the RPM revision, particularly with regard to which elements of the now off-/on-site response FEMA will be responsible for evaluating.

- **Communications equipment: 1.d.** Do OROs have sufficient communications capabilities to be able to coordinate with on-site responders? Is there a straightforward way to demonstrate the communications protocols?
- **Equipment & supplies to support operations: 1.e.** What are the challenges for providing dosimetry and KI to specialized response teams (i.e., Civil Support Team, SWAT, urban search and rescue, bomb squads, or other ancillary groups not currently identified within the plans and procedures)? How will OROs demonstrate radiological exposure control for non-traditional REP responders during an exercise or out-of-sequence drill?

Effects of hostile action-based scenarios on the protective action decision-making process.

- **Emergency Worker Exposure Control: 2.a.** Are current ORO emergency worker exposure control processes agile enough to allow for authorization (on-site or off-site) to exceed pre-authorized dose levels to support lifesaving and/or protection of valuable property associated with a hostile action-based scenario?

The issue of who is responsible for exposure control decisions when OROs come on-site is unclear and should be addressed through a TTX.

Licensees do not necessarily have a dosimeter available for every off-site responder who could potentially respond on-site, but there are processes in place to measure their dose and protect them.

When large numbers of ORO personnel have to respond on-site for an event, responders can pair up using one dosimeter.

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10 CFR 20 specifies that the licensee is responsible for doses on-site. It makes sense for the licensee to be in charge here, since they will have the most relevant information.

- Assessment and Protective Action Recommendations & Decisions for the Emergency Phase: 2.b. Hostile action-based scenarios may introduce challenges and additional risks associated with implementation of pre-designated precautionary actions and evacuation plans. What additional factors should be incorporated into the precautionary or protective action decision-making process for hostile action-based scenarios? How should officials consider the balance between inbound response vs. outbound evacuation?
- Assessment and Protective Action Recommendations & Decisions for the Emergency Phase: 2.b & Protective action decisions consideration for special populations: 2.c. Who has responsibilities for protective action decisions (PADs)? How could the protective action decision-making process be coordinated with the Incident Command Structure during hostile action-based scenarios? Should any other personnel, in addition to officials with traditional REP responsibilities, be included in the protective action decision-making process for hostile action-based scenarios?

Currently, the Chairman of the County Board of Supervisors is responsible for making PADs, based on the information that he receives from relevant sources. This will not change for a hostile action-based incident, except that the pool of relevant sources may expand to include incident command. Evaluators should be able to go to the same places to evaluate the coordination of the PADs.

During a hostile action-based event, the role of the law enforcement incident command regarding PADs will be to communicate relevant information to the EOC to allow the Chairman of the County Board of Supervisors to make appropriate decisions. FEMA should evaluate this coordination. Beyond that, communications is the only other element of incident command that needs to be evaluated.

Regardless of what the incident is, there will always be an Incident Commander. The concept of introducing incident command and an incident command post (ICP) into the REP structure, based on a hostile action-based scenario, is not that different. The only difference is an increased role for law enforcement.

The Incident Commander will not supersede the authority of the Chairman of the Board of Supervisors to make and issue PADs. If players stick to their roles and responsibilities, this should not be a significant hurdle. The Incident Commander should be informing the Board of Supervisors to allow them to make appropriate PADs.

In 1996, the New York State Governor mandated that all incidents in the state be run under the incident command system (ICS) and as a result, New York has been running REP exercises under ICS since then. Essentially, this is an expansion of unified command, where the Emergency Operations Facility (EOF) talks to the EOC.

Effects of hostile action-based scenarios on implementing protective action decisions (PADs). The Task Force recognizes additional inbound traffic flow into the emergency planning zone (EPZ) during a hostile action-based event.

- Implementation of Traffic & Access Control: 3.d. Should there be any additional responsibilities for traffic and access control point staff during a hostile action-based scenario?

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There will not necessarily be additional responsibilities for traffic and access control point staff for a hostile action-based scenario, but there will be a difference in mindset. Given the hostile action atmosphere, personnel at traffic control points will have to consider whether the approaching entity could be a reporter or could be a hostile entity. This raises the question of whether the traffic control point staff should be armed.

- Implementation of Traffic & Access Control: 3.d. What additional impediments, if any, may exist inbound or outbound to the EPZ during a hostile action-based scenario?

Changes to field measurement analysis for hostile action-based scenarios.

- Plume Phase Field Measurements and Analyses: 4.a. What measures are necessary to protect the safety of field teams from harm from adversaries given that there may be limited situational awareness during the initial phase of a hostile action-based event?

Incident command would not allow field assessment teams to go out and perform their responsibilities during a hostile action-based event, especially in a situation in which they would have to be accompanied by an armed guard. However, the licensee could probably still make PARs based upon dose assessment.

There are a lot of ways to handle this situation and still perform dose assessment. The licensees and OROs can defer field monitoring, if necessary, and still make all the decisions that they need to make.

Emergency notification and public information for hostile action-based scenarios.

- Activation of the Prompt Alert and Notification System: 5.a. In the event of a failure of electronic notification systems (e.g., tone alert radios, sirens, reverse 911), how would OROs complete public alert and notification during a hostile action-based exercise? Are personnel available to support alert and notification and a response to the hostile action-based scenario?

The alert and notification evaluation criteria need to be revised to allow for the more modern back-up notification alternatives already in use, rather than just focusing on backup route alerting.

- Emergency Information and Instructions for the Public and the Media: 5.b. What existing criteria apply and what new criteria are needed to guide the release of public information during a hostile action-based scenario, given that certain information may need to be withheld?

Law enforcement already participates in Joint Information Center (JIC). The law enforcement public information officer (PIO) is responsible for discussing law enforcement issues with the media, just as the licensee, county, and state are responsible for discussing public health and safety issues. If a public information inquiry has anything to do with the hostile action-based event, the law enforcement PIO will respond to it.

Withholding any information transmitted between responders over 800 MHz radios is impossible. Scanners will pick up any response information that comes across this line. The Task Force may need to consider this in the arena of public information for a hostile action-based event.

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The only change for public information in a hostile action-based event will be getting law enforcement involved and having them determine what law enforcement-specific information can be disseminated.

This JIC question comes up in every evaluated exercise, and it is a concern every time. Licensees and OROs are in a high level of denial about their ability to control the media and public information. Exercises are designed to assess processes; the processes are sound. Still, the notion that any of that translates into the ability to actually address all of the public information contingencies that will arise in a real event is completely wrong. This will be a dynamic process in which the JIC puts out some information, learns that the data was wrong, and then has to issue new information; it will be a self-corrective and very fluid process.

It is extremely challenging to simulate the dynamism and intensity of public information requirements within the evaluation arena of an exercise.

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Part III: Additional Areas of Discussion

Additional concerns for implementing hostile action-based and no-release scenarios.

- What are the advantages and disadvantages of integrating hostile action-based exercises into the exercise cycle, instead of requiring off-year drills with a hostile action-based initiating event?
- What traditional REP functions cannot be demonstrated during a hostile action-based scenario?
- What traditional REP functions cannot be demonstrated during an exercise where the scenario has no release?
- What will be the challenges for OROs when implementing exercises with hostile action-based scenarios? Are there any additional topics related to varying releases or hostile action-based scenarios that have not been addressed?
- Are there any additional recommendations for the Joint FEMA/NRC Exercise Scenario Task Force to strengthen the REP Program, reduce exercise pre-conditioning, and challenge exercise participants?

Evaluations ought to be based on the objectives put forth in the scenario; they should be linked directly to the objectives matrix developed for the scenario.

It appears that the Task Force's revisions are trying to stuff as much content as possible into the three biennial exercises. It might be better to add additional guidance or regulations to the drill program instead, to allow the incorporation of some of these elements without jamming them into the biennial exercises.

Expanding the length of the exercise cycle beyond six years could create problems, since there is a large turnover in the ORO personnel. A longer cycle might mean that many ORO personnel will not have sufficient REP experience.