

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

Region II Focus Group Overview

FEMA Region II hosted a focus group for 25 participants at the New Jersey State Regional Operations Intelligence Center in Trenton, New Jersey on August 5, 2008. Focus group participants included representatives from: Amergen, Cumberland County Office of Emergency Management, Exelon Corporation, New Jersey Department of Environmental Protection – Bureau of Nuclear Engineering, New Jersey State Patrol – Office of Emergency Management, Ocean County Emergency Management, Public Service Enterprise Group, Salem County Office of Emergency Management; 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 August 26, 2008.

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.

- Licensees and off-site response organizations (OROs) are concerned about the use of the word 'should' in the proposed language: "One exercise scenario per cycle should start at a Site Area Emergency (SAE) or rapidly escalate from Alert to SAE." They feel that the definition of this word and how it would be regulated are unclear. They recommend using the word 'may' instead, to avoid making this an unspecific requirement.
- Exercise participants tend to have a rote mentality towards exercise participation, because they have been trained to prepared only for the worst case scenario. A scenario that incorporates rapidly escalating events may challenge their preconceptions – as long as it does not progress to a General Emergency (GE).
- There is a finite mathematical probability of a radiological release, which is based on a highly improbable sequence of events. Continually exercising based upon this relative impossibility confuses the OROs. Maybe these "outrageous" events should be taken out-of-sequence (OOS) so that more realistic scenarios can be exercised fully during the biennial exercises.
- Requirements for varying meteorological conditions and no-release scenarios would deny Delaware (DE) the opportunity participate in any exercise held at Salem Hope Creek. In order to push the release out to the point that it affects DE, Salem Hope Creek's exercise scenarios have to include a 180 degree wind shift for the plume to affect DE.
- Local hazards (e.g., hurricanes) and other seismic events are not plausible initiating events for a REP exercise. For example, when an area is under a hurricane watch, the plant has to shut down 36 hours in advance of the hurricanes' expected arrival. In the event of a blizzard, people may not be able to be evacuated, even if a radiological event were to occur. The issue here is that at some point the off-site consequences become so powerful that the potential for a radiological release becomes irrelevant.
- Expanding the exercise cycle from six to ten years would allow scenario developers to incorporate additional 'variables' without making the progression of exercises within the cycle overly predictable.
- Revised NRC and FEMA regulations must include a section with updated definitions so that words that are subject to interpretation (e.g., should) are uniformly defined across the FEMA

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regions and for the on-site personnel. There is a great danger for misinterpretation. The definition of “reasonable assurance” MUST be included here and must be defined by a working group that includes off-site stakeholders.

- It is not clear whether the Task Force’s intent is to stretch the resources in the REP program to the extent that licensees and OROs cannot respond or simply to test resource allocation. FEMA should pay particular attention to this and clarify the hostile action-based scenario objectives accordingly.
- There is a difference between a protective action decision (PAD) and a tactical decision at the scene. FEMA needs to distinguish between these two types of decision making in the REP Program Manual (RPM). These decisions will vary based upon the scenario.
- The licensees and OROs need written guidance and evaluation criteria regarding how FEMA and the NRC want to see public information dissemination demonstrated for hostile action-based scenarios.
- FEMA and the NRC need to be careful about the evaluation criteria they create for hostile action-based scenarios. Licensee security and local law enforcement agency (LLEA) response plans are not a part of the REP program, and if they were they would be subject to the Freedom of Information Act (FOIA).

Proposed Improvements for Future Focus Groups

- The focus group was very good overall, but future focus groups should provide more read-ahead information for participants and consider providing lunch for discussions of this duration.
- While some stakeholders felt the design and structure of the meeting were beneficial, others noted that stakeholders may benefit from a brief summary of significant issues raised in prior forums.
- Stakeholders appreciated the opportunity to participate in this discussion, but many would like to see FEMA and the NRC continue to solicit stakeholder input, with additional opportunities for stakeholders to provide input prior to publishing any proposed rules or making any changes to the program.

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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?

Licensees and OROs do not have a problem with incorporating rapidly escalating events into exercise scenarios. They feel that this change will help to offset the predictability of the “normal” REP scenario and will result in less preconditioning of the emergency response organizations (EROs).

Rapid escalation to an SAE may be negative training for exercise participants. Historical events at nuclear power plants do not support jumping straight to an SAE.

It is a big leap for an event to rapidly escalate from a Notice of Unusual Event (NOUE) to an SAE. Licensees are concerned that such a scenario will create the perception that the control room made critical errors, because its failure to respond effectively would have to drive such an incident. They emphasize that scenario developers need to show clearly in rapid escalation scenarios that this progression was not the result of control room errors.

Licensees and OROs are concerned about the use of the word ‘should’ in the proposed language: “One exercise scenario per cycle should start at a SAE or rapidly escalate from Alert to SAE.” They feel that the definition of this word and how it would be regulated are unclear. They recommend using the word ‘may’ instead, to avoid making this an unspecific requirement.

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

Licensees and OROs in New Jersey (NJ) have been considering creating exercise scenarios based upon rapidly escalating events for a couple of years. They recognize that these scenarios will provide certain benefits from the standpoint of preparing participants for real world events.

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

Certain radiological releases are unrealistic and create negative training. Forcing a nuclear power plant to progress to a GE with a radiological release requires an unfathomable sequence of plant failures that is entirely unrealistic.

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

Exercise participants tend to have a rote mentality towards exercise participation, because they have been trained to prepared only for the worst case scenario. A scenario that incorporates rapidly escalating events may challenge their preconceptions – as long as it does not progress to a GE.

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?

The three proposed changes for varying radiological releases are very limiting within the current six-year cycle. The need to include these requirements is the strongest justification for extending the exercise cycle, since doing so would allow the scenario designers to be creative and potentially repeat release types within the exercise cycle.

Although the Task Force's intent to include some variation in the exercise scenarios is good, the requirement to reach the proposed off-site dose rates will cause unrealistic expectations from OROs. In reality, it is nearly impossible to exceed the Environmental Protection Agency (EPA) protective action guidelines (PAGs) to these distances, based on how licensees design, operate, and exercise their plants.

FEMA exercise scenario requirements have required "breaking" the nuclear power plants to a certain extent for so many years have helped to feed the media coverage of what "will" happen during an incident at a nuclear power plant. Exercising extreme release scenarios (e.g., exceeding EPA PAGs from five to ten miles) as OOS activities might help diminish this negative message.

There is a finite mathematical probability of a radiological release, which is based on a highly improbable sequence of events. Continually exercising based upon this relative impossibility confuses the OROs. Maybe these "outrageous" events should be taken OOS, so that more realistic scenarios can be exercised fully during the biennial exercises.

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

On-site personnel must completely fail for an exercise scenario to progress to the point that it engages the OROs. This creates a certain amount of frustration for on-site personnel, who would like to have a successful outcome in a scenario.

- What traditional REP functions cannot be demonstrated during a no-release scenario?
- How could a no-release scenario avoid pre-conditioning or negative training?
- What will be the off-site response organization (ORO) implementation challenges for exercises with varying releases and no-release?

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

Requirements for varying meteorological conditions and no-release scenarios would deny DE the opportunity to participate in any exercise held at Salem Hope Creek. In order to push the release out to the point that it affects DE, Salem Hope Creek's exercise scenarios have to include a 180 degree wind shift for the plume to affect DE.

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?

Local hazards (e.g., hurricanes) and other seismic events are not plausible initiating events for a REP exercise. For example, when an area is under a hurricane watch, the plant has to shut down 36 hours in advance of the hurricanes' expected arrival. In the event of a blizzard, people may not be able to be evacuated, even if a radiological event were to occur. The issue here is that at some point the off-site consequences become so powerful that the potential for a radiological release becomes irrelevant.

Tornadoes and straight-line winds might be able to drive a scenario that would lead to sufficient conditions to drive a REP event, but the conditions would have to be very specific.

Overall, trying to incorporate natural events into REP scenarios will ONLY lead to unrealistic exercises. If licensees and OROs implement normal response actions to a natural hazard, they will likely initiate an evacuation. As a result, there will not be much of a population in the emergency planning zone (EPZ) to protect anymore from the radiological event or to drive protective action decision making.

The Task Force is going into an unnecessary area by attempting to include natural hazards in REP exercise scenarios.

Any natural phenomenon-driven REP scenario would have to be significantly expanded to include information about non-REP off-site response activities and priorities. The licensee would not be able to write these off-site scenario components.

The Task Force should be careful not to go too far towards mandating all-hazards REP exercises. Both the licensees and the OROs already participate in other all-hazards exercises and emergency management processes. FEMA should not pack an all-hazards approach into the REP program.

The other concern with all-hazards exercises is that they take away from one of the key goals of REP exercises, giving OROs the opportunity to fully demonstrate their REP capabilities.

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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 hostile action-based scenarios are a great idea. They will lead to the involvement of a lot of different response agencies and elements in the REP program. However, the Task Force needs to address how these response elements will be evaluated and by whom.

Licensees and OROs find OOS activities confusing and unrealistic. Nevertheless, they contend that it would be more worthwhile to conduct hostile action-based drills as OOS activities, in order to avoid sacrificing the OROs’ opportunity to fully demonstrate their capabilities in biennial exercises.

The addition of a hostile action-based exercise, on top of all the other proposed scenario requirements, risks making the new exercise cycle as predictable as the current one. To combat this, the Task Force should consider allowing licensees and OROs to hold hostile action-based drills as an OOS activity the day prior to or following a force-on-force drill.

There are 17 municipalities in Oyster Creek’s EPZ, but only two of them would really participate in a hostile action-based exercise; that would leave 15 counties essentially unexercised. Due to the limited participation that hostile action-based scenarios would require from OROs, the Task Force should consider allowing hostile action-based exercises to be held with a similar frequency to ingestion-pathway exercises.

The Task Force must take a lot of elements into account before establishing the hostile action-based scenario requirements. Incorporating the hostile action-based scenario into the exercise cycle as an OOS activity would create an additional cost to the State, County, and individual OROs. If the Task Force decides to require the incorporation of the hostile action-based scenario as an additional OOS activity, then they will need to secure buy-in from these parties.

Expanding the exercise cycle from six to ten years would allow scenario developers to incorporate additional ‘variables’ without making the progression of exercises within the cycle overly predictable.

Extending the cycle is a great idea, as long as FEMA and the NRC allow licensees and OROs to repeat certain scenario types within the same cycle. The possibility for repetition will make exercise scenarios less predictable.

The real worst case hostile action-based scenario would involve an active hostage situation within the control room and a radiological release, not one of the proposed attack scenarios.

The challenges of integrating on-site security and off-site law enforcement were a big due-out from the Comprehensive Review process. But these challenges should be addressed in an off-year drill.

The REP program currently evaluates against the worst case scenario. However, the reality is that when a hostile action-based event takes place, the licensee security personnel will win.

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There is an issue of realism with the Phase III drills. These drills make the assumption that the hostile threat will be neutralized very quickly. However, this is not plausible; in reality it will take an extended period of time to “clear” the plant. Any regulations regarding hostile action-based scenarios will need to address this issue in the EOP.

The hostile action-based scenario will not add value for OROs. The OROs will not be involved in the attack portion of the response, so they will not learn anything additional from these exercises.

The Task Force needs to fully consider the political implications of requiring hostile action-based scenarios. If the scenario is built to force the on-site personnel to “lose”, this will create significant public relations issues for the licensees. As a result, it is not clear that the REP Program is the appropriate place to exercise these capabilities. Perhaps the present force-on-force program is the appropriate place to test this.

The Task Force needs to keep in mind that licensees and OROs have to answer to elected officials. The security of nuclear sites has been under a lot of government scrutiny since September 11th.

- 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?

Delaware would have almost no role in a hostile action-based exercise at Salem Hope Creek. This is a critical limitation that the Task Force needs to strongly consider.

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?

The hostile action-based exercise will create an additional exercise burden, in the form of unutilized participants. Unless there is an additional OOS activity for those OROs who are not engaged by this scenario, then they will miss a valuable training opportunity. This is not limited to hostile action; it will be true for any no-release scenario.

If FEMA requires the incorporation of controller injects to drive the demonstration of specific capabilities that are outside of the exercise scenario’s scope, it will create definite challenges in both the decision-making process and the overall evaluation process. The dual scenarios (the main scenario, along with the secondary “scenario” driven by controller injects) will invariably mix and the confusion created by this cross-contamination of information will impose an increased burden on exercise controllers.

- 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?

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- What types of guidance, planning, and training are needed to effectively implement the proposed Task Force changes?

Revised NRC and FEMA regulations must include a section with updated definitions so that words that are subject to interpretation (e.g., should) are uniformly defined across the FEMA regions and for the on-site personnel. There is a great danger for misinterpretation. The definition of Reasonable Assurance MUST be included here and must be defined by a Working Group that includes off-site stakeholders.

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

- 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?

The location of some facilities will depend on exercise conditions. For example, the incident commander (IC) will prioritize the safety of the location over functionality when establishing the ICP. As a result, FEMA will need to train its evaluators to expect that ICPs may have certain deficiencies.
- 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?

A hostile action-based scenario will require the doubling of resources for certain activities. However, mutual aid should cover surge staffing for many functions.

In terms of off-site impact, the key OROs that will be requested to support on-site response capabilities will include LLEAs, fire departments, and emergency management services (EMS).
- 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?

It is not clear whether the Task Force’s intent is to stretch the resources in the REP program to the extent that licensees and OROs cannot respond or simply to test resource allocation. FEMA should pay particular attention to this and clarify the hostile action-based scenario objectives accordingly. It may not be useful or necessary to test the all-hazards response capabilities of mutual aid resources, since these are already exhaustively tested by other exercise programs.

The immediate threat in a hostile action-based event may prevent licensee personnel from being able to go out and physically fix the plant.

During an incident at a nuclear power plant, the licensee is going to draw on assets from within the EPZ. There is an extensive pool of personnel that are trained to respond on-site. If resources from support communities are drawn in, resources from the other nuclear sites’ EPZs (within the State of New Jersey) can be called into can provide back-up. This is already done for monitoring.
- 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?

The Task Force needs to determine who will evaluate the Federal Bureau of Investigation (FBI) if they are going to participate in hostile action-based exercises. It would not be realistic to exclude them from this process. However, if the FBI assumes incident command, will this portion of the exercise be unevaluated? If not, this may have a significant effect on reasonable assurance findings.

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FEMA evaluators will need specific training and response backgrounds to evaluate certain response elements. Law enforcement will have to evaluate law enforcement personnel; firefighters will have to evaluate fire personnel.

Evaluations of the ICP will need to focus on crisp, clear, precise communications within the incident command system (ICS), rather than specific facility capabilities, which will vary. ICPs should not be evaluated to the same level as an EOC; rather, the evaluators should focus on the central concern of whether incident command successfully met its mission.

- **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?
- **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?

Licensees and OROs are concerned about how FEMA will evaluate key decision-makers with regard to PADs for hostile action-based exercises. The traditional REP Program has straightforward PADs. However, the PADs for hostile action-based scenarios will be subjective.

The evaluators need to focus on what the key decision maker considered and who was consulted. Additionally, FEMA needs to develop a tool that makes the evaluation of PADs as objective as possible.

The IC is a resource for the EOC. The IC will advise local elected officials, to help them make informed decisions.

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There is a difference between a PAD and a tactical decision at the scene. FEMA needs to distinguish between these two types of decision making in the RPM. These decisions will vary based upon the scenario.

OROs cannot make a traditional REP PAD without a protective action recommendation (PAR), but they can make tactical decisions without a PAR. However, FEMA needs to provide evaluators with revised guidance for evaluating these types of decision making processes.

FEMA should not start second-guessing the micro-scale (i.e., tactical decisions). That is something that is either best self-evaluated or not evaluated at all

The Task Force needs to keep magnitudes of scale in mind here. The high level PADs will still be made at the State EOC, rather than in the ORO EOCs. At some point in time, the scope of the IC's control will end and the State EOC's control of decision making will take over.

The State EOC can be evaluated just as it would for any other exercise. It has the ability to implement decisions based on assessments from the ICP. State EOC personnel are well trained in implementing decisions with available resources based on data coming in from the field.

The governor has the ability to make a decision without any assessment.

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?
- 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?

The Task Force needs to determine whether certain Traffic and Access Control Points need to be staffed by law enforcement personnel, or whether they can be staffed by other OROs (e.g., county roads department personnel). Additionally, the Task Force needs to determine whether the evaluation of these locations will be based on who is staffing the Traffic and Access Control Points or on how these personnel perform their duties.

Traffic and Access Control Point locations cannot be standardized easily for hostile action-based scenarios, because the circumstances of a specific event will dictate their location. A lot of those posts will be determined based on cornering and containing the threat. Each hostile action-based exercise would have to be accompanied by a training class for evaluators focusing on these locations, so that they would know what the expected actions would be. This training would have to be developed by law enforcement personnel. Overall, the burden of these scenario-specific evaluations would be significant.

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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?

There will definitely be logistical considerations with regard to where and how field teams should be deployed due to the hostile threat, in order to ensure their safety. The Task Force will have to assess how licensees and OROs can adequately address these concerns.

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?

Back-up route alerting is normally performed by trained law enforcement and fire personnel. However, the routes are pre-designated and clearly delineated. They can easily be run by mutual aid personnel, if necessary.

- 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?

The licensees and OROs need written guidance and evaluation criteria regarding how FEMA and the NRC want to see public information dissemination demonstrated for hostile action-based scenarios. Licensees and OROs do not have much experience presenting information about adversaries and death at nuclear power plants to the public.

The local, County, State, and licensee will have to coordinate effectively to ensure optimal control of public information dissemination. Realistically, the FBI and the NRC would also have roles in controlling the release of public information for an actual incident.

In the past, licensees have not been reluctant to share information with the State regarding incidents at nuclear power plants in NJ.

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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?

The lack of significant federal participation in REP exercises is a huge gap. Unless this gap is addressed, REP exercises will always suffer from a lack of realism.

Off-site stakeholders have not had enough of a role in the process of revising the RPM. FEMA and the NRC should have gotten together a small group of off-site stakeholders to help develop the proposed changes to the RPM.

The loss of power is the most likely 'event' at a nuclear power plant. If the Task Force is really striving to incorporate scenarios that mirror real world events, then it should not discount a scenario of this type. Participants should be thoroughly exercised on realistic scenarios like power outages; other scenario activities can be practiced in a tabletop exercises (TTXs).

A "one scenario fits all" approach to scenario development simply does not work. The six evaluation criteria areas cannot be evaluated in one realistic scenario. If the scenario designers write a realistic scenario, the licensees and OROs cannot meet the off-site evaluation criteria. One potential solution to this would be to revise the evaluation criteria in light of realistic scenarios.

FEMA and the NRC need to be careful about the evaluation criteria they create for hostile action-based scenarios. Licensee security and LLEA response plans are not a part of the REP program, and if they were they would be subject to FOIA. This is not acceptable.

Evidence preservation is a big concern from a law enforcement standpoint, so requirements for evidence preservation will need to be clarified for the licensee.