

## **Joint FEMA/NRC Exercise Scenario Task Force Region IX (AZ) Focus Group Summary**

### **Region IX Focus Group Overview**

FEMA Region IX hosted a focus group for 40 participants at the Russell Auditorium at Papago Park in Phoenix, Arizona on July 30, 2008. Focus group participants included representatives from: American Red Cross (ARC), Arizona Corporation Commission (ACC), Arizona Department of Administration (ADOA), Arizona Department of Economic Security (DES), Arizona Department of Environmental Quality (ADEQ), Arizona Department of Homeland Security (AZDOHS), Arizona Department of Public Safety (DPS), Arizona Department of Transportation (ADOT), Arizona Department of Water Resources (ADWR), Arizona Division of Emergency Management (ADEM), Arizona Game and Fish Department, Arizona Office of the Governor, Arizona Public Service Company (PSC)-Palo Verde, Arizona Radiation Regulatory Agency (ARRA), Buckeye Fire Department (FD), Buckeye Police Department (PD), Joint Forces Headquarters (JFHQ)-Arizona, Maricopa County Department of Emergency Management (MCDEM), Maricopa County Department of Public Health (MCDPH), Maricopa County Department of Transportation (MCDOT), Maricopa County Environmental Services Department (MCESD), Maricopa County Fire Department (MCFD), Maricopa County Sheriffs Office (MCSO), National Guard (NG) 91<sup>st</sup> Civil Support Team (CST), National Weather Service (NWS), Palo Verde Nuclear Generating Station (PVNGS), Pinal Office of Emergency Management (OEM), Federal Bureau of Investigations (FBI); and Federal Emergency Management Agency (FEMA) and Nuclear Regulatory Committee (NRC) Headquarters, and Region IX FEMA Radiological Emergency Preparedness (REP) Program staff. Participants discussed the proposed changes together as part of 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 20, 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.

- Rapid escalation would allow for testing of different portions of the response system and could also provide other agencies the opportunity to play a more significant role in the exercise.
- Allowing out-of-sequence (OOS) events would be a beneficial way to exercise specific functions that tend to be time-compressed during current exercises.
- Incorporating an all-hazards approach to exercises could provide flexibility for incorporating multiple exercise requirements within the scope of REP exercises.
- A hostile action-based scenario may require revisiting plans to ensure that command structures are appropriate for a variety of scenarios.
- Hostile action-based scenarios would incorporate additional law enforcement functions beyond what is already evaluated.
- Hostile action-based events would require an Incident Command Post (ICP), with a Unified Command (UC) approach to tactical operations.
- The biggest challenge for offsite response organizations (OROs) is not establishing plans for mutual aid, but in having the resources to exercise these plans given budget constraints and limited availability of personnel.
- A previous drill conducted with a hostile action-based scenario demonstrated the value of locating a facility representative within UC.

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- The REP Program Manual (RPM) should include language to ensure that facilities and OROs have developed plans to adequately coordinate responsibility for long-term monitoring of OROs that enter the facility during a response.
- The RPM should include language to require the coordination of information and decision-making to ensure the safety of both on- and off-site field monitoring teams (FMTs) in a hostile action-based scenario.
- If response actions cannot render the site safe within 45 minutes following a hostile action-based event, the facility may be unable to meet the existing time requirement for back-up alert and notification in the event of primary systems failures.

### **Proposed Improvements for Future Focus Groups**

One participant recommended that the focus group be scheduled in a place where participants can eat and drink and also suggested that the participants be split into smaller discussion groups.

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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?

*Task Force members discussed several of the options under consideration, including “stalling” at an SAE for several days and not escalating, as well as starting at a GE with little notice or no escalation. These scenarios would likely evaluate different functions and abilities, such as resource availability and feeding of response staff. Additional, participants inquired if the Task Force had discussed beginning an exercise at a GE and sustaining or de-escalating from that point.*

*Having variety in the exercise scenarios would be beneficial. Holding a single-day exercise limits the ability of participants to evaluate 24-hour operations and extended response scenarios. However, the logistical challenges of conducting extended or multiple-day exercises would be a burden for response organizations.*

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

*Rapid escalation would allow for testing of different portions of the response system, such as moving people from Reception Care Centers (RCCs) to shelters and establishing special-needs shelters. Rapid escalation could also provide other agencies the opportunity to play a more significant role in the exercise, as current exercises tend to make some agencies an afterthought.*

*Utilizing OOS events would be a beneficial way to exercise specific functions that tend to be time-compressed during current exercises. This could also ensure that specific functions are tested more often and that exercises are not “held up” just to ensure some activity for these functions (e.g. FMTs).*

- 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?

*The current system is not necessarily bad. While the exercises may be predictable, they offer an opportunity for thorough training of staff and more opportunities for participation. Tabletop exercises (TTXs) may present a more affordable and realistic approach to incorporating non-traditional agencies that do not typically receive extensive play during full-scale exercises (FSEs), such as schools.*

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

### **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?
- How does varying the size of the release impact off-site and on-site emergency response?
- What traditional REP functions cannot be demonstrated during a no-release scenario?

*Participants inquired how some functions would be evaluated by FEMA and the NRC during a no-release scenario, including potassium iodide (KI) distribution and establishing RCCs. Task Force members indicated that functions for evaluation are based on the jurisdiction's response plans for the presented scenario. They would expect to see the jurisdiction or facility respond in accordance with their plan. Some elements could also be demonstrated as OOS events if necessary.*

*KI distribution would be difficult or impossible to test in a no-release scenario, depending on the jurisdiction's plans. It may also be difficult to test RCCs in a no-release scenario depending on the jurisdiction's plans, so it is possible that that function may not be evaluated.*

- 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?

### **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?

### **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?

*Participants requested more information about how seasonal natural hazards could affect response during a REP event. Task Force members provided several examples, including changes to evacuation time estimates (ETEs) based on seasonal or tourism population changes, as well as larger events that may impact resource availability. During these scenarios, evaluation would identify gaps and contingencies within resource planning and could more realistically depict the resource challenges facing OROs when multiple events occur simultaneously. For example, a power outage could occur in many of the scenarios.*

*Incorporating all-hazards scenarios might be an opportunity to exercise a situation where local resources are exhausted and regional or national response assistance is needed. TTXs might help to prepare for incorporating outside resources.*

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*Participants discussed using “probabilistic risk” to develop appropriate and realistic scenarios by determining the most likely hazards that would affect the area. Task Force members indicated that risk should be included as a factor during the scenario development process, as the Task Force is looking to increase flexibility to allow scenarios that are realistic to the area being evaluated.*

*Participants inquired if incorporating an all-hazards approach to exercises could provide more flexibility for OROs hoping to incorporate multiple exercise requirements and mandates within the scope of REP exercises. Task Force members indicated that this is currently being discussed. One issue is evaluating the current credit program to determine if real events could count for participation. Another issue is determining if other exercise requirements could be met during a REP exercise. This would have to be discussed during the extent-of-play (EOP) discussions to ensure that the plans to be tested are directly tied to REP response plans.*

### **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?

*Participants requested more information about the intent of hostile action-based exercises. Task Force members indicated that the focus of the exercises was on the response to mitigating the hostile action and the off-site consequences as a whole. The idea is that the hostile action would be the initiating event, but like any other exercise, the focus would be on evaluating the response. A hostile action-based event could involve elements that are different from current REP exercises. The evaluation would identify how a hostile action-based event changes the circumstances and atmosphere of existing response plans.*

*If a hostile action-based scenario is used once every six years, a coordinating TTX should be conducted at least every three years due to staff turnover and the need for continuity in preparation for a FSE.*

*A hostile action-based scenario may have a different command structure than is currently used for REP exercises and response, which may require revisiting plans to ensure their accuracy for a variety of scenarios. Task Force members discussed the initial response to an event using the National Incident Management System (NIMS) and the Incident Command System (ICS), where the first responding unit serves as Incident Command until command is handed off to a more appropriate person or persons. Existing REP plans may designate an overall “event” incident commander, but may need to be revisited to determine who will be the incident commander for the response actions on-site. Licensees will have to look at how they fit into ICS and determine what they need to know about NIMS/ICS to fit into the response picture. There will be a learning curve as licensees determine how to apply and execute NIMS/ICS.*

*Hostile action-based scenarios would incorporate additional law enforcement functions (intelligence-gathering, investigation, recovery of evidence) beyond what is currently evaluated.*

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- 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?

*Field-based injects work well to evaluate incident command's ability to manage information flow and information verification during an event. Any field scenario would need to start earlier in the day to prevent confusion during later emergency operations center (EOC)-based activities. Field and EOC scenarios would need to be closely coordinated to prevent confusion and conflict.*

- 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

- 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?

*These events would require an ICP, with a UC approach to tactical operations. Additional NIMS-trained evaluators would be needed in the field.*

*The EOC would undergo a paradigm shift, with tactical decisions occurring in the field and the EOC functioning in a true multi-agency coordination role. Evaluators will need to ensure that the EOC is performing appropriately in a support or coordination role; however, this could be done with existing EOC evaluators.*

*The model being discussed for hostile action-based response (starting locally and building to EOC operations) is what is currently done in everyday response, so it would not be difficult to apply this approach to REP. One issue to be resolved is clarifying where protective action decisions (PADs) are determined. Traditionally, these are generated at the State level and communicated down to the local area for implementation. In a hostile action-based event, PADs may be generated in the field and communicated up to the EOC and State, due to different concerns and issues related to public safety.*

- 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?
- 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 biggest challenge for OROs is not establishing plans for mutual aid, but in having the resources to exercise these plans given budget constraints and limited availability of personnel. OROs would like to see some ability to negotiate with authorities to determine how to best demonstrate reasonable assurance while keeping exercise costs under control. Participants asked whether the “crawl-walk-run approach” had been considered for these exercises. Task Force members indicated that that process has been the general process for the successful Phase III drills. However, the Phase III drills are an industry-driven process and the Nuclear Regulatory Commission’s (NRC’s) expectation is that the drills are more than TTXs. There is nothing to prohibit a TTX in preparation for the evaluated drill.*

- 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 best situation would be to have a facility representative as part of the UC Group in the ICP. This person should have both technical knowledge and a thorough understanding of emergency response. A previous drill conducted with a hostile action-based scenario demonstrated the value of including a facility representative in UC.*

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*As the facility's radiation control program is more conservative than the State's, the facility would like to be in control of monitoring OROs if they enter the facility to provide assistance. While UC has responsibility for accountability and tracking of all assigned personnel, the long-term monitoring of OROs will need to be addressed to ensure that responders do not "slip through the cracks" and miss out on follow-up treatment and monitoring. Additionally, public health agencies may be interested in conducting "third-level" monitoring of long-term health impacts caused by exposure to both responders and their families. The RPM should include language to ensure that facilities and OROs have developed plans to adequately coordinate this responsibility.*

*Evaluators should evaluate the transition process itself as OROs enter the facility, then revert back to traditional on- and off-site evaluation roles based on the functions being performed by personnel.*

- 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?

*A hostile action-based event may introduce Federal agencies into the tactical response and current plans may not be adequate for handling communications and coordination across these lines.*

- 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?

*The facility currently has monitors and KI available for this purpose.*

### **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?

*Current REP plans only call for sheltering or evacuation decisions in the event of a release; these plans should be revisited to address PADs for a variety of possible scenarios, including no-release events. Another issue to address is when evacuations would not be recommended due to a hostile action. Plans should address a variety of circumstances and be flexible enough to allow appropriate decisions. For example, a real-life event at the utility required local law enforcement to determine and establish an appropriate evacuation area. Law enforcement and fire departments have statutory authorities to issue evacuations within the State.*



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*Plans should address appropriate credentialing and specific procedures for allowing access to restricted areas in the event of a hostile action-based event. These plans should identify what identification is required and which personnel or agencies should be granted access.*

- 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?

**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?

*Prior to fully evacuating all personnel, law enforcement may wish to interview people or investigate the hostile action. The need to investigate criminal activity could add additional tasks, which could slow down the existing plans for evacuation.*

- 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?

*If a hostile action-based event occurs during off-hours, facility personnel may need to re-enter the secured area to staff the facility's response. A delay in obtaining re-entry to the premises could affect the facility's ability to meet required activation times.*

### **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 FMTs from harm from adversaries given that there may be limited situational awareness during the initial phase of a hostile action-based event?

*FMTs will need to be a part of a UC Structure at the ICP. By checking in with the ICP on arrival, the teams will be coordinated with other operations and UC will identify appropriate measures to protect the teams while obtaining necessary field measurements. This same issue exists for on-site FMTs that may also be at risk during a hostile action-based event. The Program Manual should include language to make certain that information and decision-making is coordinated to ensure the safety of all FMTs.*

### **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?

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*The RPM language should consider replacing the 45 minute requirement with language stating that it will be completed "when it is safe to do so." If response actions cannot render the site safe within 45 minutes, the requirement may not be met.*

- 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 Joint Information Center (JIC) may not be activated at this point in the event, so many public information activities may be handled by an on-scene Public Information Officer (PIO). While there is the need to share some information with the public, this situation would be similar to other law enforcement situations where information is vetted to protect ongoing activities and investigations.*

*An additional challenge for coordinating public information is when outside agencies, including Federal agencies, are incorporated into the response. These outside agencies may not have procedures to coordinate their public information releases through the local JIC, especially when the public information component of these agencies is not on-scene or at the JIC. Once a JIC is established, all information releases should be coordinated through its processes to prevent the release of law enforcement sensitive information.*

### 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?