



**FEMA**

September 6, 2007

Kathryn C. Perkins, RN, MBA, Assistant Commissioner  
Division of Regulatory Services  
1100 West 49<sup>th</sup> Street  
Austin, TX 78756-3189

Dear Commissioner Perkins:

This letter officially informs you of the Federal Emergency Management Agency's (FEMA) identification of a Deficiency which occurred during the Comanche Peak Nuclear Power Plant Radiological Emergency Preparedness Exercise conducted on August 29, 2007. This issue was discussed during the post-exercise participants' briefing on August 30, 2007.

The Deficiency is being assessed against Hood County under Evaluation Area Criterion 2.c.1. - Protective Action Decisions for Special Populations. The Hood County Emergency Operations Center (EOC) staff failed to identify mobility impaired, special needs, hearing impaired and/or transportation dependent individuals living in the recommended evacuated zones when the protective action decisions were made during the exercise. A post-exercise review of the Special Assistance File found that there were special needs individuals living in the recommended evacuated zones that would have required assistance in evacuating.

These actions did not comply with procedures as outlined in *Hood County's Annex W, Tab C, Appendix 3, Procedures for the Law Enforcement and Traffic Control Group under a Site Area Emergency*, at Section III.B.4 which states that the Sheriff/Chief of Police are tasked to "REVIEW THE SPECIAL ASSISTANCE FILE and prepare to dispatch personnel to the necessary locations." In *Attachment G to Annex W*, the plan further states in Section V., Procedures for Evacuation, at paragraph D. that:

The Sheriff or a designated staff member will refer to the Special Assistance File kept in the Sheriff's office to determine whether any members of the community may need special attention. The Sheriff will dispatch appropriate personnel, either from among his own staff or from other County or State support agencies, to provide such assistance.

We have thoroughly reviewed and discussed this issue with FEMA Headquarters and the U.S. Nuclear Regulatory Commission. FEMA defines a Deficiency as "...an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant."



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Because of the potential impact on public health and safety, this situation should be corrected within 120 days of the exercise date through appropriate remedial actions. Please coordinate with this office, within 10 days from the date of this letter, the date and time of pertinent remedial actions and the identity of the Hood County participants.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact me at (940) 898-5199.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Hammond", written in a cursive style.

Lisa Hammond  
RAC Chairman

cc: Vanessa Quinn, FEMA HQ  
William A. Maier, NRC Region IV  
Jack Colley, GDEM  
Robert Free, DSHS-RCP  
Matthew Bozeman, CPNPP