



FEMA

APR 29 2008

Mr. John W. Droneburg, III
Director, Maryland Emergency
Emergency Management
Camp Fretterd Military Reservation
5401 Rue Saint Lo Drive
Reisterstown, MD 21136

Dear Mr. Droneburg:

This letter officially informs you of the Department of Homeland Security/Federal Emergency Management Agency's (DHS/FEMA) identification of four Deficiencies that occurred during the Peach Bottom Atomic Power Station (PBAPS) Radiological Emergency Preparedness (REP) Exercise conducted on April 22, 2008. Two of the four Deficiencies were remediated during the course of the exercise. These issues were discussed during the post-exercise participants' meeting on April 25, 2008.

A Deficiency is being assessed against Harford County Division of Emergency Operations under Evaluation Area Criterion 5.a.1 Activation of the Alert and Notification System as follows:

Condition: The Deficiency resulted because Harford County officials prepared four EAS messages (EAS #1 through EAS #4) which were not coordinated with the other jurisdictions, and which were not preceded by siren activation, as required by the county plan. (NUREG -0654, E.5, E.6, E.7, Harford County Emergency Operations Plan, Appendix 1, Radiological Emergency Operations Plan, Change 10, 02/08, pages App-1-5, App 1- Tab 1-B-2, App 1-Tab 1-B-4, App 1-Tab 1-B-9, App 1-Tab-B-12)

Corrective Action Demonstrated: During the exercise, remedial action by Harford County officials successfully demonstrated alert and notification to the public, with the required coordination with the State and Cecil County, when they sounded sirens at 1115 and broadcast the EAS message (EAS #5) at 1118.

The second Deficiency is being assessed against Cecil County Department of Emergency Services under Evaluation Area Criterion 1.c1 Direction and Control because of the following:

Condition: At 1030, the Emergency Services Director (ESD) instructed the Public Information Officer (PIO) to issue a message notifying the public of the Site Area Emergency, the Agricultural protective action recommendations, and the decision for Emergency Workers to ingest potassium iodide (KI). This message was written as an Emergency Alert System (EAS) message and broadcast

without coordination with the State and risk counties, and without benefit of the coordination of siren activation with the other risk county.

At 1042, the ESD directed the PIO to issue an EAS message with updated information. The ESD then attempted to contact MDE and Harford County, but was unsuccessful. He then directed the PIO to initiate siren activation and message broadcast at 1050 without benefit of coordination with the State and Harford County. The sirens were sounded as contact was made with MDE and Harford County, but the message was not broadcast. (NUREG-0654, A.1.d, 2.a., b.; Cecil County RERP - Section IV.B.2 o(1); Annex B, Attachment 1.1 (second paragraph).

Corrective Action Demonstrated: At 1041, a conference call was held with State and County officials, at which time appropriate siren activation and EAS message broadcast logistics were discussed and agreed upon by all parties as of 1100. Siren activation occurred at 1115 and the appropriate EAS message was broadcast at 1118, as coordinated and as specified in the plan and procedures. This issue was successfully re-demonstrated during the course of the exercise.

The third Deficiency is being assessed against Cecil County Department of Emergency Services under Evaluation Area Criterion 5.b.1 Emergency Information and Instructions for the Public and the Media as follows:

Condition: After the alert and notification sequence at 1115, Cecil County did not issue a Special News Broadcast or follow-up news release on the evacuation. The public did not receive information regarding evacuation routes, reception center locations, what to take with you, or instructions on pets. (NUREG-0654, E.5.,7., G.3.a, G.4, a.,b.,c. and Kay Goss Memorandum, dated February 2, 1999, Guidance for Providing Emergency Information and Instructions to the Public for Radiological Emergencies, page B-2, para. 1-6, 8-9, page C-3. para. 4.a, b. 4-7)

The fourth Deficiency is being assessed against Harford County Division of Emergency Operations under Evaluation Area Criterion 5.b.1 Emergency Information and Instructions for the Public and the Media as follows:

Condition: Harford County officials prepared an EAS message at 1139, which was not coordinated with the other jurisdictions, and was not preceded by siren activation, as required by the Harford County plan. This EAS message also had an inaccurate reference to a 1205 siren activation time. (NUREG-0654, E.5.,7., G.3.a, G.4, a.,b.,c. and Kay Goss Memorandum, dated February 2, 1999, Guidance for Providing Emergency Information and Instructions to the Public for Radiological Emergencies, page B-2, para. 1-6, 8-9, page C-3. para. 4.a, b. 4-7)

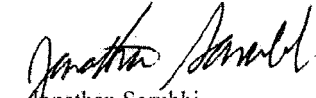
In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed these issues with the U.S. Nuclear Regulatory Commission and DHS/FEMA Region III Regional Assistance Committee members. The DHS/FEMA REP Program Manual, Exercise Annex B-2: Exercise Evaluation Methodology, 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." Because of the potential impact of a Deficiency on the protection of the public health and safety, it should be corrected within 120

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days from the date of this letter, through appropriate remedial actions, including remedial exercises, drills, or other actions.

If you have any further questions, please contact Mr. Darrell Hammons, Chairperson, Regional Assistance Committee, at (215) 931-5546 or Mr. John Price, Peach Bottom Project Officer, at (215) 931-5570.

Sincerely,


Jonathan Sarubbi
Regional Administrator