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To Whom It May Concern:

Enclosed is the After Action Report for the Peach Bottom Atomic Power Station (PBAPS) Medical Services (MS-1) Drill that was evaluated on April 10, 2012. The Darlington Emergency Medical Services (EMS) and Upper Chesapeake Health participated in the drill.

There were no "Deficiencies" and one "Areas Requiring Corrective Action (ARCA)" identified during the drill. The ARCA was successfully re-demonstrated July 18, 2012.

Based on the review of the offsite radiological emergency response plans and procedures submitted, Federal Emergency Management Agency, Region III has determined they are adequate and there is reasonable assurance they can be implemented, as demonstrated during the PBAPS MS-1 Drill.

If you have any questions, please contact Darrell Hammons at (215) 931-5546.

Sincerely,

A handwritten signature in black ink, appearing to read "MAT", written over a horizontal line.

MaryAnn Tierney
Regional Administrator

Enclosure

IX49
NRR



Peach Bottom Atomic Power Station

After Action Report/ Improvement Plan

Drill Date - April 10, 2012

Radiological Emergency Preparedness (REP) Program



FEMA

Published July 24, 2012

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Peach Bottom Atomic Power Station After Action Report/Improvement Plan

Published July 24, 2012

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EXECUTIVE SUMMARY

On April 10, 2012, an evaluated Medical Service (MS-1) Drill was conducted for the 10-mile Plume exposure pathway, Emergency Planning Zone (EPZ) around the Peach Bottom Atomic Power Station (PBAPS) by the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Region III. The most recent prior MS-1 drill for this site was conducted on April 6, 2010 (Maryland).

The purpose of the Peach Bottom MS-1 drill was to assess the State and local offsite response organization preparedness in responding to a radiological medical emergency. The drill was held in accordance with FEMA's policies and guidance concerning the exercise of State and local Radiological Emergency Response Plans (RERP) and procedures.

FEMA wishes to acknowledge the efforts of the many individuals in the State of Maryland, Harford County Division of Emergency Operations, Upper Chesapeake Health and the Darlington Emergency Medical Services (EMS) who were evaluated during this exercise.

Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility as volunteers providing vital emergency services twenty four (24) hours a day to the communities of which they live. Cooperation and teamwork of all the participants was observed during this exercise.

This report contains the final evaluation of the MS-1 drill. The State of Maryland, the local organizations, demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Deficiencies, and one (1) Areas Requiring Corrective Action (ARCAs) that was successfully re-demonstrated on July 18, 2012 identified as a result of this exercise.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

Peach Bottom Atomic Power Station

Type of Exercise

Drill

Exercise Date

April 10, 2012

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

Scenario Type

Radiological Emergency

1.2 Exercise Planning Team Leadership

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1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Peach Bottom Atomic Power Station drill:

Risk Jurisdictions

Harford County, Division of Emergency Operations

Private Organizations

Darlington Emergency Medical Services (EMS)

Upper Chesapeake Health

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

On December 7, 1979, the President directed the Federal Emergency Management Agency (FEMA) to assume the lead responsibility for all off-site nuclear planning and response. FEMA's activities were conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

44 CFR 350 establishes the policies and procedures for FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local government participation in joint exercises with licensees. FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- A. Taking the lead in offsite emergency planning and in the review and evaluation of Radiological Emergency Response Plans (RERPs) and procedures developed by State and local governments;
- B. Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- C. Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and
- D. Coordinating the activities of the following Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Commerce,
 - U.S. Nuclear Regulatory Commission,
 - U.S. Environmental Protection Agency,
 - U.S. Department of Energy,

-
- U.S. Department of Health and Human Services,
 - U.S. Department of Transportation,
 - U.S. Department of Agriculture,
 - U.S. Department of the Interior, and
 - U.S. Food and Drug Administration.

Representatives of these agencies serve on the Region III Radiological Assistance Committee (RAC), which is chaired by FEMA. A REP Medical Services drill was conducted April 10, 2012, to assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving Peach Bottom Atomic Power Station. The purpose of this exercise report is to present the drill results and findings on the performance of the off-site response organizations (OROs) during a simulated radiological emergency involving a contaminated injured individual.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region III Radiological Assistance Committee (RAC) Chairperson and approved by FEMA Headquarters. These reports are provided to the NRC and participating States. State and local governments utilize the findings contained in these reports for the purposes of planning, training, and improving emergency response capabilities.

The criteria utilized in the FEMA evaluation process are contained in the following:

A. NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980;

B. Radiological Emergency Preparedness Program Manual, April 2012

Section 1 of this report, entitled "Exercise Overview", presents the "Exercise Planning Team" and the "Participating Organizations".

Section 2 is titled "Exercise Design Summary", and includes the "Purpose and Design", "Exercise Objectives, Capabilities, and Activities", and the "Scenario Summary".

Section 3 of this report, entitled "Analysis of Capabilities", presents detailed "Exercise Evaluation and Results" information on the demonstration for each jurisdiction or functional entity evaluated in a jurisdiction-based, issue-only format (Criteria Evaluation Summaries).

Section 4, "Conclusion", is a description of the Region's overall assessment of the capabilities of the participating organizations. It also presents information on planning issues (both new planning issues identified during this exercise and resolved planning issues identified during previous exercises).

This section also contains:

(1) descriptions of all Deficiencies and Areas Requiring Corrective Action (ARCAs) assessed during this exercise, recommended corrective actions, and the Tribal, State, and local governments' schedule of corrective actions for each identified exercise issue and

(2) descriptions of ARCAs assessed during previous exercises and resolved at this exercise, including the corrective action demonstrated, as well as ARCAs assessed during previous exercises and scheduled for demonstration at this exercise which remain unresolved.

The final section of the report is comprised of the appendices, which present the following supplementary information: Improvement Plan, Exercise Timeline, Exercise Evaluators and Team Leaders, Acronyms and Abbreviations, and Exercise Plan as required.

The following is a basic description of the plume exposure Emergency Planning Zone (EPZ). Exelon Nuclear owns and operates the Peach Bottom Atomic Power Station (PBAPS). The station consists of one 40-megawatt (MW), high-temperature, gas-cooled reactor (Unit 1), decommissioned in October 1974, and two operating boiling water reactors (Units 2 and 3) rated at 1,065 MW per unit. The operating licenses for the facility were granted in October 1973 (Unit 2) and July 1974 (Unit 3); commercial operation began at the site in July 1974 (Unit 2) and December 1974 (Unit 3).

The coordinates of the plant site are 39°45'32" north (latitude) by 76°16'9" west (longitude). The site consists of 620 acres located on the west shore of Conowingo Pond, a reservoir formed by the backwater of the Conowingo Dam on the Susquehanna River. The site is primarily in Peach Bottom Township, York County, Pennsylvania; a small portion of the property lies in

Lancaster County in southeastern Pennsylvania near the mouth of Rock Run Creek. The minimum exclusion distance (distance from the center point of the reactor vessel to the site area boundary) specified for the PBAPS is 2,700 feet. Exelon Nuclear owns all the land within the exclusion area; there are no private residences on site.

The plant is located about 38 miles north-northeast of Baltimore, Maryland; 45 miles southeast of Harrisburg, Pennsylvania; and 20 miles south-southeast of Lancaster, Pennsylvania. The nearest communities are Delta, Pennsylvania, and Cardiff, Maryland, which are located approximately four and five miles west-southwest of the site, respectively. There are 97 sirens providing coverage for the 10-mile EPZ; 65 are in Pennsylvania. Soils of the Manor-Glenelg Association predominate in the site area. These soils, which are generally underlain by schist or phyllite, are shallow to moderately deep and are found on moderate to very steep slopes. The general topography of the site is hilly, with elevations ranging from 110 feet to over 460 feet above mean sea level (MSL); the plant is 116 feet above MSL.

The site is characterized by broad ridge tops and steep hillsides along the river. The climate in this area of York County is mild but humid. Prevailing winds are from the west. The average rainfall is approximately 40.5 inches, and the average annual temperature is 52.8° Fahrenheit. The area in the immediate vicinity of the plant is mostly agricultural. There are no commercial airports within a 10-mile radius. The closest major airport is in Harrisburg, about 50 miles northwest of the site. A smaller airport servicing commuter and private aircraft is located in Lancaster, about 25 miles north of the site. No public highways pass through the plant, and no major arterial highways pass near it. Access to the plant is by two roads: one, from the nearby town of Delta, leads to the decommissioned Unit 1 area and Information Center; the other passes north of Delta and enters the plant area near Units 2 and 3.

The 10-mile EPZ for PBAPS, with a total risk population of approximately 57,645, covers the following jurisdictions:

Commonwealth of Pennsylvania

Chester County

West Nottingham Township

Lancaster County

Drumore Township

East Drumore Township

Fulton Township
Little Britain Township
Martic Township
Providence Township
Quarryville Borough
York County
Delta Borough
Peach Bottom Township
Fawn Township
Fawn Grove Borough
Lower Chanceford Township
State of Maryland
Cecil County
Harford County

2.2 Exercise Objectives, Capabilities and Activities

The Peach Bottom Atomic Power Station 2012 Medical Services drill was a Functional Exercise (FE) evaluated by the Federal Emergency Management Agency designed to demonstrate the capabilities of State and local emergency management agencies to technically assess the extent of the radiological impact from a contaminated injured individual including transport and receipt at a hospital.

The demonstration includes the ability to:

- A. Demonstrate the ability to respond to a radiation medical emergency following the procedures of Harford County Division of Emergency Operations, Darling Emergency Medical Services (EMS), and Upper Chesapeake Health.
- B. Demonstrate timely and accurate communications between the hospital and offsite response agencies. (Telephones will be used in lieu of radios whenever possible to limit the potential misinterpretation of the drill as an actual event.)
- C. Demonstrate correct priorities and appropriate techniques in EMS, transportation of patients and pre-hospital and hospital emergency care of radioactively contaminated patients.

D. Demonstrate inter-agency cooperation between Darlington EMS and Upper Chesapeake Health.

2.3 Scenario Summary

The exercise scenario for this Medical Services Drill consisted of simulated notifications of escalating emergency classification levels at PBAPS from Site Area Emergency (SAE) to General Emergency (GE). Subsequent to the notification of a General Emergency was an airborne release of radiological material. The 911 Center informed Upper Chesapeake Health, an incident had occurred as part of Traffic and Access Control (TAC) resulting in the injury and potential contamination of an emergency worker. She suffered contusions and abrasions to her left elbow and the forearm sleeves of her shirt are contaminated. Upper Chesapeake Health implemented its radiological emergency plan and prepared a Radiation Emergency Area (REA) to receive and treat the patient.

Upon arrival at Upper Chesapeake Health, the medical treatment team and a radiation safety representative met the Emergency Medical Services (EMS) team at the exterior entrance to the Radiological Emergency Area. The hospital's medical team assessed the patient's condition and surveyed the victim for radiological contamination.

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Drill Evaluation and Results

Contained in this section are the results and findings of the evaluations of all jurisdictions and locations that participated in the April 10, 2012, Medical Services Radiological Emergency Preparedness (REP) Exercise. The exercise was conducted to demonstrate the ability of the Offsite Response Organization to respond to a potentially radiological contaminated injured person associated with the Peach Bottom Atomic Power Station.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of the Exercise Evaluation Area Criteria contained in the REP Exercise Evaluation Methodology. Detailed information on the exercise evaluation area criteria and the Extent-of-Play agreement are found in Appendix B.

The drill was conducted and evaluated in accordance with the Radiological Emergency Preparedness Program Manual and NUREG 0654. The Evaluation Criteria included:

- 1.e.1 Equipment and supplies to support operations
- 3.a.1 Implementation of emergency worker exposure control
- 6.d.1 Transportation and treatment of contaminated injured individuals

The drill successfully demonstrated the response capabilities of the participants (except as may be noted in Section 3.2, Summary Results of Drill Evaluation, and Section 3.3, Criteria Evaluation Summaries).

3.2 Summary Results of Drill Evaluation

The matrix presented in Table 3.1, on the following pages, presents the status of the exercise evaluation area criteria from the REP Exercise Evaluation Methodology that was scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise evaluation area criteria are listed by number and the demonstration status of the criteria is indicated by the use of the following letters:

(D) Deficiency: 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 protective 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.

(A) Area Requiring Corrective Action (ARCA): an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety.

(P) Plan Issue: an observed or identified inadequacy in the ORO's emergency plan or implementing procedures, rather than in the ORO's performance. Plan Issues are not exercise issues and are required to be corrected through the revision of the appropriate plans or procedures during the next annual plan review and update, submitted for FEMA review, and reported in the State Annual Letter of Certification.

(N) Not Demonstrated: term applied to the status of a REP exercise Evaluation Area Criterion indicating that the ORO, for a justifiable reason, did not demonstrate the Evaluation Area Criterion, as required in the extent-of-play agreement or at the two-year or eight-year interval required in the FEMA REP Program Manual.

(M) Met: status of a REP exercise Evaluation Area Criterion indicating that the participating ORO demonstrated all demonstration criteria for the Evaluation Area Criterion to the level required in the extent of-of-play agreement with no Deficiencies or ARCAs assessed in the current exercise and no unresolved prior ARCAs.

Table 3.1 - Summary of Drill Evaluation

DATE: 2012-04-10 SITE: Peach Bottom Atomic Power Station, PA M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		HfdCoUCMC	HfdCo DarEMS
Emergency Operations/Management			
Mobilization	1a1		
Facilities	1b1		
Direction and Control	1c1		
Communications Equipment	1d1		
Equipment and Supplies to Support Operations	1e1	M	M
Protective/Action Decision Making			
Emergency Worker Exposure Control	2a1		
Dose Assessment & PARs & PADs for the Emergency Event	2b1		
Dose Assessment & PARs & PADs for the Emergency Event	2b2		
PADs for disabilities & access/functional needs people	2c1		
Radiological Assessment & Decision-making for Ingestion Pathway	2d1		
Radiological Assessment & Decision-making for Relocation/Reentry/Return	2e1		
Protective Action Implementation			
Implementation of Emergency Worker Exposure Control	3a1	M	M
Implementation of KI PAD for Institutionalized Individuals/Public	3b1		
Implementation of PADs for disabilities & access/functional needs people	3c1		
Implementation of PADs for Schools	3c2		
Implementation of Traffic & Access Control	3d1		
Impediments to Evacuation	3d2		
Availability & use of Commodity & Resource Information	3e1		
Preprinted Materials for Implementing PADs for Commodities & Resources	3e2		
Implementation of Relocation/Reentry/Return Decisions	3f1		
Field Measurement and Analysis			
RESERVED	4a1		
Plume Phase Field Measurement & Analyses	4a2		
Plume Phase Field Measurement & Analyses	4a3		
Post Plume Phase Field Measurements & Sampling	4b1		
Laboratory Operations	4c1		
Emergency Notification and Public Info			
Activation of the Prompt Alert & Notification System	5a1		
RESERVED	5a2		
Activation of the Back-up ANS	5a3		
Activation of the Exception Area ANS	5a4		
Emergency Information & Instructions for the Public/Media	5b1		
Support Operations/Facilities			
Monitoring, Decontamination, & Registration of Evacuees	6a1		
Monitoring/Decontamination of Emergency Workers/Equipment/Vehicles	6b1		
Temporary Care of Evacuees	6c1		
Transportation/Treatment of Contaminated Injured Individuals	6d1	M	

3.3 Criteria Evaluation Summaries

3.3.1 Private Organizations

3.3.1.1 Harford County, Upper Chesapeake Medical Center

In summary, the status of DHS/FEMA criteria for this location is as follows:

- a. MET: 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: 6.d.1.

ISSUE NO.: 46-12-6d1-A-01

CRITERION: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

CONDITION: The emergency room staff demonstrated poor monitoring, decontamination, and communication skills while treating a potentially contaminated injured emergency worker.

POSSIBLE CAUSE: Lack of training.

REFERENCE: NUREG-0654/FEMA-REP-1, F.2; H.10; K.5.a, b; L.1, 4

EFFECT: High risk of cross contamination of injured emergency worker, hospital staff, and the medical facility.

CORRECTIVE ACTION DEMONSTRATED: Retraining the Upper Chesapeake Health emergency medical staff was conducted in two separate 4 hour sessions by the Harford County Radiological Officer, resulting in a successful re-demonstration of effective communication, contamination control, and monitoring technique on July 18, 2012.

- c. DEFICIENCY: None

- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.2 Harford County, Darlington Emergency Medical Services

In summary, the status of DHS/FEMA criteria for this location is as follows:

- a. MET: 1.e.1, 3.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

SECTION 4: CONCLUSION

The State of Maryland and local jurisdictions except where noted in this report demonstrated knowledge of their Radiological Emergency Response Plans (RERP) and procedures adequately implemented during the Peach Bottom Atomic Power Station Medical Services drill.

Two (2) Federal Emergency Management Agency (FEMA) evaluators provided analyses of 5 evaluation criteria. These analyses resulted in a determination of one (1) Areas Requiring Corrective Action (ARCA) which was re-demonstrated and no new Planning Issues were assessed. There were no unresolved issues.

Based on the review of the offsite radiological emergency response plans and procedures submitted, FEMA Region III has determined they are adequate and there is a reasonable assurance they can be implemented, as demonstrated during the Peach Bottom Atomic Power Medical Services drill.

An After Action Implementation Plan (IP) will not be developed as part of this report.

APPENDIX A: DRILL EVALUATORS AND TEAM LEADERS

The following is the list of Evaluators and Team Leader for the Peach Bottom Atomic Power Station 2012 Medical Services Exercise evaluated on April 10, 2012 and re-demonstration conducted July 18, 2012. The following constitutes the managing staff for the Exercise Evaluation:

- Darrell Hammons, DHS/ FEMA, Radiological Assistance Committee (RAC) Chairman
- Michael E. Shuler, Sr., DHS/ FEMA, Program Officer and Site Specialist
- Robert Neff, DHS/ FEMA, Evaluator

DATE: 2012-04-10, SITE: Peach Bottom Atomic Power Station, PA

LOCATION	EVALUATOR	AGENCY
Harford County, Upper Chesapeake Medical Center	Robert Neff	FEMA RIII
Harford County, Darlington Emergency Medical Services	Robert Neff *Michael Shuler	FEMA RIII FEMA RIII
* Team Leader		

APPENDIX B: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAC	After Action Conference
AAR	After Action Report
ALARA	As Low As Reasonably Achievable
ARCA	Area Requiring Corrective Action
CFR	Code of Federal Regulations
DHS	Department of Homeland Security
EMS	Emergency Medical Services
EoP	Extent of Play
EPT	Exercise Planning Team
EPZ	Emergency Planning Zone
FE	Functional Exercise
FEMA	Federal Emergency Management Agency
GE	General Emergency
HSEEP	Homeland Security Exercise Evaluation Program
IP	Improvement Plan
MEMA	Maryland Emergency Management Agency
MS-1	Medical Services Drill
MSEL	Master Scenario Events List
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
PBAPS	Peach Bottom Atomic Power Station
RAC	Regional Assistance Committee
REA	Radiation Emergency Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plans
SAE	Site Area Emergency
TAC	Traffic and Access Control
TCL	Targeted Capabilities List
UTL	Universal Task List

APPENDIX C: EXERCISE PLAN

The enclosed Exercise Plan was created as an overall tool for facilitation and implementation of the Peach Bottom Atomic Power Station 2012 Medical Services drill and to integrate the concepts and policies of the Homeland Security Exercise Evaluation Program with the Radiological Emergency Preparedness Program Exercise Methodology.

The Exercise Plan was originally drafted by the Maryland Emergency Management Agency and published by the Federal Emergency Management Agency as an independent document and is annexed here. The Peach Bottom Atomic Power Station Extent of Play was negotiated and agreed upon by FEMA Region III, and the Maryland Emergency Management Agency (MEMA). The Extent of Play (EoP) is included as an Appendix of the Exercise Plan.

Exercise Plan

NATIONAL EXERCISE PROGRAM

PEACH BOTTOM ATOMIC POWER STATION

FEMA EVALUATED 2012 MEDICAL SERVICES DRILL (MS-1)

UPPER CHESAPEAKE HEALTH

U.S. DEPARTMENT OF HOMELAND SECURITY



FEMA

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PREFACE

The Peach Bottom Atomic Power Station 2012 Evaluated Medical Services Drill (MS-1) is sponsored by Maryland Emergency Management Agency (MEMA) and the Federal Emergency Management Agency (FEMA). This Exercise Plan (ExPlan) was produced with input, advice, and assistance from the Exercise Planning Team (EPT), which followed the guidance set forth in the Federal Emergency Management Agency (FEMA), Homeland Security Exercise and Evaluation Program (HSEEP).

The ExPlan gives officials, observers, media personnel, and players from participating organizations the information necessary to observe or participate in a nuclear power plant accident response exercise focusing on participants' emergency response plans, policies, and procedures as they pertain to this type of event. The information in this document is current as of the date of publication and is subject to change as dictated by the EPT.

The Peach Bottom Atomic Power Station 2012 MS-1 Drill is an *unclassified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the exclusive use of exercise planners, Controllers, and Evaluators, but Players may view other materials deemed necessary to their performance. The ExPlan may be viewed by all exercise participants, *but the Controller and Evaluator (C/E) Handbook is a restricted document intended for Controllers and Evaluators only.*

All exercise participants should use appropriate guidelines to ensure the proper control of information within their areas of expertise and to protect this material in accordance with current jurisdictional directives. Public release of exercise materials to third parties is at the discretion of Department of Homeland Security (DHS) and the EPT.

HANDLING INSTRUCTIONS

1. The title of this document is Peach Bottom Atomic Power Station 2012 MS-1 *Exercise Plan (ExPlan)*.
2. At a minimum, the attached materials will be disseminated only on a need-to-know basis and when unattended, will be stored in an area offering sufficient protection against theft, compromise, inadvertent access, and unauthorized disclosure.
3. For more information, please consult the following points of contact (POCs):

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CHAPTER 1: GENERAL INFORMATION

Introduction

The Peach Bottom Atomic Power Station 2012 Medical Services Drill is a Functional Exercise (FE) designed to establish a learning environment for players to exercise emergency response plans, policies, and procedures as they pertain to Nuclear Power Plant accidents. A Functional Exercise is a complex event that requires detailed planning. To conduct an effective exercise, subject matter experts (SMEs) and local representatives from numerous agencies have taken part in the planning process and will take part in exercise conduct and evaluation.

This Exercise Plan (ExPlan) was produced at the direction of the Federal Emergency Management Agency with the input, advice, and assistance of the State of Maryland. The Peach Bottom Atomic Power Station 2012 Medical Services Drill is evidence of the growing partnership between State and local jurisdictions for response to the threats our Nation and communities face.

Confidentiality

The Peach Bottom Atomic Power Station 2012 Medical Services Drill is an *unclassified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the exclusive use of exercise planners, controllers, and evaluators, but players may view other materials deemed necessary to their performance. This Exercise Plan may be viewed by all exercise participants, *but the Controller and Evaluator (C/E) Handbook is a restricted document intended for controllers and evaluators only.*

All exercise participants should use appropriate guidelines to ensure the proper control of information within their areas of expertise and protect this material in accordance with current Federal, State and Local directives.

Public release of exercise materials to third parties is at the discretion of the Federal Emergency Management Agency (FEMA) and the Exercise Planning Team.

Purpose

The purpose of this exercise is to evaluate player actions against current response plans and capabilities for a nuclear power plant-related incident, and to comply with the requirements of 44 CFR 350 and the guidelines of NUREG 0654. Exercise planners utilized the elements described in the Radiological Emergency Preparedness (REP) Program Manual (April 2012) to develop this exercise.

The objective of The Federal Emergency Management Agency and the Maryland Emergency Management Agency, and local jurisdictions is to demonstrate reasonable assurance that the public can be protected during a nuclear power plant emergency.

Target Capabilities

The establishment of the National Preparedness Priorities have steered the focus of homeland security toward a capabilities-based planning approach. Capabilities-based planning focuses on planning under uncertainty, since the next danger or disaster can never be forecast with complete accuracy. Therefore, capabilities-based planning takes an all-hazards approach to planning and preparation which builds capabilities that can be applied to a wide variety of incidents. States and urban areas use capabilities-based planning to identify a baseline assessment of their homeland security efforts by comparing their current capabilities against the Target Capabilities List (TCL) and the critical tasks of the Universal Task List (UTL). This approach identifies gaps in current capabilities and focuses efforts on identifying and developing priority capabilities and tasks for the jurisdiction. These priority capabilities are articulated in the jurisdiction's homeland security strategy and Multi-Year Training and Exercise Plan (TEP), of which this exercise is a component of.

The capabilities listed below have been selected by the Exercise Planning Team from the priority capabilities identified in State of Maryland Multi-Year TEP and the FEMA Radiological Emergency Preparedness Program Manual (April 2012), Exercise Evaluation Criteria. These capabilities provide the foundation for development of the exercise objectives and scenario, as the purpose of this exercise is to measure and validate performance of these capabilities and their associated critical tasks.

- Planning
- Communications
- Community Preparedness and Participation
- WMD/HazMat Response and Decontamination
- Emergency Triage and Pre-Hospital Treatment
- Medical Supplies Management and Distribution

Exercise Objectives

The Emergency Preparedness Evaluation Areas – the elements and sub elements – for this drill are those that are required to be demonstrated in every MS-1 Drill, per the Radiological Exercise Preparedness (REP) Program Manual (April 2012). Appendix B, Extent of Play shows the emergency preparedness elements that are required to be demonstrated in the Peach Bottom Atomic Power Station 2012 Medical Services Drill, along with the level of demonstration that will be displayed in the exercise (i.e., fully demonstrated limited demonstration, simulated, Out Of Sequence interviews, not demonstrated).

The objective of this exercise is to demonstrate reasonable assurance that the health and safety of the public can be protected, through successful demonstration of tasks identified in Appendix B.

Outstanding Issues

There are no prior deficiencies, no planning issues, and no Area Requiring Corrective Action (ARCAs).

CHAPTER 2: EXERCISE LOGISTICS

Exercise Summary

General

The Peach Bottom Atomic Power Station 2012 Medical Services Drill is designed to establish a learning environment for players to exercise their plans and procedures for responding to a terrorist incident. The Peach Bottom Atomic Power Station 2012 Medical Services Drills was conducted on April 11, 2012. The demonstration was scheduled between 09:00 and 12:00 or until the Lead Controller after consulting with the FEMA Site Specialist, determine the exercise objectives had been met.

Assumptions

Assumptions constitute the implied factual foundation for the exercise and, hence, are assumed to be present before the start of the exercise. The following general assumptions apply to the Peach Bottom Atomic Power Station 2012 Medical Services Drill:

- The exercise will be graded against the REP criteria. Elements outside the scope of the REP criteria will not be graded.
- This exercise will be conducted in a no-fault learning environment wherein systems and processes, not individuals, will be evaluated.
- Exercise simulation will be realistic and plausible, containing sufficient detail from which to respond.
- Exercise players will react to the information and situations as they are presented, in the same manner as if this had been a real event.

Constructs and Constraints

Constructs are exercise devices designed to enhance or improve exercise realism. Alternatively, constraints are exercise limitations that may detract from exercise realism. Constraints may be the inadvertent result of a faulty construct or may pertain to financial and staffing issues. Although there are a number of constructs and constraints (also known as exercise artificialities) for any exercise, the EPT recognizes and accepts the following as necessary:

- Exercise communication and coordination will be limited to the participating exercise venues.
- Communication methods may include telephone, mobile telephone, radio, and other method made available for players to use during the exercise.

- Out-of-Sequence play is allowed.
- Certain simulations are allowed.

The participating agencies may need to balance exercise play with real-world emergencies. It is understood that real-world emergencies will take priority.

Exercise Participants

The following are the categories of participants involved in this exercise; note that the term “participant” refers to all categories listed below, not just those playing in the exercise:

- *Players.* Players are agency personnel who have an active role in responding to the simulated emergency and perform their regular roles and responsibilities during the exercise. Players initiate actions that will respond to and mitigate the simulated emergency.
- *Controllers.* Controllers set up and operate the exercise site; plan and manage exercise play; act in the roles of response individuals and agencies not playing in the exercise. Controllers direct the pace of exercise play and routinely include members from the exercise planning team. They provide key data to players and may prompt or initiate certain player actions to ensure exercise continuity.
- *Evaluators.* Evaluators are chosen to evaluate and provide feedback on a designated functional area of the exercise. They are chosen based on their expertise in the functional area(s) they have been assigned to review during the exercise and their familiarity with local emergency response procedures. Evaluators assess and document participants’ performance against established emergency plans and exercise evaluation criteria, in accordance with HSEEP standards and within the bounds of REP Program guidance and regulations. They are typically chosen from amongst planning committee members or the agencies/organizations that are participating in the exercise. FEMA Evaluators will not serve as Controllers.
- *Actors.* Actors are exercise participants who act or simulate specific roles during exercise play. They are typically volunteers who have been recruited to play the role of victims or other bystanders.
- *Observers.* Observers visit or view selected segments of the exercise. Local Observers do not play in the exercise, and do not perform any control or evaluation functions. Local Observers will view the exercise from a designated observation area and will be asked to remain within the observation area during the exercise. VIPs or other visitors will be handled by each agency or location (Municipal EOC, County EOC, etc.) according to those agencies’ policies and procedures.
- *Media Personnel.* Some media personnel may be present as observers pending approval by the Maryland Emergency Management Agency (MEMA).

- *Support Staff.* Exercise support staff includes individuals who are assigned administrative and logistical support tasks during the exercise (i.e. registration, catering, etc).

Exercise Tools

Controller and Evaluator Handbook

The Peach Bottom Atomic Power Station 2012 Medical Services Drill C/E Handbook is designed to help exercise Controllers and evaluators conduct and evaluate an effective exercise. This Handbook also enables Controllers and Evaluators to understand their roles and responsibilities in exercise execution and evaluation.

Master Scenario Events List

The MSEL outlines benchmarks, as well as injects that drive exercise play. It also details realistic input to the exercise players as well as information expected to emanate from simulated organizations (i.e., those nonparticipating organizations, agencies, and individuals who would usually respond to the situation). An inject will include several items of information, such as inject time, intended recipient, responsible controller, inject type, a short description of the event, and the expected player action.

For the Peach Bottom Atomic Power Station 2012 Medical Services Drill the MSEL will not be used.

Exercise Implementation

Exercise Play

Exercise play will begin at approximately 09:00 with a situation update going to each participating venue. Play will proceed according to the events outlined in the scenario, in accordance with established plans and procedures. The exercise will conclude upon the completion of operations and attainment of the exercise objectives, as determined by the Lead Controller after consultation with Lead FEMA Evaluator.

Exercise Rules

The following are the general rules that govern exercise play:

- Real-world emergency actions take priority over exercise actions.
- Exercise participants will comply with real-world response procedures, unless otherwise directed by control staff.

- All communications (written, radio, telephone, etc.) made during the exercise will begin and end with the phrase, "*This is a drill.*"

Exercise participants placing telephone calls or initiating radio communication must identify the organization, agency, office, and/or individual with whom they wish to speak.

Safety Requirements

General

Exercise participant safety takes priority over exercise events. Although the organizations involved in the Peach Bottom Atomic Power Station 2012 Medical Services Drill come from various response agencies, they share the basic responsibility for ensuring a safe environment for all personnel involved in the exercise. In addition, aspects of an emergency response are dangerous. Professional health and safety ethics should guide all participants to operate in their assigned roles in the safest manner possible. The following general requirements apply to the exercise:

- All exercise controllers, evaluators, and staff will serve as safety observers while the exercise activities are underway. Any safety concerns must be immediately reported to the Lead Controller.
- Participants will be responsible for their own and each other's safety during the exercise. It is the responsibility of all persons associated with the exercise to stop play if, in their opinion, a real safety problem exists. Once the problem is corrected, exercise play can be restarted.
- All organizations will comply with their respective environmental, health, and safety plans and procedures, as well as the appropriate Federal, State, and local environmental health and safety regulations.

Exercise Setup

Exercise setup involves the pre-staging and dispersal of exercise materials; including registration materials, documentation, signage, and other equipment as appropriate.

Accident Reporting and Real Emergencies

- Anyone observing a participant who is seriously ill or injured will first advise the nearest controller to call 911, and state "*This is not a Drill*" prior to explaining the injury or illness then if possible, renders aid, provided the aid does not exceed his or her training.
- The controller who is made aware of a real emergency will initiate the broadcast "*This Is Not A Drill*" on the controller radio network or telephone, providing the following information to the Lead Controller and Exercise Director:

- Venue/function
 - Location within the venue/function
 - Condition
 - Requirements
- If the nature of the emergency requires a suspension of the exercise at the venue/function, all exercise activities at that facility will immediately cease. Exercise play may resume at that venue/function once the "Real-World Emergency" situation has been addressed.
 - Exercise play at other venue/functions should not cease if one venue/function has declared a "Real-World Emergency" unless they are reliant on the affected venue.
 - If a real emergency occurs that affects the entire exercise, the exercise may be suspended or terminated at the discretion of the Exercise Director and Lead Controller.

Site Access

Security

The Lead Controller or Exercise Director will control entry to the exercise venues. To prevent confusion and interruption of the exercise, access to the exercise sites will be limited to exercise participants only. Players should advise their venue's controller or evaluator if an unauthorized person is present. Each organization should follow its internal security procedures, augmented as necessary to comply with exercise requirements.

Observer Coordination

Each organization with observers will coordinate with the Lead Controller or Exercise Director for access to the exercise site. Observers will be escorted to an observation area for orientation and conduct of the exercise. All observers will be asked to remain within the designated observation area during the exercise. Exercise Director and/or the Observer Controller will be present to explain the exercise program and answer questions for the observers during the exercise.

Parking and Directions

Parking information and directions to each venue area are available from the Lead Controller.

Exercise Identification

Players, Controllers and Evaluators will display the agency issued Identification badges while the exercise is in play.

Communications Plan

Exercise Start, Suspension, and Termination Instructions

The exercise is scheduled to run for about 3 hours or until the Lead Controller after consultation with the Lead Evaluator determines that the exercise objectives have been met. The Lead Controller will announce the exercise suspension or termination.

All spoken and written communication will start and end with the statement, "THIS IS AN DRILL/ EXERCISE."

Player Communication

Players will use routine, in-place agency communication systems. Additional communication assets may be made available as the exercise progresses. The need to maintain capability for a real-world response may preclude the use of certain communication channels or systems that would usually be available for an actual emergency incident. In no instance will exercise communication interfere with real-world emergency communications. Each venue will coordinate its own internal communication networks and channels.

The primary means of communication among controllers, and the venues will be telephone.

Player Briefing

Controllers/Evaluators may be required to read specific scenario details to the participants to begin exercise play. They may also have technical handouts or other materials to give to players in order to better orient them to the exercise environment.

External Affairs

Any participation by actual media shall be coordinated through the FEMA Office of External Affairs.

Chapter 3: Player Guidelines

Exercise Staff

Exercise Director

The Exercise Director has the overall responsibility for planning, coordinating, and overseeing all exercise functions. The Exercise Director for the Peach Bottom Atomic Power Station 2012 Medical Services Drill is the Lead Controller who will manage the exercise activities and maintain a close dialogue with the Controllers regarding the status of play and the achievement of the exercise design objectives.

Trusted Agents

Trusted agents are exercise planners and participants who are responsible for developing the Scenario and the Master Scenario Events List (MSEL). These documents are restricted and are not available to other members of the Exercise Planning Team, Players, or other Participants. The trusted agents for the Peach Bottom Atomic Power Station 2012 MS-1 Drill include the Exercise Director, Lead Controller, Exelon Nuclear, Harford County Division of Emergency Operations, and the FEMA Site Specialist.

Lead Controller

The Lead Controller is responsible for the overall organization of the Peach Bottom Atomic Power Station 2012 MS-1 Drill. The Lead Controller monitors exercise progress and coordinates decisions regarding deviations or significant changes to the scenario caused by unexpected developments during play. The Lead Controller monitors actions by individual Controllers and ensures they implement all designated and modified actions at the appropriate time. The Lead Controller debriefs the Controllers after the exercise and oversees the setup and takedown of the exercise.

Controllers

At least one controller will be onsite with every facility participating in the drill. The Lead Facility Controller at each location will coordinate any changes that impact the scenario or affect other areas of play through the Lead Controller. The individual controllers issue exercise materials to players as required and monitor the exercise timeline. Controllers also provide injects to the players as described in the scenario.

Lead Evaluator

The Lead Evaluator is responsible for the overall evaluation of the Peach Bottom Atomic Power Station 2012 MS-1 Drill. The Lead Evaluator monitors exercise progress and stays in contact

with the Lead Controller regarding changes to the exercise during play. The Lead Evaluator monitors actions of individual Evaluators and ensures they are tracking progress of the players in accordance with the Overview of Play. The Lead Evaluator debriefs the evaluators after the exercise and oversees the entire evaluation and After Action process. The Lead Evaluator will be the FEMA Region III Site Specialist for Peach Bottom Atomic Power Station.

Evaluators

Evaluators work under the direction of the Lead Evaluator, and as a team with Controllers. Evaluators are SMEs who record events that take place during the exercise and assess/submit documentation for review and inclusion in the After Action Report (AAR). Evaluators should refrain from any direct interaction with the players during exercise play except with the facilitation of a Controller for clarification of issues or during scheduled interviews.

Player Instructions

Before the Exercise

- Review the appropriate emergency plans, procedures, and exercise support documents.
- Be at the appropriate site at least 30 minutes before the start of the exercise. Wear appropriate uniform/identification badge.
- If you gain knowledge of the scenario before the exercise, notify a controller so that appropriate actions can be taken to ensure a valid evaluation.
- Read your Player Information Handout, which includes information on exercise safety.
- Please sign in.

During the Exercise

- Respond to the exercise events and information as if the emergency were real, unless otherwise directed by an exercise controller.
- Controllers will only give you information they are specifically directed to disseminate. You are expected to obtain other necessary information through existing emergency information channels.
- Do not engage in personal conversations with controllers, evaluators, observers, or media personnel while the exercise is in progress. If you are asked an exercise-related question, give a short, concise answer. If you are busy and cannot immediately respond, indicate so, but report back with an answer at the earliest time possible.
- If you do not understand the scope of the exercise or if you are uncertain about an organization's or agency's participation in an exercise, ask a controller.

- Parts of the scenario may seem implausible. Recognize that the exercise has objectives to satisfy and may require the incorporation of unrealistic aspects. Note that every effort has been made by the trusted agents to balance realism with safety and the creation of an effective learning and evaluation environment.
- All exercise communication will begin and end with the phrase "This is an exercise." This is a precaution taken so anyone overhearing the conversation will not mistake the exercise play for a real-world emergency.
- When communicating with any venue, identify the organization, agency, office, and/or individual with which you want to speak.
- Verbalize out loud when taking an action. This will ensure that evaluators are made aware of critical actions as they occur.
- Maintain a log of your activities. Many times, this log may include documentation of activities missed by a controller or evaluator.

Following the Exercise

- At the end of the exercise at your facility, participate in the debriefing with the controllers and evaluators.
- Complete the Participant Feedback Form as required. This form allows you to comment candidly on emergency response activities and effectiveness of the exercise. Please provide the completed form to a controller or evaluator.
- Provide all rosters, sign in sheets, logs, messages, notes or materials generated from the exercise to your controller or evaluator for review and inclusion in the After Action Report (AAR).

Simulation Guidelines

Because the Peach Bottom Atomic Power Station 2012 MS-1 Drill is of limited duration and scope, the physical description of what would fully occur at the incident sites and surrounding areas will be relayed to the Players by Simulators or Controllers.

If a real emergency occurs during the exercise, the exercise at your respective venue may be suspended or terminated at the discretion of the controller(s) at each venue. If a real emergency occurs, say "Real-World Emergency" and notify the nearest Controller and Evaluator.

CHAPTER 4: EVALUATION AND POST-EXERCISE ACTIVITIES

Exercise Documentation

The goal of the Peach Bottom Atomic Power Station 2012 MS-1 Drill is to comprehensively exercise and evaluate the OROs' plans and capabilities as they pertain to a potential nuclear power plant incident. After the exercise, data collected by Controllers, Evaluators, and Players will be used to identify strengths and areas for improvement in the context of the exercise design objectives.

Debriefing

Immediately following the completion of exercise play, Controllers will facilitate a debriefing with Players from their assigned location. The debriefing is an opportunity for Players to voice their opinions on the exercise and their own performance. At this time, Evaluators can also seek clarification on certain actions and what prompted Players to take them. The debriefing should not last more than 30 minutes. Evaluators should take notes during the debriefing and include these observations in their analysis.

After Action Report

The AAR is the culmination of the exercise. It is a written report outlining the strengths and areas for improvement identified during the exercise. The AAR will include the timeline, executive summary, scenario description, mission outcomes, and capability analysis. The AAR will be drafted by a core group of individuals from the exercise planning team.

After Action Conference and Improvement Plan

The improvement process represents the comprehensive, continuing preparedness effort of which the Peach Bottom Atomic Power Station 2012 MS-1 Drill is a part. The lessons learned and recommendations from the AAR will be incorporated into the Improvement Plan (IP).

After Action Conference

The After Action Conference (AAC), scheduled within 60 days of the drill to allow jurisdiction officials to hear the results of the evaluation analysis, validate the findings and recommendations in the draft AAR, and begin development of the IP.

Improvement Plan

The IP identifies how recommendations will be addressed, including what actions will be taken, who is responsible, and the timeline for completion. It is created by key stakeholders from the

Peach Bottom Atomic Power Station 2012 MS-1 Drill participating agency officials during the AAC scheduled within 60 days of the drill.

APPENDIX A: EXERCISE SCHEDULE

Table A.1

Peach Bottom Atomic Power Station 2012 MS-1 Drill *Schedule*

Time (Tentative)	Personnel	Activity
April 11, 2012		
0900	Darlington EMS Upper Chesapeake Health	Exercise Begins
1030	Darlington EMS	Exercise Ends
1145	Upper Chesapeake Health	Exercise Ends
1200	Drill Participants	Critique and Debriefing

Peach Bottom Atomic Power Station 2012 MS-1 Drill *Schedule*

Time (Tentative)	Personnel	Activity
July 18, 2012 Re-Demonstration		
1100	Upper Chesapeake Health	Exercise Begins
1230	Upper Chesapeake Health	Exercise Ends
1300	Drill Participants	Critique and Debriefing

APPENDIX B: EXTENT OF PLAY INFORMATION

PEACH BOTTOM ATOMIC POWER STATION

UPPER CHESAPEAKE HEALTH MEDICAL SERVICES DRILL

April 11, 2012

July 18, 2012 – Re-demonstration

Method of Operation

1. The power station and its personnel will not play an active role in the facilitation of this drill. The plant's simulated events, radiation releases, and emergency classifications will be injected by off-site controllers. A pre-approved scenario will be used.
2. The Maryland Emergency Management Agency (MEMA) Offices will not be activated as part of this drill. The Exercise Coordinator will provide pre-drill coordination and observe drill activities.
3. Exelon Nuclear will participate as a Controller in this drill.
4. Harford County Division of Emergency Operations will participate in this drill
5. Controllers will be supplied by Exelon Nuclear. Controllers are not players and will provide injects and information to initiate and stimulate drill play by providing radiological readings during the monitoring of personnel. Live radioactive sources will only be used to perform operational checks of radiological monitoring instruments.
6. Observers will not take an active part in the proceedings, but will interact with staff members to the extent necessary to fulfill their observer responsibilities. Coaching of players is not permitted, except as appropriate to provide training to participants awaiting a re-demonstration.
7. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Radiological Emergency Preparedness Program (REPP) Evaluators: FEMA Evaluators will be present at designated demonstration locations.
8. Drill activities are scheduled to commence on or about 09:00, April 11, 2012 and continue until the participants have completed the drill objectives and demonstrated the Exercise Evaluation Criteria.

9. Participants and agencies will Stand Down when the Controllers have confirmed with the evaluators that all evaluation criteria have been demonstrated and when the state and county observers are satisfied that the objectives have been met.
10. An emergency plan is drafted to address the generally expected conditions of an emergency. Not everything in the emergency plan may be applicable for a given scenario. The main purpose of an emergency plan is to assemble sufficient expertise and officials so as to properly react to the events as they occur. The responders should not be so tied to a plan that they cannot take actions that are more protective of the public. Therefore, if, by not following the plan, the responders protect the public equally as well as provided in the plan, it should be noted for possible modification of the plan, but not classified as a negative incident. Furthermore, if, by following the plan there is a failure to protect the public health and safety, it should be noted so that the plan can be modified and the appropriate negative assessment corrected.
11. During the drill any activity that is not satisfactorily demonstrated may be re-demonstrated by the participants during the exercise, provided it does not negatively interfere with the exercise. Refresher training may be provided by the players, observers, and/or controllers. Evaluators are not permitted to provide refresher training. Re-demonstrations will be negotiated between the players, observers, controllers, and evaluators. It is permissible to extend the demonstration window, within reason, to accommodate the re-demonstration. Activities corrected from a re-demonstration will be so noted.

Objectives

- A. Demonstrate the ability to respond to a radiation medical emergency following the procedures of Harford County Division of Emergency Operations, Darlington EMS, and Upper Chesapeake Health.
- B. Demonstrate timely and accurate communications between the hospital and offsite response agencies. (Telephones will be used in lieu of radios whenever possible to limit the potential misinterpretation of the drill as an actual event.)
- C. Demonstrate correct priorities and appropriate techniques in EMS, transportation of patients and pre-hospital and hospital emergency care of radioactively contaminated patients.
- D. Demonstrate inter-agency cooperation between the Darlington EMS and Upper Chesapeake Health.

Extent of Play

Evaluation Area 1—Emergency Operations Management

Sub-Element 1.e—Equipment and Supplies To Support Operations

Intent

This sub-element derives from NUREG-0654, which provides that Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654, H.7,10; J.10.a, b, e, J.11; K.3.a).

Extent of Play

Equipment within the facility (facilities) should be sufficient and consistent with the role assigned to that facility in the ORO's plans and/or procedures in support of emergency operations. Use of maps and displays is encouraged. All instruments should be inspected, inventoried, and operationally checked before each use. Instruments should be calibrated in accordance with the manufacturer's recommendations. Unmodified CDV-700 series instruments and other instruments without a manufacturer's recommendation should be calibrated annually. Modified CDV-700 instruments should be calibrated in accordance with the recommendation of the modification manufacturer. A label indicating such calibration should be on each instrument, or calibrated frequency can be verified by other means. Additionally, instruments being used to measure activity should have a range of readings sticker affixed to the side of the instrument. The above considerations should be included in 4.a.1 for field team equipment; 4.c.1 for radiological laboratory equipment (does not apply to analytical equipment); reception center and emergency worker facilities' equipment under 6.a.1; and ambulance and medical facilities' equipment under 6.d.1.

Sufficient quantities of appropriate direct-reading and permanent record dosimetry and dosimeter chargers should be available for issuance to all categories of emergency workers that could be deployed from that facility. Appropriate direct-reading dosimetry should allow individual(s) to read the administrative reporting limits and maximum exposure limits contained in the ORO's plans and procedures.

Dosimetry should be inspected for electrical leakage at least annually and replaced, if necessary. CDV-138s, due to their documented history of electrical leakage problems, should be inspected for electrical leakage at least quarterly and replaced if necessary. This leakage testing will be verified during the exercise, through documentation submitted in the Annual Letter of Certification, and/or through a staff assistance visit.

Responsible OROs should demonstrate the capability to maintain inventories of KI sufficient for use by emergency workers, as indicated on rosters; institutionalized individuals, as indicated in capacity lists for facilities; and, where stipulated by the plan and/or procedures, members of the general public (including transients) within the plume pathway EPZ.

Quantities of dosimetry and KI available and storage location(s) will be confirmed by physical inspection at storage location(s) or through documentation of current inventory submitted during the exercise, provided in the Annual Letter of Certification submission, and/or verified during a Staff Assistance Visit. Available supplies of KI should be within the expiration date indicated on KI bottles or blister packs. As an alternative, the ORO may produce a letter from a certified private or State laboratory indicating that the KI supply remains potent, in accordance with U.S. Pharmacopoeia standards.

At locations where traffic and access control personnel are deployed, appropriate equipment (for example, vehicles, barriers, traffic cones and signs, etc.) should be available or their availability described.

All activities must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.

Negotiated Extent of Play:

Ambulance crews operating are considered emergency workers and are required to implement protective measures consistent with protection against blood-borne pathogens; i.e., long sleeved garments, trousers, impermeable gloves, and surgical masks. Dosimetry issue consists of one permanent reading dosimeter per worker and direct reading dosimeters.

Hospital personnel are also considered emergency workers. Direct Reading Dosimeters may be issued individually; however, an Area Kit will be established in the Radiation Emergency Area (REA). Individual PRDs will be issued by the hospital. Radiological Survey Instruments are calibrated per manufactures recommendations.

Outstanding Issues:

None

Evaluation Area 3—Protective Action Implementation

Sub-Element 3.a—Implementation of Emergency Worker Exposure Control

Intent

This sub-element derives from NUREG-0654, which provides that OROs should have the capability to provide for the following: distribution, use, collection, and processing of direct-reading dosimetry and permanent record dosimetry; the reading of direct-reading dosimetry by emergency workers at appropriate frequencies; maintaining a radiation dose record for each emergency worker; and establishing a decision chain or authorization procedure for emergency workers to incur radiation exposures in excess of protective action guides, always applying the ALARA (As Low As is Reasonably Achievable) principle as appropriate.

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart. (NUREG-0654, K.3.a, b).

Extent of Play

ORO's should demonstrate the capability to provide appropriate direct-reading and permanent record dosimetry, dosimeter chargers, and instructions on the use of dosimetry to emergency workers. For evaluation purposes, appropriate direct-reading dosimetry is defined as dosimetry that allows individual(s) to read the administrative reporting limits (that are pre-established at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent) and maximum exposure limits (for those emergency workers involved in life saving activities) contained in the ORO's plans and procedures.

Each emergency worker should have the basic knowledge of radiation exposure limits as specified in the ORO's plan and/or procedures. Procedures to monitor and record dosimeter readings and to manage radiological exposure control should be demonstrated.

During a plume phase exercise, emergency workers should demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached. The emergency

worker should report accumulated exposures during the exercise as indicated in the plans and procedures. OROs should demonstrate the actions described in the plan and/or procedures by determining whether to replace the worker, to authorize the worker to incur additional exposures or to take other actions. If scenario events do not require emergency workers to seek authorizations for additional exposure, evaluators should interview at least two emergency workers, to determine their knowledge of whom to contact in the event authorization is needed and at what exposure levels. Emergency workers may use any available resources (for example, written procedures and/or co-workers) in providing responses.

Although it is desirable for all emergency workers to each have a direct-reading dosimeter, there may be situations where team members will be in close proximity to each other during the entire mission and adequate control of exposure can be effected for all members of the team by one dosimeter worn by the team leader. Emergency workers who are assigned to low exposure rate areas, for example, at reception centers, counting laboratories, emergency operations centers, and communications centers, may have individual direct-reading dosimeters or they may be monitored by dosimeters strategically placed in the work area. It should be noted that, even in these situations, each team member must still have their own permanent record dosimetry. Individuals without specific radiological response missions, such as farmers for animal care, essential utility service personnel, or other members of the public who must re-enter an evacuated area following or during the plume passage, should be limited to the lowest radiological exposure commensurate with completing their missions.

All activities must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.

Negotiated Extent of Play:

- *Demonstrate appropriate procedures and equipment to manage radiological exposure to staff.*
- *Demonstrate the ability to transport contaminated/injured individuals while using ALARA principles.*
- *Demonstrate the ability to utilize dosimetry, equipment and procedures to manage radiological exposure to emergency workers as required by plans.*

Radiological briefings will be provided to address exposure limits and procedures to replace personnel approaching limits and how permission to exceed limits is obtained. At any time, players may ask other players or supervisors to clarify radiological information. Standard issue of dosimetry and potassium iodide for emergency workers is as follows:

1 PRD, 1 DRD, and 1 unit of KI

All locations that have dosimetry equipment indicated within their Radiological Emergency Response Plan (RERP) will make the dosimetry equipment (and KI, as appropriate) available for inspection by the Federal Evaluator. Simulation PRDs with mock serial numbers may be used.

Outstanding Issues:

None

Evaluation Area 6—Support Operation/ Facilities

Sub-Element 6.d—Transportation and Treatment of Contaminated Injured Individuals

Intent

This sub-element derives from NUREG-0654, which provides that Offsite Response Organizations (ORO) should have the capability to transport contaminated injured individuals to medical facilities with the capability to provide medical services.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals. (NUREG-0654, F.2; H.10; K.5.a, b; L.1, 4).

Extent of Play

Monitoring, decontamination, and contamination control efforts will not delay urgent medical care for the victim.

Offsite Response Organizations (ORO) should demonstrate the capability to transport contaminated injured individuals to medical facilities. An ambulance should be used for the response to the victim. However, to avoid taking an ambulance out of service for an extended time, any vehicle (for example, car, truck, or van) may be used to transport the victim to the medical facility. Normal communications between the ambulance/dispatcher and the receiving medical facility should be demonstrated. If a substitute vehicle is used for transport to the medical facility, this communication must occur before releasing the ambulance from the drill. This communication would include reporting radiation monitoring results, if available. Additionally, the ambulance crew should demonstrate, by interview, knowledge of where the ambulance and crew would be monitored and decontaminated, if required, or whom to contact for such information.

Monitoring of the victim may be performed before transport, done en route, or deferred to the medical facility. Before using a monitoring instrument(s), the monitor(s) should demonstrate the process of checking the instrument(s) for proper operation. All monitoring activities should be completed as they would be in an actual emergency. Appropriate contamination control measures should be demonstrated before and during transport and at the receiving medical facility.

The medical facility should demonstrate the capability to activate and set up a radiological emergency area for treatment. Equipment and supplies should be available for the treatment of contaminated injured individuals.

The medical facility should demonstrate the capability to make decisions on the need for decontamination of the individual, to follow appropriate decontamination procedures, and to maintain records of all survey measurements and samples taken. All procedures for the collection and analysis of samples and the decontamination of the individual should be demonstrated or described to the evaluator.

All activities associated with this criterion must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.

Negotiated Extent of Play:

Demonstrate that the facility has the appropriate space, adequate resources and trained personnel to provide monitoring, decontamination and medical services to contaminated/injured individuals.

Demonstrate the ability to transport contaminated/injured individuals while using ALARA principles.

The designated EMS squad will simulate picking up a pre-staged contaminated/injured victim.

Outstanding Issues:

None

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