



**FEMA**

November 22, 2019

Mr. David R. Padfield  
Director  
Pennsylvania Emergency Management Agency  
1310 Elmerton Avenue  
Harrisburg, PA 17110

Dear Mr. Padfield:

The purpose of this letter is to officially inform you of the Federal Emergency Management Agency's (FEMA) identification of a Level 1 Finding that occurred during the Limerick Generating Station (LGS) Radiological Emergency Preparedness (REP) Exercise conducted on November 19, 2019. A Level 1 Finding is being assessed against the Skippack Township Emergency Management Agency due to sub-par performance under the following demonstration criterion:

**3.a.1 Implementation of Emergency Worker Exposure Control**

*The Oil and Hazardous Material representative in the EOC did not perform all required functions for exposure control. There was no area dosimetry kit assembled and placed in the EOC to track radiation dose. The EOC staff was not provided the required Category B dosimetry kits and no dose tracking forms were completed. The radiological briefing was conducted only after urging through the controller and county EOC.*

**1.c.1 Direction and Control**

*The Emergency Management Coordinator failed to provide adequate direction and control in order to accomplish all required tasks within the Skippack Township EOC.*

**3.c.1 Implementation of Precautionary and/or Protective Actions for Persons with Disabilities and Access/Functional Needs**

*The Public Health and EMS, Transportation and Oil and Hazardous Material representatives in the EOC did not perform all required functions to provide notification or meet transportation needs for persons with disabilities and access/functional needs. Transportation needs were discussed for the persons identified and means of transporting those persons were mentioned. However, no calls or simulated calls were made to providers as required. The Public Health and EMS officer was to review the township's list for individuals with hearing impairments and to coordinate with the Oil and Hazardous Materials representative on actual notification of the emergency to the hearing impaired. During the exercise, the EMC advised the RO and Firefighting Officer that door-to-door notification would need accomplished for the hearing impaired. Staff acknowledged that it could be done, but the actual coordination between the Oil and Hazardous Material staff and Public Health and EMS Officer was not demonstrated. When the township received notification that sirens were to*

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*be sounded, no preparations or activation of personnel was made or simulated to notify the hearing impaired.*

**1.a.1 Mobilization**

*There was no 24-hour roster available to review.*

**3.d.1 Implementation of Traffic and Access Control**

*Staffing of the Traffic Control Points (TCPs) under the authority of Skippack Township was not clear. Activation of the TCPs was not conducted during the exercise. The Emergency Management Coordinator stated that the Township does not have a Police Department and that staffing of the TCPs in Skippack Township would be performed by Pennsylvania State Police (PSP). The Township Plan states that one of the four TCPs would be staffed by PSP and the remaining three by "Fire Police". The Skippack EOC made no effort to coordinate or communicate with any other agency to make sure the TCPs would be staffed.*

In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with the pertinent organizations participating in the off-site exercise evaluation. The FEMA REP Program Manual, defines a Level 1 Finding 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 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."

Because of the potential impact of a Level 1 Finding on the protection of the public health and safety, it must be corrected within 120 days from the date of the exercise through appropriate remedial actions including remedial exercises, drills, or other actions. In accordance with the FEMA REP Program Manual, if the remedial exercise can be successfully completed within 75 days of the biennial exercise, FEMA includes the results and findings of the remedial exercise in the final AAR for the biennial exercise.

Please coordinate with this office the date and time of the remedial exercise within 10 days from receipt of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Thomas Scardino at (215) 931-5546.

Sincerely,



MaryAnn Tierney  
Regional Administrator