



After Action Report

Millstone Power Station Biennial Exercise

FEMA Region 1 Radiological Emergency Preparedness Program

Report Date: January 24, 2023



FEMA

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Executive Summary

On November 1, 2022, the Federal Emergency Management Agency (FEMA) Region I evaluated an exercise in the plume exposure pathway emergency planning zone (EPZ) around the Millstone Power Station. The purpose of the exercise was to demonstrate and assess the level of state and local preparedness in responding to a radiological emergency. This exercise was held in accordance with FEMA's policies and guidance concerning the exercise of state and local radiological emergency response plans and procedures.

Prior exercises at this site were most recently conducted on June 8-9, 2021 (plume and ingestion exposure pathway EPZs), March 20, 2018 (plume exposure pathway), as well as August 16, 2016 (plume exposure pathway) and September 9, 2014 (plume exposure pathway with a hostile action-based scenario). The qualifying emergency preparedness exercise was conducted in 1982.

FEMA wishes to acknowledge the efforts of the many individuals who participated in this exercise. The various agencies, organizations, and units of government from the state and local jurisdictions within the States of Connecticut and New York who participated in this exercise are listed elsewhere in this report.

Protecting the public's health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. The state and local organizations successfully demonstrated knowledge of their emergency response plans and procedures.

There were no Level 1 or Level 2 Findings, nor planning issues as a result of the November 1, 2022, evaluated exercise. There were no prior open Findings or planning issues.

Section 1: Exercise Overview

Exercise Name	Millstone Power Station
Exercise Dates	November 1, 2022
Type of Exercise	Plume
Program	Department of Homeland Security/FEMA Radiological Emergency Preparedness Program
Scenario	Radiological Emergency

1.2 Exercise Planning Team Leadership

STATE OF CONNECTICUT DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION, DIVISION OF EMERGENCY MANAGEMENT AND HOMELAND SECURITY

Stephen Henrick – Emergency Management Program Supervisor

Leonard Nelson – Emergency Management Program Specialist

Gemma Fabris – Emergency Management Program Specialist

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION

Jeffrey Semancik – Director, Radiation Division

Gary McCahill – Radiation Control Specialist

Michael Firsick – Radiation Control Specialist

STATE OF RHODE ISLAND EMERGENCY MANAGEMENT AGENCY

Bryan Greenwood – Radiological Coordinator

NEW YORK STATE DIVISION OF HOMELAND SECURITY AND EMERGENCY SERVICES

Gary Machina – Radiological Emergency Preparedness Program Chief

DOMINION ENERGY NUCLEAR CONNECTICUT MILLSTONE POWER STATION

Thomas Rigney – Nuclear Emergency Preparedness Supervisor

Morris Sanders – Nuclear Emergency Preparedness Specialist IV

Daniel Casey – Nuclear Emergency Preparedness Specialist IV

DEPARTMENT OF HOMELAND SECURITY FEDERAL EMERGENCY MANAGEMENT AGENCY, REGION I

Ingrid Pierce – Regional Assistance Committee Chairperson

Helen LaForge – Technological Hazards Program Specialist

Taneeka Hollins – Technological Hazards Program Senior Specialist

1.3 Participating Organizations

Agencies and organizations from the following jurisdictions participated in the Millstone Power Station exercise:

- State Jurisdictions
 - State of Connecticut
 - Connecticut Department of Agriculture
 - Connecticut Department of Consumer Protection
 - Connecticut Department of Corrections
 - Connecticut Department of Developmental Services
 - Connecticut Department of Emergency Services and Public Protection
 - Connecticut Department of Energy and Environmental Protection (DEEP)
 - Connecticut Department of Public Health
 - Connecticut Department of Transportation
 - Connecticut Division of Emergency Management and Homeland Security (DEMHS)
 - Connecticut Governor's Office
 - Connecticut National Guard
 - Connecticut Office of Early Childhood
 - State of Rhode Island
 - Rhode Island Emergency Management Agency
 - State of New York
 - New York State Division of Homeland Security and Emergency Services
- Risk Jurisdictions
 - City of Groton
 - Groton Mayor's Office
 - Groton Police Department
 - Groton Fire Department
 - Groton Emergency Management
 - Groton Finance
 - Groton Public Works

- Groton Business Administration
- Groton Information Technology
- Groton Parks and Recreation
- Groton Utilities
- City of New London
 - New London Department of Public Works
 - New London Department Social Services Department
 - New London Emergency Management
 - New London Fire Department
 - New London Information Technology Department
 - New London Office of the Mayor
 - New London Police Department
 - New London School Superintendent's Office
- Fishers Island
 - Fishers Island Emergency Management Office
 - Fishers Island Emergency Medical Services
 - Fishers Island School District
 - Fishers Island Ferry District
 - Fishers Island Fire Department
 - Fishers Island Telephone Corporation
 - Suffolk County Emergency Management Office
 - Town of Southold
- Town of Ledyard
 - Ledyard Department of Public Works
 - Ledyard Fire-EMS-Police Dispatch
 - Ledyard Fire-Rescue
 - Ledyard Public Works
 - Ledyard Police
 - Ledyard Town Council
- Town of Montville
 - Montville Fire Marshal's Office
 - Montville Fire Company
 - Montville Office of the Mayor
 - Montville Police Department
- Town of Old Lyme
 - Old Lyme Board of Selectman
 - Old Lyme Emergency Management
 - Old Lyme Fire Marshal's Office
 - Old Lyme Social Services
 - Old Lyme Volunteer Fire Department
 - Regional School District 18
- Town of East Lyme

- Niantic Fire Department
 - Flanders Fire Department
 - East Lyme Board of Selectmen
 - East Lyme Communications and Warning Center
 - East Lyme Emergency Management
 - East Lyme Public Schools
 - East Lyme Public Works
 - East Lyme Police Department
- Town of Groton
 - Groton Public Schools
 - Mystic Fire Department
 - Town of Groton Emergency Management
 - Town of Groton Town Manager
 - Town of Groton Police
 - Town of Groton Public Works
- Town of Lyme
 - Lyme Board of Selectmen
 - Lyme Emergency Management
 - Lyme Public Safety
 - Lyme Public Works
 - Lyme Social Services
 - Lyme Fire Company
 - Lyme Schools
- Town of Waterford
 - Waterford Ambulance Services
 - Waterford Board of Selectmen
 - Waterford Department of Public Safety
 - Waterford Fire Department
 - Waterford Police Department
 - Waterford Public Schools
 - Waterford Recreation and Parks
 - Waterford Social Services
- Support Jurisdiction (CT)
 - Town of Stonington
 - Emergency Management
- Private/Volunteer Organizations
 - Dominion Energy Nuclear Connecticut, Inc. Millstone Power Station
 - Electric Boat (EB) Security
 - General Dynamics Electric Boat
 - Amateur Radio Emergency Service (ARES)
 - Pfizer
 - United Way of Connecticut; 2-11 Connecticut

- Middlesex Hospital
- Federal Jurisdictions
 - Federal Emergency Management Agency (FEMA)
 - U.S. Coast Guard
 - U.S. Nuclear Regulatory Commission (NRC)

Section 2: Exercise Design Summary

2.1 Exercise Purpose and Design

The FEMA Region I office evaluated the exercise on November 1, 2022, to assess the capabilities of local emergency preparedness organizations in implementing their Radiological Emergency Response Plans (RERPs) and procedures to protect the public health and safety during a radiological emergency involving the Millstone Power Station (MPS). The purpose of this report is to present the results and findings on the performance of the offsite response organizations (OROs) during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and identified Capabilities/REP Criteria selected to be exercised are discussed in the Extent-of-Play Agreement, contained within Appendix B.

2.3 Scenario Summary

The exercise scenario was developed to evaluate the response of the exercise participants to a radiological emergency.

Section 3: Analysis of Capabilities

3.1 Exercise Evaluation and Results

This section contains the results and findings of the evaluation of all jurisdictions and functional entities that participated in the November 1, 2022, plume exercise, conducted to test the offsite emergency response capabilities of state and local governments in the 10-mile Emergency Planning Zone surrounding the Millstone Power Station.

Each jurisdiction and functional entity were evaluated on its demonstration of criteria contained in the exercise evaluation areas as outlined in the REP Program Manual. Detailed information on the exercise evaluation area criteria and the extent-of-play agreement for the exercise are included within Appendix B of this report.

3.2 Summary Results of Exercise Evaluation

Table 1 below includes the assessment activity objectives, demonstration criteria, and status of each demonstration criterion evaluated during the Millstone Exercise.

Each jurisdiction and functional entity was evaluated based on the demonstration of core capabilities and demonstration criteria. Demonstration criteria are listed and the demonstration status of those criteria are indicated by the use of the following terms:

- **Met (M):** The jurisdiction or functional entity performed all activities under the objective/capability target to the level required per the work plan and/or the extent-of-play agreement, with no Level 1 or Level 2 Findings evaluated under that objective/capability target during the current activity and no unresolved prior Level 2 Finding(s).
- **Level 1 Finding (L1):** An observed or identified inadequacy of organizational performance during an assessment activity that could cause a determination 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 NPP.
- **Level 2 Finding (L2):** An observed or identified inadequacy of organizational performance during an assessment activity that is not considered, by itself, to adversely impact public health and safety.
- **Plan Issue (P):** An observed or identified inadequacy in the ORO's emergency plan/implementing procedures, rather than in that of the ORO's performance.
- **Not Demonstrated (N):** For a justifiable reason, the jurisdiction or functional entity did not perform assessment activities under the objective/capability target as specified in the extent-of-play agreement.
- **Not Applicable (N/A):** The objective/capability target does not apply to the jurisdiction.

Table 1. Summary Results of Exercise Evaluation

DATE: 2022-11-01 SITE: Millstone Power Station, CT M: Met, L1: Level 1 Finding, L2: Level 2 Finding, P: Plan Issue, N: Not Demonstrated		CT SEOC	CT DEEP	CT JIC	CT FMT-A	CT FMT-B	CT 211	CT Region IV	Millstone EOF	City of Groton EOC	City of New London EOC
Emergency Operations Management											
Mobilization	1a1	M	M	M	M	M		M	M	M	M
Facilities	1b1										
Direction and Control	1c1	M	M	M				M	M	M	M
Communications Equipment	1d1	M	M	M	M	M	M	M	M	M	M
Equipment and Supplies to Support Operations	1e1	M	M		M	M	M	M	M	M	M
Protective Action Decision Making											
Emergency Worker Exposure Control	2a1	M	M								
Dose Assessment & PARs & PADs for the Emergency Event	2b1	M	M						M		
Dose Assessment & PARs & PADs for the Emergency Event	2b2	M	M								
PADs for the Protection of persons with disabilities and access/functional needs	2c1	M	M								
Radiological Assessment and Decision-making for the Ingestion Exposure Pathway	2d1										
Radiological Assessment & Decision-making Concerning Post-Plume Phase Relocation, Reentry, and Return	2e1										
Protective Action Implementation											
Implementation of Emergency Worker Exposure Control	3a1		M		M	M				M	M
Implementation of KI Decision for Institutionalized Individuals and the Public	3b1										
Implementation of Protective Actions for persons with disabilities and access/functional needs	3c1	M						M		M	M
Implementation of Protective Actions for persons with disabilities and access/functional needs	3c2	M						M		M	M
Implementation of Traffic and Access Control	3d1	M								M	M
Implementation of Traffic and Access Control	3d2	M								M	M
Implementation of Ingestion Pathway Decisions	3e1										
Implementation of Ingestion Pathway Decisions	3e2										

DATE: 2022-11-01 SITE: Millstone Power Station, CT M: Met, L1: Level 1 Finding, L2: Level 2 Finding, P: Plan Issue, N: Not Demonstrated		CT SEOC	CT DEEP	CT JIC	CT FMT-A	CT FMT-B	CT 211	CT Region IV	Millstone EOF	City of Groton EOC	City of New London EOC
Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions	3f1										
Field Measurement and Analysis											
RESERVED	4a1										
Plume Phase Field Measurement and Analyses	4a2		M								
Plume Phase Field Measurement and Analyses	4a3				M	M					
Post Plume Phase Field Measurements and Sampling	4b1										
Laboratory Operations	4c1										
Emergency Notification and Public Info											
Activation of the Prompt Alert and Notification System	5a1			M				M	M	M	M
RESERVED	5a2										
Activation of the Prompt Alert and Notification System	5a3										
Activation of the Prompt Alert and Notification System	5a4										
Emergency Information and Instructions for the Public and the Media	5b1			M			M			M	M
Support Operations/Facilities											
Monitoring, Decontamination, and Registration of Evacuees	6a1										
Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles	6b1										
Temporary Care of Evacuees	6c1										
Transportation and Treatment of Contaminated Injured Individuals	6d1										

DATE: 2022-11-01 SITE: Millstone Power Station, CT M: Met, L1: Level 1 Finding, L2: Level 2 Finding, P: Plan Issue, N: Not Demonstrated		Fishers Island EOC	Ledyard EOC	Lyme EOC	Montville EOC	Old Lyme EOC	Stonington EOC	Town of East Lyme EOC	Town of Groton EOC	Town of Waterford EOC
Mobilization	1a1	M	M	M	M	M		M	M	M
Facilities	1b1									
Direction and Control	1c1	M	M	M	M	M		M	M	M
Communications Equipment	1d1	M	M	M	M	M	M	M	M	M
Equipment and Supplies to Support Operations	1e1	M	M	M	M	M		M	M	M
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 the Protection of persons with disabilities and access/functional needs	2c1									
Radiological Assessment and Decision- making for the Ingestion Exposure Pathway	2d1									
Radiological Assessment & Decision-making Concerning Post-Plume Phase Relocation, Reentry, and Return	2e1									
Implementation of Emergency Worker Exposure Control	3a1	M	M	M	M	M		M	M	M
Implementation of KI Decision for Institutionalized Individuals and the Public	3b1									
Implementation of Protective Actions for persons with disabilities and access/functional needs	3c1	M	M	M	M	M		M	M	M
Implementation of Protective Actions for persons with disabilities and access/functional needs	3c2	M	M	M	M	M		M	M	M
Implementation of Traffic and Access Control	3d1	M	M	M	M	M		M	M	M
Implementation of Traffic and Access Control	3d2	M	M	M	M	M		M	M	M
Implementation of Ingestion Pathway Decisions	3e1									
Implementation of Ingestion Pathway Decisions	3e2									
Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions	3f1									
RESERVED	4a1									
Plume Phase Field Measurement and Analyses	4a2									

DATE: 2022-11-01 SITE: Millstone Power Station, CT M: Met, L1: Level 1 Finding, L2: Level 2 Finding, P: Plan Issue, N: Not Demonstrated		Fishers Island EOC	Ledyard EOC	Lyme EOC	Montville EOC	Old Lyme EOC	Stonington EOC	Town of East Lyme EOC	Town of Groton EOC	Town of Waterford EOC
Plume Phase Field Measurement and Analyses	4a3									
Post Plume Phase Field Measurements and Sampling	4b1									
Laboratory Operations	4c1									
Activation of the Prompt Alert and Notification System	5a1	M	M	M	M	M		M	M	M
RESERVED	5a2									
Activation of the Prompt Alert and Notification System	5a3		M	M				M		
Activation of the Prompt Alert and Notification System	5a4									
Emergency Information and Instructions for the Public and the Media	5b1	M	M	M	M	M		M	M	M
Monitoring, Decontamination, and Registration of Evacuees	6a1									
Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles	6b1									
Temporary Care of Evacuees	6c1									
Transportation and Treatment of Contaminated Injured Individuals	6d1									

3.3 Criteria Evaluation Summaries

3.3.1 STATE OF CONNECTICUT JURISDICTION

3.3.1.1 CT State Emergency Operations Center

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.2, 2.c.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.2 CT Department of Energy and Environmental Protection

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.a.1, 4.a.2.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.3 CT Joint Information Center

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.4 CT Field Monitoring Team-A

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

- a) MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.5 CT Field Monitoring Team-B

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

- a) MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.6 CT 211

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

- a) MET: 1.d.1, 1.e.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.7 CT DEMHS Region 4

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.c.1, 3.c.2, 5.a.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.1.8 Millstone Emergency Operations Facility

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2 RISK JURISDICTIONS

3.3.2.1 City of Groton Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: One
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None

- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.2 City of New London Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.3 Fishers Island NY Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.4 Ledyard Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1, 5a.3.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.5 Lyme Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1, 5.a.3.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.6 Montville Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.7 Old Lyme Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.8 Town of East Lyme Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1, 5.a.3.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.9 Town of Groton Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.2.10 Town of Waterford Local EOC

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

- a) MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.3 SUPPORT JURISDICTIONS

3.3.3.1 Stonington Local EOC

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

- a) MET: 1.d.1
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.4 OUT OF SEQUENCE EVENTS – SCHOOLS, DAYCARES, LONG TERM CARE FACILITIES

The following demonstrations were conducted out of sequence from August thru November 2022.

3.3.4.1: Schools

The schools below were evaluated on criterion 3.c.2 out of sequence:

- Flanders School, East Lyme, CT - September 16, 2022

- East Lyme High School, East Lyme, CT – September 21, 2022
- East Lyme Middle School, East Lyme, CT – September 22, 2022
- Lyme-Old Lyme Region 18 District Schools, Old Lyme, CT September 29, 2022
- Niantic Center School (East Lyme School District), Niantic, CT – October 12, 2022
- Lillie B. Haynes Elementary School, Niantic, CT – October 17, 2022
- Lyme Academy of Fine Arts, Old Lyme, CT – October 19, 2022

In summary, the status of DHS/FEMA criteria for these locations is as follows:

- a) MET: 3.c.2
- b) LEVEL 1 FINDING: None
- c) LEVEL 2 FINDING: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.4.2: Licensed Daycares

The daycare facilities below were evaluated on criterion 3.c.1 out of sequence:

- Little Learners, Thames Valley Council for Community Action, Inc, Groton, CT - August 8, 2022
- Groton/Mystic Early Childcare Development Center - August 9, 2022
- Cherished Children, Groton, CT - August 16, 2022
- Babbling Bambinos, Ledyard, CT – August 17, 2022
- United Methodist Childcare Center, Ledyard, CT - August 17, 2022
- Precious Memories Place, Groton, CT - August 23, 2022
- Little Acorns Preschool, Groton, CT – August 24, 2022
- First Steps Daycare Center, Montville, CT - August 25, 2022
- Groton/Mystic Early Childcare Development Center, Groton, CT - September 2, 2022
- Children’s Nook, Groton, CT – September 12, 2022
- Teddy Bear Hollow Daycare, Montville, CT – September 12, 2022
- Riverfront Children’s Center, Groton, CT – September 19, 2022
- Saint Luke Grins and Giggles Pre-school, Ledyard, CT – September 19, 2022
- Precious Memories Preschool – Sandy Hollow (Mystic) Groton, CT – September 20, 2022
- Toll Gate Christian Nursery/Preschool, Groton, CT – September 22, 2022
- Noank Baptist Church Day Nursery School, Noank, CT – September 26, 2022

- Stepping Stones Discovery and Development Center, Groton, CT – September 29, 2022
- Saint Andrews Presbyterian Church Preschool, Groton, CT – November 15, 2022
- St. Marks Toddler Playgroup, Mystic, CT – November 15, 2022

In summary, the status of DHS/FEMA criteria for these locations is as follows:

- a) MET: 3.c.1
- b) LEVEL 1 FINDING: None
- c) LEVEL 2 FINDING: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.4.3 Long Term Care Facilities

The long term care facilities below were evaluated on criterion 3.c.1 out of sequence:

- Harbor Village North Health and Rehabilitation, New London, CT - August 10, 2022
- Beechwood, New London, CT - August 12, 2022
- Briarcliff Manor, New London, CT - August 23, 2022
- Sunny Lodge Guest Home, New London, CT - August 24, 2022
- Bacon and Hinkley Home Inc, New London, CT – September 7, 2022

In summary, the status of DHS/FEMA criteria for these locations is as follows:

- a) MET: 3.c.1.
- b) LEVEL 1 FINDING: None
- c) LEVEL 2 FINDING: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5 OUT OF SEQUENCE EVENTS - FACILITIES

The following demonstrations were conducted out of sequence in September 2022

3.3.5.1 CT State Emergency Operations Center

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

- h) MET: 1.b.1.
- i) LEVEL 1 FINDINGS: None

- j) LEVEL 2 FINDINGS: None
- k) PLAN ISSUES: None
- l) NOT DEMONSTRATED: None
- m) PRIOR ISSUES - RESOLVED: None
- n) PRIOR ISSUES - UNRESOLVED: None

3.3.5.2 CT DEMHS Region 4

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.3 Millstone Emergency Operations Facility

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.4 City of Groton Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.5 City of New London Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None

- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.6 Fishers Island NY Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.7 Ledyard Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.8 Lyme Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.9 Montville Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.10 Old Lyme Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.11 Town of East Lyme Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.12 Town of Groton Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.13 Town of Waterford Local EOC

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

- a) MET: 1.b.1.
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.14 Connecticut State Police

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

- a) MET: 3.a.1
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.15 Connecticut Department of Transportation - Norwich

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

- a) MET: 3.a.1
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

3.3.5.16 Middlesex Hospital Medical Services Drill

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

- a) MET: 6.d.1
- b) LEVEL 1 FINDINGS: None
- c) LEVEL 2 FINDINGS: None
- d) PLAN ISSUES: None
- e) NOT DEMONSTRATED: None
- f) PRIOR ISSUES - RESOLVED: None
- g) PRIOR ISSUES - UNRESOLVED: None

Section 4: Conclusion

The State and local organizations identified in this report all demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Level 1 or Level 2 Findings, nor planning issues as a result of the November 1, 2022, evaluated exercise.

Appendix A: Exercise Timeline

Date: November 1, 2022

Site: Millstone

Emergency Classification Level or Event	Time Utility Declared	2022 Millstone Biennial Exercise Timeline					
		Time that Notification Was Received at the Listed Location					
		CT SEOC	CT JIC	CT 211	CT Region 4	City of New London	Fishers Island
Unusual Event	0751	0757	0758	N/A	0757	0751	0757
Alert	0813	0821	0821	0850	0821	0813	0813
SAE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE	1000	1008	1010	1026	1008	1007	1009
Start of Simulated Radiation Release	1000	1008	1010	1026	1008	1007	1009
Termination of Simulated Radiation Release	1149	N/A	N/A	N/A	N/A	N/A	N/A
Facility Declared Operational		0905	0845	24 Hour	0837	0815	0813
Governor's Declaration of State of Emergency		1017	1021	1034	1017	1033	1034
Declaration of Local Emergency		N/A	N/A	N/A	N/A	N/A	N/A
Exercise Terminated		1153	1153	1155	1152	1155	1150
First Precautionary/Protective Actions: Describe: School and Day Care Dismissal Close Parks Restrict Water Traffic Restrict Rail Traffic Restrict Airspace Shelter		0929	0929	N/A	1017	1010	1018
First A&N Decision (State [made]; Local [received])		1032	1032	N/A	1032	1044	1034
Siren Sounding		1049	1049	1049	1047	1045	1044
EAS Broadcast Time		1056	1056	1056	1056	1056	1047
Second Precautionary/Protective Actions. Describe: Shelter in		1101	1101	N/A	1101	1101	1100
Siren Sounding		1104	1104	1104	1107	1104	1107
EAS Message Broadcast		1106	1106	1106	1106	1106	1110
KI Decision EWs		1032	1032	N/A	N/A	N/A	N/A
KI Decision General Public		1005	1005	N/A	N/A	N/A	N/A

Emergency Classification Level or Event	Time Utility Declared	2022 Millstone Biennial Exercise Timeline					
		Time that Notification Was Received at the Listed Location					
		City of Groton	Montville	Old Lyme	East Lyme	Town of Groton	Lyme
Unusual Event	0751	800	0756	0817	0756	0751	0757
Alert	0813	820	0817	0820	0818	0819	0817
SAE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GE	1000	1008	1007	1010	1012	1008	1008
Start of Simulated Radiation Release	1000	1008	1007	1010	1012	1000	1008
Termination of Simulated Radiation Release	1149	N/A	N/A	N/A	N/A	N/A	N/A
Facility Declared Operational		0817	0827	0837	0832	0824	0816
Governor's Declaration of State of Emergency		1017	1025	1017	1017	1033	1030
Declaration of Local Emergency		N/A	N/A	0904	1016	1016	N/A
Exercise Terminated		1153	1155	1200	1156	1157	1156
First Precautionary/Protective Actions: Describe: School and Day Care Dismissal Close Parks Restrict Water Traffic Restrict Rail Traffic Restrict Airspace Shelter		1020	1025	1028	1012	1035	1028
First A&N Decision (State [made]; Local [received])		1040	1036	1046	1033	1035	1030
Siren Sounding		1045	1048	1047	1045	1047	1045
EAS Broadcast Time		1056	-	1050	1057	-	1048
Second Precautionary/Protective Actions. Describe: Shelter in		1101	1059	N/A	1059	1059	N/A
Siren Sounding		1102	1105	1107	1104	1104	1107
EAS Message Broadcast		1103	-	1103	1106	-	1110
KI Decision EWs		N/A	N/A	N/A	N/A	N/A	N/A
KI Decision General Public		N/A	N/A	N/A	N/A	N/A	N/A

Emergency Classification Level or Event	Time Utility Declared	2022 Millstone Biennial Exercise Timeline					
		Time that Notification Was Received at the Listed Location					
		Town of Waterford	Ledyard				
Unusual Event	0751	0757	0757				
Alert	0813	0821	0819				
SAE	N/A	N/A					
GE	1000	1008	1008				
Start of Simulated Radiation Release	1000	1008	1008				
Termination of Simulated Radiation Release	1149	Ongoing	Ongoing				
Facility Declared Operational		0820	0840				
Governor's Declaration of State of Emergency		1033	1033				
Declaration of Local Emergency		1015	N/A				
Exercise Terminated		1155	1157				
First Precautionary/Protective Actions: Describe: School and Day Care Dismissal Close Parks Restrict Water Traffic Restrict Rail Traffic Restrict Airspace Shelter		0850	1034				
First A&N Decision (State [made]; Local [received])		1040	-				
Siren Sounding		1044	1047				
EAS Broadcast Time		-	-				
Second Precautionary/Protective Actions. Describe:		1058	-				
Siren Sounding		1102	1108				
EAS Message Broadcast		-	-				
KI Decision EWs		N/A	N/A				
KI Decision General Public		N/A	N/A				

Appendix B: Additional Information

Evaluation Team

Evaluated Exercise		November 1, 2022
Location	Name	Organization
CT State Emergency	Larry Broockerd	FEMA HQ
CT State Emergency	Jim Greer	ICF
CT Department of Energy	Michael Howe	FEMA HQ
CT Department of Energy	Reggie Rogers	ICF
Ct Joint Information Center	Barbara Thomas	FEMA Region 1
CT Joint Information Center	PJ Nied	ICF
Field Monitoring Team A	Ken Wierman	FEMA HQ
Field Monitoring Team B	Mike DeBonis	FEMA Region 2
CT 211	LaShawn Halsey	FEMA HQ
Millstone EOF	Marcy Campbell	ICF
CT DEMHS Region 4	John Rice	ICF
CT DEMHS Region 4	Paul Ringheiser	ICF
New London Local EOC	Linda Gee	FEMA Region 6
New London Local EOC	Misty Chance	FEMA Region 6
Fisher Island, NY EOC	Brian Hasemann	FEMA Region 2
Fisher Island, NY EOC	Brad DeKorte	FEMA Region 6
City of Groton Local EOC	Lisa Rink	FEMA HQ
City of Groton Local EOC	Melisa Ogrodnik	FEMA Region 6
Montville Local EOC	Cody McKown	FEMA Region 7
Montville Local EOC	Jon Christianson	ICF
Old Lyme Local EOC	Alberto Sifuentes	FEMA Region 9
Old Lyme Local EOC	Bruce Swiren	ICF
East Lyme Local EOC	Ryan Jones	RAC/DOT
East Lyme Local EOC	Rebecca Thomas	ICF
Town of Groton Local EOC	Matt Welshans	FEMA HQ

Town of Groton Local EOC	Joe Suders	FEMA Region 3
Lyme Local EOC	Alonzo McSwain	FEMA HQ
Lyme Local EOC	Gary Goldberg	ICF
Waterford Local EOC	Lee Torres	FEMA Region 3
Waterford Local EOC	Deborah Blunt	ICF
Ledyard Local EOC	Rahuel Preciado	FEMA Region 3
Ledyard Local EOC	Kevin Reed	ICF
Stonington EOC	John Rice	ICF
Evaluated MS-1 Drill November 30, 2022		
Location	Name	Organization
Waterford Ambulance From Millstone to Hospital	Barbara Thomas	FEMA Region 1
Middlesex Hospital	Helen LaForge	FEMA Region 1

Extent-of-Play Agreement(s)

ASSESSMENT AREA 1: EMERGENCY OPERATIONS MANAGEMENT:

Sub-element 1.a – Mobilization

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to alert, notify, and mobilize emergency personnel, and activate and staff emergency facilities.

Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654/ FEMA-REP-1, A.1.a, e; A.3, 4; C.1, 4, 6; D.4; E.1, 2; H.3, 4)

Core Capabilities Crosswalk: Operational Communications

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, out of sequence evaluation, or by means of drills conducted at any time.

Responsible OROs must demonstrate the capability to receive notification of an incident from the licensee; verify the notification, contact, alert, and mobilize key emergency personnel in a timely manner and demonstrate the ability to maintain and staff 24-hour operations. 24-hour operations can be demonstrated during the exercise via rosters or shift changes or otherwise in an actual activation. Local and/or Tribal responders must demonstrate the ability to receive and/or initiate notification to the licensees or other respective emergency management organizations of an incident in a timely manner when they receive information from the licensee or alternate sources. Responsible OROs must demonstrate the activation of facilities for immediate use by mobilized personnel upon their arrival. Activation of facilities and staff, including those associated with the ICS, must be completed in accordance with ORO plans/procedures. The location and contact information for facilities included in the incident command must be available to all appropriate responding agencies and the NPP after these facilities have been activated.

Pre-positioning of emergency personnel is appropriate, in accordance with the Extent-of-Play Agreement, at those facilities located beyond a normal commuting distance from the individual's duty location or residence. This includes the staggered release of resources from an assembly area. Additionally, pre-positioning of staff for out-of-sequence demonstrations may be used in accordance with the Extent-of-Play Agreement.

The REP program does not evaluate Incident Command Post tactical operations (e.g., Law Enforcement hostile action suppressions techniques), only coordination among the incident command, the utility, and all appropriate OROs, pursuant to plans/procedures.

Initial law enforcement, fire service, HAZMAT, and emergency medical response to the NPP site may impact the ability to staff REP functions. The ability to identify and request additional resources or identify compensatory measures must be demonstrated. Exercises must also address the role of mutual aid in the incident, as appropriate. An integral part of the response to an HAB scenario at an NPP may also be within the auspices of the Federal Government (e.g., FBI, NRC, or DHS). Protocols for requesting Federal, State, local, and Tribal law enforcement support must be demonstrated, as appropriate. Any resources must be on the ORO's mobilization list so they can be contacted during an incident, if needed.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play:

1. 24-hour staffing capability will be demonstrated via rosters
2. Supporting agencies may be pre-staged to reduce the response time during the rehearsal, but pre-staging during the evaluated exercise will be limited to:
 - a. State Department of Energy and Environmental Protection (DEEP) Field Teams will be pre-staged at the Millstone EOF Norwich, CT in conjunction with the exercise to perform field surveys
 - b. DEEP Field Team Coordinators (Electric Boat staff providing this support at the SEOC)
 - c. Any Radiological Operations Support Specialist (ROSS) asset may be pre-staged
3. Out of Sequence Demonstrations include:
 - a. Stonington (support community) – participates through communications (radio, telephone, etc.) through the Region 4 office.
 - b. CT State Police Troop E was evaluated on 11 August 2022 and CT DOT Norwich was evaluated 22 August 2022
 - c. Host Community / Reception Center activities – out of Sequence facilities to be demonstrated in within the current 8-year exercise cycle:
 - i. West Hartford (new facility) will be demonstrated OOS in 2023
 - d. Schools, Daycares, Congregate Care Facilities - out of sequence facilities to be demonstrated by interview in 2022 include:
 - i. Schools – East Lyme, Old Lyme
 - ii. Daycares – Groton City, Groton Town, Ledyard, Montville
 - iii. Congregate Care – New London

Sub-element 1.b - Facilities.**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have facilities to support the emergency response.

Criterion 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654/FEMA-REP-1, G.3.a; H.3; J.10.h; J.12; K.5.b)

Core Capabilities Crosswalk: NA

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, SAVs, or by out-of-sequence evaluations.

Responsible OROs must demonstrate, no less than every eight years, the availability of facilities to support accomplishment of emergency operations. This includes all alternative and backup facilities. Evaluations are typically performed for EOCs and JICs, as well as other facilities such as reception/relocation centers. Some of the areas evaluated within the facilities are adequate space, furnishings, lighting, restrooms, ventilation, access to backup power, and/or alternate facility, if required to support operations. Radio stations, laboratories, initial warning points and hospitals are not evaluated under 1.b.1.

In addition, facilities will be evaluated for this criterion during the first biennial exercise after any new or substantial changes in structure, equipment, or mission that affect key capabilities, as outlined in respective emergency plans/procedures. A substantial change is one that has a direct effect or impact on emergency response operations performed in those facilities.

Examples of substantial changes include modifying the size or configuration of an emergency operations center, adding more function to a center, or changing the equipment available for use in a center.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

Significant updates to ORO Facilities requiring evaluation:

1. East Lyme new EOC
2. West Hartford Host Community replacing East Hartford will be evaluated out of sequence in 2023
3. Windham Reception Center (Windham High School) undergoing renovations will be evaluated out of sequence
4. New London will utilize their mobile EOC that will be parked on the apron area of the building listed in Table A.1.
5. With the start of the new 8-year cycle, all EOCs will be evaluated during the rehearsal. If there are any noted issues, those EOCs will be evaluated again during the exercise.

Sub-element 1.c – Direction and Control

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to control their overall response to an emergency.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible. (NUREG-0654/FEMA-REP-1, A.1.d; A.2.a, b; A.3; C.4, 6)

Core Capabilities Crosswalk: Operational Communications, Operational Coordination, Situational Assessment

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished in a biennial or tabletop exercise.

Leadership personnel must demonstrate the ability to carry out the essential management functions of the response effort (e.g., keeping staff informed through periodic briefings and/or other means, coordinating with other OROs, and ensuring completion of requirements and requests.) Leadership must demonstrate the ability to prioritize resource tasking and replace/supplement resources (e.g., through MOUs or other agreements) when faced with competing demands for finite resources. Any resources identified through LOA/MOUs must be on the ORO's mobilization list so they may be contacted during an incident if needed.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. During exercise, DEMHS will follow the State Response Framework (SRF) (rev. July 2019) for position titles, and the revised checklists within the REP plan (Rev September 2019).
2. Until a Governor's State of Emergency is declared, local officials may make protective and precautionary decisions within their communities independently.

Sub-element 1.d – Communications Equipment

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs establish and operate reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as contiguous governments within the EPZ, Federal emergency response organizations, the licensee and its facilities, EOCs, Incident Command Posts, and FMTs.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations. (NUREG-0654/FEMA-REP-1, F.1, 2)

Core Capabilities Crosswalk: Operational Communications

Assessment/Extent of Play

Assessment of this Demonstration Criterion is accomplished initially in a baseline evaluation and subsequently in periodic testing and drills. System familiarity and use must be demonstrated as applicable in biennial or tabletop exercises, or if their use would be required, during an actual event.

OROs must demonstrate that a primary system and at least one backup system are fully functional at all times. Communications systems are maintained and tested on a recurring basis throughout the assessment period and system status is available to all operators. Periodic test results and corrective actions are maintained on a real time basis. If a communications system or systems are not functional, but exercise performance is not affected, no exercise issue will be assessed.

Communications equipment and procedures for facilities and field units are used as needed for transmission and receipt of exercise messages. All facilities, FMTs, and incident command must have the capability to access at least one communication system that is independent of the commercial telephone system. Responsible OROs must demonstrate the capability to manage the communication systems and ensure that all message traffic is handled without delays that might disrupt emergency operations. OROs must ensure that a coordinated communication link for fixed and mobile medical support facilities exists. Exercise scenarios may require the failure of a communication system and use of an alternate system, as negotiated in the Extent-of-Play Agreement.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. Injects will prompt demonstration of backup communication systems

Sub-element 1.e – Equipment and Supplies to Support Operations**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have emergency equipment and supplies adequate to support the emergency response.

Criterion 1.e.1: Equipment, maps, displays, monitoring instruments, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations (NUREG-0654/FEMA-REP-1, H.7, 10; I.7, 8, 9; J.10.a, b, e; J.11, 12; K.3.a; K.5.b)

Core Capabilities Crosswalk: Environmental Response/Health and Safety, Mass Care Services, Public and Private Services and Resources, and Public Health and Medical Services

Assessment/Extent of Play

Assessment of this Demonstration Criterion is accomplished primarily through a baseline evaluation and subsequent periodic inspections.

A particular facility's equipment and supplies must be sufficient and consistent with that facility's assigned role in the ORO's emergency operations plans. Use of maps and other displays is encouraged. For non-facility-based operations, the equipment and supplies must be sufficient and consistent with the assigned operational role. At locations where traffic and access control personnel are deployed, appropriate equipment (e.g., vehicles, barriers, traffic cones, and signs) must be available, or their availability described.

Specific equipment and supplies that must be demonstrated under this criterion include KI inventories, dosimetry, and monitoring equipment, as follows:

KI: Responsible OROs must demonstrate the capability to maintain inventories of KI sufficient for use by: (1) emergency workers; (2) institutionalized individuals, as indicated in capacity lists for facilities; and (3) where stipulated by the plans/procedures, members of the general public (including transients) within the plume pathway EPZ. In addition, OROs must demonstrate provisions to make KI available to specialized response teams (e.g., civil support team, Special Weapons and Tactics Teams, urban search and rescue, bomb squads, HAZMAT, or other ancillary groups) as identified in plans/procedures. The plans/procedures must include the forms to be used for documenting emergency worker ingestion of KI, as well as a mechanism for identifying emergency workers that have declined KI in advance. Consider carefully the placement of emergency workers that have declined KI in advance.

ORO quantities of dosimetry and KI available and storage locations(s) will be confirmed by physical inspection at the storage location(s) or through documentation of current inventory submitted during the exercise, provided in the ALC submission, and/or verified during an SAV. Available supplies of KI must 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.

Dosimetry: Sufficient quantities of appropriate direct-reading and permanent record dosimetry and dosimeter chargers must be available for issuance to all emergency workers who will be dispatched to perform an ORO mission. In addition, OROs must demonstrate provisions to make dosimetry available to specialized response teams (e.g., civil support team, Special Weapons and Tactics Teams, urban search and rescue, bomb squads, HAZMAT, or other ancillary groups) as identified in plans/procedures.

Appropriate direct-reading dosimetry must allow an individual(s) to read the administrative reporting limits and maximum exposure limits contained in the ORO's plans/procedures.

Direct-reading dosimeters must be zeroed or operationally checked prior to issuance. The dosimeters must be inspected for electrical leakage at least annually and replaced when necessary. Civil Defense Victoreen Model 138s (CD V-138s) (0-200 mR), due to their documented history of electrical leakage problems, must be inspected for electrical leakage at least quarterly and replaced when necessary. This leakage testing will be verified during the exercise, through documentation submitted in the ALC and/or through an SAV. Operational checks and testing of electronic dosimeters must be in accordance with the manufacturer's instructions and be verified during the exercise, through documentation submitted in the ALC and/or through an SAV.

Sub-element 1.e – Equipment and Supplies to Support Operations (continued)

Monitoring Instruments: All instruments must be inspected, inventoried, and operationally checked before each use. Instruments must be calibrated in accordance with the manufacturer's recommendations. Unmodified CDV-700 series instruments and other instruments without a manufacturer's recommendation must be calibrated annually. Modified CDV-700 instruments must be calibrated in accordance with the recommendation of the modification manufacturer. A label indicating such calibration must be on each instrument or calibrated frequency can be verified by other means. In addition, instruments being used to measure activity must have a sticker-affixed to their sides indicating the effective range of the readings. The range of readings documentation specifies the acceptable range of readings that the meter should indicate when it is response-checked using a standard test source.

For FMTs, the instruments must be capable of measuring gamma exposure rates and detecting beta radiation. These instruments must be capable of measuring a range of activity and exposure, including radiological protection/exposure control of team members and detection of activity on air sample collection media, consistent with the intended use of the instrument and the ORO's plans/procedures. An appropriate radioactive check source must be used to verify proper operational response for each low-range radiation measurement instrument (less than 1R/hr) and for high-range instruments when available. If a source is not available for a high-range instrument, a procedure must exist to operationally test the instrument before entering an area where only a high-range instrument can make useful readings.

In areas where portal monitors are used, the OROs must set up and operationally check the monitor(s). The monitor(s) must conform to the standards set forth in the *Contamination Monitoring Standard for a Portal Monitor Used for Emergency Response*, FEMA-REP-21 (March 1995) or in accordance with the manufacturer's recommendations.

Mutual Aid Resources: If the incoming resources arrive with their own equipment (i.e., monitors and/or dosimetry), they will be evaluated by REP Program Standards. FEMA will not inventory equipment that is not part of the REP Program. If an agency has a defined role in the REP Plan, they are subject to the planning process and standards, as well as the guidance of this manual.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play:

1. *DEEP field team kits are inventoried quarterly. FEMA evaluators may be provided evidence of inventory out of sequence.*

**This criterion has been approved for re-demonstration of performance only, actual equipment cannot be re-demonstrated.*

ASSESSMENT AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.a – Emergency Worker Exposure Control

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to assess and control the radiation exposure received by emergency workers and have a decision chain in place, as specified in the ORO's plans/procedures, to authorize emergency worker exposure limits to be exceeded for specific missions.

Radiation exposure limits for emergency workers are the recommended accumulated dose limits or exposure rates that emergency workers may be permitted to incur during an emergency. These limits include any pre-established administrative reporting limits (that take into consideration TEDE or organ-specific limits) identified in the ORO's plans/procedures.

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers, including provisions to authorize radiation exposure in excess of administrative limits or protective action guides. (NUREG-0654/FEMA-REP-1, C.6; f; K.3.a; K.4)

Core Capabilities Crosswalk: Environmental Response/Health Safety, Situational Awareness, and Operational Coordination

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be assessed concurrently with a licensee exercise and may be demonstrated in a biennial or tabletop exercise.

ORO's authorized to send emergency workers into the plume exposure pathway EPZ must demonstrate a capability to comply with emergency worker exposure limits based on their emergency plans/procedures.

Participating OROs must also demonstrate the capability to make decisions concerning authorization of exposure levels in excess of pre-authorized levels and the number of emergency workers receiving radiation doses above pre-authorized levels. This would include providing KI and dosimetry in a timely manner to emergency workers dispatched onsite to support plant incident assessment and mitigating actions, in accordance with respective plans/procedures.

As appropriate, OROs must demonstrate the capability to make decisions on the distribution and administration of KI as a protective measure for emergency workers, based on their plans/procedures or projected thyroid dose compared with the established PAGs for KI administration.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. If scenario conditions do not require dose extension, discussion may be facilitated by controller "what if" inject / evaluation interview.

Sub-element 2.b. – Radiological Assessment, Protective Action Recommendations, and Precautionary and/or Protective Action Decisions for the Plume Phase of the Emergency

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to independently project integrated dose from projected or actual dose rates and compare these estimates to the PAGs.

OROs must have the capability to choose, among a range of protective actions, those most appropriate in a given emergency. OROs base these choices on PAGs from their plans/procedures or EPA's *Manual of Protective Action Guides and Protective Actions for Nuclear Incidents* and other criteria, such as plant conditions, licensee PARs, coordination of precautionary and/or protective action decisions with other political jurisdictions (e.g., other affected OROs and incident command), availability of in-place shelter, weather conditions, and situations, to include HAB incidents, the threat posed by the specific hostile action, the affiliated response, and the effect of an evacuation on the threat response effort that create higher than normal risk from general population evacuation.

Criterion 2.b.1: Appropriate protective action recommendations (PARs) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions. (NUREG-0654/FEMA-REP-1, I.10 and Supplement 3)

Core Capabilities Crosswalk: Environmental Response/Health Safety, Operational Communications, Situational Awareness, Operational Coordination, and Intelligence and Information Sharing

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be accomplished concurrently with a licensee exercise and may be demonstrated in biennial or tabletop exercise.

During the initial stage of the emergency response, following notification of plant conditions that may warrant offsite protective actions, the ORO must demonstrate the capability to use appropriate means, described in the plans/procedures, to develop PARs for decision-makers based on available information and recommendations provided by the licensee, as well as field monitoring data, if available. The ORO must also consider any release and meteorological data provided by the licensee.

The ORO must demonstrate a reliable capability to independently validate dose projections. The types of calculations to be demonstrated depend on the data available and the need for assessments to support the PARs must be appropriate to the scenario. In all cases, calculation of projected dose must be demonstrated. Projected doses must be related to quantities and units of the PAG to which they will be compared. PARs must be promptly transmitted to decision-makers in a pre-arranged format.

When the licensee and ORO projected doses differ by more than a factor of 10, the ORO and licensee must determine the source of the difference by discussing input data and assumptions, using different models, or exploring possible reasons. Resolution of these differences must be incorporated into the PARs if timely and appropriate. The ORO must demonstrate the capability to use any additional data to refine projected doses and exposure rates and revise the associated PARs.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Until a Governor's State of Emergency is declared, local officials may make protective and precautionary decisions within their communities independently.*
 - Article I.*
 - Article II.*
 - Article III.*
 - Article IV.*

Sub-element 2.b. – Radiological Assessment, Protective Action Recommendations, and Precautionary and/or Protective Action Decisions for the Plume Phase of the Emergency (Continued)

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make precautionary and/or protective action decisions for the general public (including the recommendation for the use of KI, if ORO policy). (NUREG-0654/FEMA-REP-1, A.3; C.4, 6; D.4; J.9; J.10.e, f; m)

Core Capabilities Crosswalk: Environmental Response/Health Safety, Operational Communications, and Situational Awareness

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be accomplished concurrently with a licensee exercise and may be demonstrated in a biennial or tabletop exercise.

OROs must have the capability to make both initial and subsequent precautionary and/or protective action decisions. OROs must demonstrate the capability to make initial precautionary and/or protective action decisions in a timely manner appropriate to the incident, based on information from the licensee, assessment of plant status and potential or actual releases, other available information related to the incident, input from appropriate ORO authorities (e.g., incident command), and PARs from the utility and ORO staff. In addition, a subsequent or alternate precautionary and/or protective action decision may be appropriate if various conditions (e.g., an HAB incident, weather, release timing and magnitude) pose undue risk to an evacuation or if evacuation may disrupt the efforts to respond to a hostile action.

OROs must demonstrate the ability to obtain supplemental resources (e.g., mutual aid) necessary to implement a precautionary and/or protective action decision if local law enforcement, fire service, HAZMAT, and emergency medical resources are used to augment response to the NPP site or other key infrastructure.

Dose assessment personnel may provide additional PARs based on the subsequent dose projections, field monitoring data, or information on plant conditions. In addition, incident command must provide input regarding considerations for subsequent PARs based on the magnitude of the ongoing threat, the response, and/or site conditions. The decision-makers must demonstrate the capability to change protective actions based on the combination of all these factors.

If the ORO has determined that KI will be used as a protective measure for the general public under offsite plans/procedures, then it must demonstrate the capability to make decisions on the distribution and administration of KI to supplement sheltering and evacuation. This decision must be based on the ORO's plans/procedures or projected thyroid dose compared with the established PAG for KI administration. The KI decision-making process must involve close coordination with appropriate assessment and decision-making staff.

If more than one ORO is involved in decision making, all appropriate OROs must communicate and coordinate precautionary and/or protective action decisions with each other. In addition, decisions must be coordinated/communicated with incident command. OROs must demonstrate the capability to communicate the results of decisions to all the affected locations.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Until a Governor's State of Emergency is declared, local officials may make protective and precautionary action decisions within their communities independently.*
2. *The role of the Governor of the State of Connecticut in the SEOC including making Protective Action Decisions (PADs) may be simulated by a role player.*

Sub-element 2.c – Precautionary and/or Protective Action Decision Consideration for the Protection of Persons with Disabilities and Access/Functional Needs**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to determine precautionary and/or protective action decisions, including evacuation, sheltering, and use of KI, if applicable, for groups of persons with disabilities and access/functional needs (e.g., hospitals, nursing homes, correctional facilities, schools, licensed daycares, mobility-impaired individuals, and transportation-dependent individuals). The focus is on those groups of persons with disabilities and access/functional needs that are or potentially will be affected by a radiological release from an NPP.

Criterion 2.c.1: Precautionary and/or protective action decisions are made, as appropriate, for groups of persons with disabilities and access/functional needs. (NUREG-0654/FEMA-REP-1, D.4; J.9; J.10.d, e)

Core Capabilities Crosswalk: Operational Communications, and Situational Assessment, Operational Coordination, Intelligence and Information Sharing

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be accomplished concurrently with a licensee exercise and may be demonstrated in a biennial or tabletop exercise that would include the use of plant conditions transmitted from the licensee.

Usually it is appropriate to implement evacuation in areas where doses are projected to exceed the lower end of the range of PAGs, except for incidents where there is a high-risk environmental condition or where high-risk groups (e.g., the immobile or infirm) are involved. In these cases, factors that must be considered include weather conditions, shelter availability, availability of transportation assets, risk of evacuation versus risk from the avoided dose, and precautionary school evacuations. In addition, decisions must be coordinated/communicated with the incident command. In situations where an institutionalized population cannot be evacuated, the ORO must consider use of KI.

Applicable OROs must demonstrate the capability to alert and notify all public school systems/districts of emergency conditions that are expected to or may necessitate protective actions for students. Demonstration requires that the OROs actually contact public school systems/districts during the exercise.

The OROs must demonstrate how the decisions-making process take those with disabilities and access/functional needs (e.g., nursing homes, correctional facilities, licensed day cares, mobility-impaired individuals, and transportation-dependent individuals) into account.

In accordance with plans/procedures, OROs and/or officials of public school systems/districts must demonstrate the capability to make prompt decisions on protective actions for students. The decision-making process, including any preplanned strategies for protective actions for that ECL, must consider the location of students at the time (e.g., whether the students are still at home, en route to school, or at school).

Since other agencies place requirements on hospitals to prepare for contaminated patients, the REP Program has no need to evaluate hospitals in the EPZ that need to evacuate, or the facilities that are receiving these evacuees, nor does the ORO have the responsibility to provide training or dosimetry to these hospitals/facilities. Additionally, hospital evacuation plans do not need to be reviewed or tested by the REP Program.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. OROs will consider Early Dismissal as a precautionary action, in addition to a Precautionary School Transfer, based on scenario conditions

2. OROs may also consider a “lock-down” or “shelter-in-place” PAD based on current conditions.
Article V.
Article VI.

Sub-element 2.d. – Radiological Assessment and Decision Making for the Ingestion Exposure Pathway

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the means to assess the radiological consequences for the ingestion exposure pathway, relate them to the appropriate PAGs, and make timely, appropriate PADs to mitigate exposure from the pathway.

During an incident at an NPP, a release of radioactive material may contaminate water supplies and agricultural products in the surrounding areas. Any such contamination would likely occur during the plume phase of the incident and, depending on the nature of the release, could impact the ingestion exposure pathway for weeks or years.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria. (NUREG-0654/FEMA-REP-1, A.3; C.1, 4; D.4; J.9, 11)

Core Capabilities Crosswalk: Operational Coordination, Environmental Response/Health Safety, and Situational Assessment

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be accomplished concurrently with a licensee exercise and may be demonstrated in a biennial or tabletop exercise that would include the use of plant conditions transmitted from the licensee.

OROs are expected to take precautionary actions to protect food and water supplies, or to minimize exposure to potentially contaminated water and food, in accordance with their respective plans/procedures. Often OROs initiate such actions based on criteria related to the facility's ECLs. Such actions may include recommendations to place milk animals on stored feed and use protected water supplies.

The ORO must use its procedures to assess the radiological consequences of a release on the food and water supplies, such as the development of a sampling plan. The ORO's assessment must include evaluation of the radiological analyses of representative samples of water, food, and other ingestible substances of local interest from potentially impacted areas; characterization of the releases from the facility; and the extent of areas potentially impacted by the release. During this assessment, OROs must consider use of agricultural and watershed data within the 50-mile EPZ. The radiological impacts on the food and water must then be compared to the appropriate ingestion PAGs contained in the ORO's plans/procedures. The plans/procedures contain PAGs based on specific dose commitment criteria or on criteria as recommended by current Food and Drug Administration (FDA) guidance. Timely and appropriate recommendations must be provided to the ORO decision-makers group for implementation decisions. OROs may also include a comparison of taking or not taking a given action on the resultant ingestion exposure pathway dose commitments.

The ORO must demonstrate timely decisions to minimize radiological impacts from the ingestion exposure pathway, based on the given assessments and other information. Any such decisions must be communicated and, to the extent practical, coordinated with neighboring OROs. These decisions include tracking agricultural products entering and leaving the EPX. Demonstration of plans and procedures which use traffic access control points to track agricultural products entering and leaving the EPZ may be conducted through interview.

ORO will use Federal resources, as identified in the Nuclear/Radiological Incident Annex of the NRF and other resources (e.g., compacts or nuclear insurers), as necessary. Evaluation of this criterion will take into consideration the level of Federal and other participating resources.

All **activities** must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: *Limited – Not Evaluated*

Post plume activities (Ingestion, Relocation, Reentry, Return) were demonstrated in 2021. Demonstration in 2022 is limited to the precautionary decisions associated with the plume phase.

Sub-element 2.e. – Radiological Assessment and Decision Making Concerning Post-Plume Phase Relocation, Reentry, and Return

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to make decisions on post-plume phase *relocation*, *reentry*, and *return* of the general public. These decisions are essential for protection of the public from direct long-term exposure to deposited radioactive materials from a severe incident at an NPP.

Criterion 2.e.1: *Timely post-plume phase relocation, reentry, and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the ORO's plan and/or procedures. (NUREG-0654/FEMA-REP-1, I.10; J.9; K.3.a; M.1)*

Core Capabilities Crosswalk: *Operational Coordination, Environmental Response/Health Safety, Situational Assessment, Economic Recovery, Health and Social Services, Housing, and Natural and Cultural Resources*

Assessment/Extent of Play

Assessment of this Demonstration Criterion must be accomplished concurrently with a licensee exercise and may be demonstrated in a biennial or tabletop exercise that would include the use of plant conditions transmitted from the licensee.

Relocation: OROs must demonstrate the capability to estimate integrated dose in contaminated areas and compare these estimates with PAGs; apply decision criteria for relocation of those individuals in the general public who have not been evacuated, but where actual or projected doses are in excess of relocation PAGs; and control access to evacuated and restricted areas. OROs will make decisions for relocating members of the evacuated public who lived in areas that now have residual radiation levels in excess of the PAGs. Determination of areas to be restricted must be based on factors such as the mix of radionuclides in deposited materials, calculated exposure rates versus the PAGs, and analyses of vegetation and soil field samples.

Reentry: Decisions must be made on location of control points and policies regarding access and exposure control for emergency workers and members of the general public who need to temporarily enter the evacuated area to perform specific tasks or missions.

Examples of control procedures are the assignment of, or checking for, direct-reading and permanent record dosimetry for emergency workers; questions regarding an individual's objectives, locations expected to be visited, and associated timeframes; availability of maps and plots of radiation exposure rates; and advice on areas to avoid. Control procedures also include monitoring of individuals, vehicles, and equipment; the implementation of decision criteria regarding decontamination; and proper disposition of emergency worker dosimetry and maintenance of emergency worker radiation exposure records. Responsible OROs must demonstrate the capability to develop a strategy for authorized reentry of individuals into the restricted zone(s), based on established decision criteria. OROs must demonstrate the capability to modify those policies for security purposes (e.g., police patrols), maintenance of essential services (e.g., fire protection and utilities), and other critical functions. They must demonstrate the capability to use decision-making criteria in allowing access to the restricted zone by the public for various reasons, such as to maintain property (e.g., to care for farm animals or secure machinery for storage) or retrieve important possessions. Coordinated policies for access and exposure control must be developed among all agencies with roles to perform in the restricted zone(s). OROs must demonstrate the capability to establish policies for provision of dosimetry to all

individuals allowed to reenter the restricted zone(s). The extent to which OROs need to develop policies on reentry will be determined by scenario events.

Sub-element 2.e. – Radiological Assessment and Decision Making Concerning Post-Plume Phase Relocation, Reentry, and Return (continued)

Return: OROs must demonstrate the capability to implement policies concerning return of members of the public to areas that were evacuated during the plume phase (i.e., permitting populations that were previously evacuated to reoccupy their homes and businesses on an unrestricted basis). OROs must base decisions on environmental data and political boundaries or physical/ geological features, which allow identification of the boundaries of areas to which members of the general public may return. Return is permitted to the boundary of the restricted area(s) that is based on the relocation PAG.

Other factors that the ORO must consider in decision-making include conditions that permit cancellation of the ECL and relaxation of associated restrictive measures. OROs must base return recommendations on measurements of radiation from ground deposition. OROs must have the capability to identify services and facilities that require restoration within a few days and to identify the procedures and resources for their restoration. Examples of these services and facilities are medical and social services, utilities, roads, schools, and intermediate-term housing for relocated persons.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: *N/A*

Post plume activities (Ingestion, Relocation, Reentry, Return) were demonstrated in 2021.

ASSESSMENT AREA 3: PROTECTIVE ACTION IMPLEMENTATION

Sub-element 3.a – Implementation of Emergency Worker Exposure Control

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to provide for the following: distribution, use, collection, and processing of direct-reading dosimetry and permanent record dosimetry; reading of direct-reading dosimetry by emergency workers at appropriate frequencies; maintaining a radiation dose record for each emergency worker; establishing a decision chain or authorization procedure for emergency workers to incur radiation exposures in excess of the PAGs, and the capability to provide KI for emergency workers, always applying the “as low as is reasonably achievable” principle as appropriate.

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plans/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers. (NUREG-0654/FEMA-REP-1, K.3.a, b; K.4)

Core Capabilities Crosswalk: Operational Coordination and Environmental Response/Health Safety

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial or tabletop exercise. Other means may include drills, seminars or training activities that would fully demonstrate technical proficiency.

OROs must demonstrate the capability to provide emergency workers (including supplemental resources) with the appropriate direct-reading and permanent record dosimetry, dosimeter chargers, KI, and instructions on the use of these items. For evaluation purposes, appropriate direct-reading dosimetry is defined as dosimetry that allows an individual(s) to read the administrative reporting limits that are pre-established at a level low enough to consider subsequent calculation of TEDE and maximum exposure limits, for those emergency workers involved in lifesaving activities, contained in the ORO's plans/procedures.

Each emergency worker must have basic knowledge of radiation exposure limits as specified in the ORO's plans/procedures. If supplemental resources are used, they must be provided with just-in-time training to ensure basic knowledge of radiation exposure control. Emergency workers must demonstrate procedures to monitor and record dosimeter readings and manage radiological exposure control.

During a plume phase exercise, emergency workers must demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached. The emergency worker must report accumulated exposures during the exercise as indicated in the plans/procedures. OROs must demonstrate the actions described in the plans/procedures by determining whether to replace the worker, authorize the worker to incur additional exposures, or take other actions. If exercise play does not require emergency workers to seek authorizations for additional exposure, evaluators must interview at least two workers to determine their knowledge of whom to contact in case authorization is needed, and at what exposure levels. Workers may use any available resources (e.g., written procedures and/or coworkers) 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. In such cases, adequate control of exposure can be achieved for all team members using one direct-reading dosimeter worn by the team leader. Emergency workers assigned to low-exposure rate fixed facilities (e.g., EOCs and communications center within the EPZ, reception centers, and counting laboratories) may have individual direct-reading dosimeters or they may be monitored using group dosimetry (i.e.,

Sub-element 3.a – Implementation of Emergency Worker Exposure Control (continued)

direct-reading dosimeters strategically placed in the work area). Each team member must still have his or her own permanent record dosimetry. Individuals authorized by the ORO to reenter an evacuated area during the plume (emergency) phase, must be limited to the lowest radiological exposure commensurate with completing their missions.

OROs may have administrative limits lower than EPA-400-R-92-001 dose limits for emergency workers performing various services (e.g., lifesaving, protection of valuable property, all activities). OROs must ensure that the process used to seek authorization for exceeding dose limits does not negatively impact the capability to respond to an incident where lifesaving and/or protection of valuable property may require an urgent response.

OROs must demonstrate the capability to accomplish distribution of KI to emergency workers consistent with decisions made. OROs must have the capability to develop and maintain lists of emergency workers who have ingested KI, including documentation of the date(s) and time(s) they did so. Ingestion of KI recommended by the designated ORO health official is voluntary. For evaluation purposes, the actual ingestion of KI shall not be performed. OROs must demonstrate the capability to formulate and disseminate instructions on using KI for those advised to take it. Emergency workers must demonstrate basic knowledge of procedures for using KI whether or not the scenario drives the implementation of KI use. This can be accomplished by an interview with the evaluator.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Dosimetry and KI will be issued to a minimum of three individuals within the local EOCs. However, KI will not be ingested at any time during the exercise.*
2. *Donning of PPE will be notional as emergency workers will not wear Protective Clothing or Equipment while in view of the public.*
3. *Emergency workers will read dosimetry at regular intervals, OR AS DIRECTED / INSTRUCTED.*
4. *If scenario conditions do not result in increased dose to workers:*
 - a. *Response to increased readings on SRD will be performed by interview.*
5. *FEMA evaluator will evaluate a dosimetry briefing and issue in the following facilities:*
 - a. *DEEP field teams at Millstone EOF in Norwich.*
 - b. *Local EOCs*
 - c. *CT State Police Troop E out of sequence*
 - d. *CT DOT Norwich out of sequence*
 - e. *Transportation Staging Area out of sequence within 8-year exercise cycle*
 - f. *Host Community / Reception Center out of sequence within 8-year exercise cycle*
 - g. *Post Plume Sampling Teams out of sequence within 8-year exercise cycle*
6. *FEMA evaluator will evaluate worker understanding of dosimetry brief by interview – worker will be allowed to use any available resources to respond to this interview*

**This criterion has been approved for re-demonstration during the exercise.*

Sub-element 3.b – Implementation of KI Decision for Institutionalized Individuals and the General Public**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to provide KI for institutionalized individuals, and, if in the plans/procedures, to the general public for whom immediate evacuation may not be feasible, very difficult, or significantly delayed. While it is necessary for OROs to have the capability to provide KI to institutionalized individuals, providing KI to the general public is an ORO option and must be reflected as such in ORO plans/procedures. Provisions must include the availability of adequate quantities, storage, and means of distributing KI.

Criterion 3.b.1: KI and appropriate instructions are available if a decision to recommend use of KI is made. Appropriate record-keeping of the administration of KI for institutionalized individuals is maintained. (NUREG-0654/FEMA-REP-1, J.10.e, f)

Core Capabilities Crosswalk: Public Information and Warning Operational Coordination, Environmental Response/Health Safety, and Public and Private Services

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial or tabletop exercise. Other means may include drills, seminars or training activities that would fully demonstrate technical proficiency.

ORO must demonstrate the capability to make KI available to institutionalized individuals, and, where provided for in their plans/procedures, to members of the general public. OROs must demonstrate the capability to accomplish distribution of KI consistent with decisions made. OROs must have the capability to develop and maintain lists of institutionalized individuals who have ingested KI, including documentation of the date(s) and time(s) they were instructed to ingest KI. Ingestion of KI recommended by the designated ORO health official is voluntary. For evaluation purposes, the actual ingestion of KI shall not be performed. OROs must demonstrate the capability to formulate and disseminate instructions on using KI for those advised to take it.

If a recommendation is made for the general public to take KI, appropriate information must be provided to the public by the means of notification specified in the ORO's plans/procedures.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *This criterion will be evaluated out of sequence at scheduled long term care facilities.*
2. *KI is pre-distributed / made available to the public in the plume EPZ. KI is not distributed to the public in the EPZ during emergency response but is available in the Host Community Reception Centers. The backup distribution of KI at reception centers will be demonstrated out of sequence at scheduled Host Community exercises.*

**This criterion has been approved for re-demonstration during exercises.*

Sub-element 3.c – Implementation of Precautionary and/or Protective Actions for Persons with Disabilities and Access/Functional Needs

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement precautionary and/or protective action decisions, including evacuation and/or sheltering, for all persons with disabilities and access/functional needs. The focus is on those persons with disabilities and access/functional needs that are (or potentially will be) affected by a radiological release from an NPP.

Criterion 3.c.1: Precautionary and/or protective action decisions are implemented for persons with disabilities and access/functional needs other than schools within areas subject to protective actions. (NUREG-0654/FEMA-REP-1, J.10.c, d, e, g)

Core Capabilities Crosswalk: Public Information and Warning, Operational Coordination, Critical Transportation, Environmental Response/Health Safety, and Public and Private Services and Resources

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or by means of drills conducted at any time.

Applicable OROs must demonstrate the capability to alert and notify (i.e., provide PARs and emergency information and instructions to) persons with disabilities and access/functional needs, including hospitals/medical facilities, licensed day cares, nursing homes, correctional facilities, and mobility-impaired and transportation-dependent individuals. OROs must demonstrate the capability to provide for persons with disabilities and access/functional needs in accordance with plans/procedures.

Contact with persons with disabilities and access/functional needs and reception facilities may be actual or simulated, as agreed to in the extent of play. Some contacts with transportation providers must be actually contacted, as negotiated in the extent of play. All actual and simulated contacts must be logged.

Since other agencies place requirements on hospitals to prepare for contaminated patients, the REP Program has no need to evaluate hospitals in the EPZ that need to evacuate, or facilities that are receiving these evacuees, nor does the ORO have the responsibility to provide training or dosimetry to these hospitals/facilities. Additionally, hospital evacuation plans do not need to be reviewed or tested by the REP Program.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *EPZ towns will demonstrate this objective through interview, including:*
 - a. *Identification of Functional Needs populations*
 - b. *Identifying and securing transportation requirements*
2. *Long Term Care Facilities will be evaluated by FEMA with a DEMHS representative to discuss their emergency procedures.*
 - a. *In 2022, the long term care facilities to be interviewed Out of Sequence are in New London*

Sub-element 3.c – Implementation of Protective Actions for Persons with Disabilities and Access/Functional Needs (Continued)

Criterion 3.c.2: OROs/School officials implement precautionary and/or protective actions for schools. (NUREG-0654/FEMA-REP-1, J.10.c, d, e, g)

Core Capabilities Crosswalk: Operational Coordination, Critical Transportation, and Environmental Response/Health Safety

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial, or tabletop exercise, an actual event, staff assistance visit, or by means of drills conducted at any time.

School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective actions for students. The demonstration must be made as follows: Each school system/district within the 10 mile EPZ must demonstrate implementation of protective actions. At least one school per affected system/district must participate in the demonstration. Canceling the school day, dismissing early, or sheltering in place must be simulated by describing to evaluators the procedures that would be followed. If evacuation is the implemented protective action, all activities to coordinate and complete the evacuation of students to reception centers, congregate care centers, or host schools may actually be demonstrated or accomplished through an interview process.

If accomplished through an interview, appropriate school personnel including decision-making officials (e.g., schools 'superintendent/principals and transportation director/bus dispatchers) and at least one bus driver (and the bus driver's escort, if applicable) must be available to demonstrate knowledge of their role(s) in the evacuation of school children. Communications capabilities between school officials and the buses, if required by the plans/procedures, must be verified.

Officials of the school system(s) must demonstrate the capability to develop and provide timely information to OROs for use in messages to parents, the general public, and the media on the status of protective actions for schools.

If a school facility has emergency plans as a condition of licensing, those plans may be submitted to FEMA review in place of demonstration or interview pursuant to the OROs plans/procedures as negotiated in the Extent-of-Play Agreement.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *East Lyme and Old Lyme schools will discuss the ability and resources necessary to implement protective actions for their school children. The designated school officials will choose the specific schools to be surveyed. Such interviews will be conducted with School Superintendents out of sequence in 2022. This criterion will be evaluated at each EPZ EOC through demonstration or interview (per scenario)*
2. *Day Care site visits will be scheduled with operating facilities in Groton City, Groton Town, Ledyard and Montville out of sequence in 2022.*
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Sub-element 3.d. – Implementation of Traffic and Access Control**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement protective action plans/procedures, including relocation and restriction of access to evacuated/sheltered areas. This Sub-element focuses on selecting, establishing, and staffing of traffic and access control points, and removal of impediments to the flow of evacuation traffic.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel. (NUREG-0654/FEMA-REP-1, A.3; C.1, 4; J.10.g, j)

Core Capabilities Crosswalk: Operational Coordination, Critical Transportation, and on scene Security and Protection

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, staff assistance visit, or by means of drills conducted at any time.

ORO must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and PADs (e.g., evacuating, sheltering, and relocation) in a timely manner. OROs must demonstrate the capability to provide instructions to traffic and access control staff on actions to take when modifications in protective action strategies necessitate changes in evacuation patterns or in the area(s) where access is controlled.

Traffic and access control staff must demonstrate accurate knowledge of their roles and responsibilities, including verifying emergency worker identification and access authorization to the affected areas, as per the Extent-of-Play Agreement. These capabilities may be demonstrated by actual deployment or by interview, in accordance with the Extent-of-Play Agreement.

In instances where OROs lack authority necessary to control access by certain types of traffic (e.g., rail, water, and air traffic), they must demonstrate the capability to contact the State or Federal agencies that have the needed authority, as agreed upon in the Extent-of-Play Agreement.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Traffic and access control will be demonstrated through interview with State and Local Law Enforcement at the State Emergency Operations Center (SEOC) and Local Emergency Operations Centers (LEOCs).*
2. *Traffic control assets will not be deployed to the field.*
3. *Out of Sequence evaluations with CT DOT-Norwich and CT State Police*

Sub-element 3.d. – Implementation of Traffic and Access Control (Continued)

Criterion 3.d.2: Impediments to evacuation are identified and resolved. (NUREG-0654/FEMA-REP-1, J.10.k)

Core Capabilities Crosswalk: Operational Coordination, Critical Transportation, and Infrastructure Systems

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, staff assistance visit, or by means of drills conducted at any time.

OROs must demonstrate the capability to identify and take appropriate actions concerning impediments to evacuations. In demonstrating this capability, the impediment must remain in place during the evacuation long enough that re-routing of traffic is required and must also result in demonstration of decision-making and coordination with the JIC to communicate the alternate route to evacuees.

When, due to specifics of the scenario or jurisdiction, the impediment cannot be located on an evacuation route, it must be located so as to impact evacuation. When not possible, actual dispatch of resources need not to be physically demonstrated; however, all contacts, actual or simulated, must be logged.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *The exercise scenario will include traffic impediments for select towns within the EPZ. However, if scenario conditions do not cause a traffic impediment within a specific town, criteria will be met through evaluator interviews at that specific location.*
2. *Traffic and access control will be demonstrated through interview with State and Local Law Enforcement at the State Emergency Operations Center (SEOC) and Local Emergency Operations Centers (LEOCs).*
3. *Reporting of traffic impediments to the SEOC and coordination with the JIC will be demonstrated-in selected towns, and discussed in all others.*

**This criterion has been approved for re-demonstration during the exercise.*

Sub-element 3.e – Implementation of Ingestion Exposure Pathway Decisions**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement protective actions, based on criteria recommended by current FDA guidance, for the ingestion exposure pathway EPZ (i.e., the area within an approximate 50-mile radius of the NPP). This Sub-element focuses on those actions required for implementation of protective actions.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions. (NUREG-0654/FEMA-REP-1, A.3; C.1, 4; J.11)

Core Capabilities Crosswalk: Operational Coordination**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or by means of drills conducted at any time.

Applicable OROs must demonstrate the capability to secure and use current information on the locations of dairy farms, meat and poultry producers, fisheries, fruit growers, vegetable growers, grain producers, food processing plants, and water supply intake points to implement protective actions within the EPZ. OROs use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts, nuclear insurers) if available. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

N/A

Sub-element 3.e – Implementation of Ingestion Exposure Pathway Decisions (Continued)

Criterion 3.e.2: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production. (NUREG-0654/FEMA-REP-1, G.1, J.9, 11)

Core Capabilities Crosswalk: Public Information and Warning and Operational Coordination**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or by means of drills conducted at any time.

OROs must demonstrate the development of measures and strategies for implementation of ingestion exposure pathway EPZ protective actions by formulating protective action information for the general public and food producers and processors. Demonstration of this criterion includes either pre-distributed public information material in the ingestion exposure pathway EPZ or the capability for rapid reproduction and distribution of appropriate reproduction-ready information and instructions to pre-determined individuals and businesses.

OROs must also demonstrate the capability to control, restrict, or prevent distribution of contaminated food by commercial sectors. Exercise play must include demonstration of communications and coordination among organizations to implement protective actions. Field play of implementation activities may be simulated. For example, communications and coordination with agencies responsible for enforcing food controls within the ingestion exposure pathway EPZ must be demonstrated, but actual communications with food producers and processors may be simulated.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: *N/A*

Sub-element 3.f – Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement plans, procedures, and decisions for post-plume phase *relocation*, *reentry*, and *return*. Implementation of these decisions is essential for protecting the public from direct long-term exposure to deposited radioactive materials from a severe incident at a commercial NPP.

Criterion 3.f.1: Decisions regarding controlled reentry, relocation, and return of individuals during the post-plume phase are coordinated with appropriate organizations and implemented. (NUREG-0654/FEMA-REP-1, E.7; J.10.j; J.12; K.5.b; M.1, 3)

Core Capabilities Crosswalk: Operational Coordination and Critical Transportation**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial, or tabletop exercise, or by means of drills conducted at any time.

Relocation: OROs must demonstrate the capability to coordinate and implement decisions concerning relocation of individuals located in radiologically contaminated areas who were not previously evacuated. Such individuals must be relocated to an area(s) where radiological contamination will not expose the general public to doses that exceed the relocation PAGs. OROs must also demonstrate the capability to provide for short- or long-term relocation of evacuees who lived in an area(s) that has residual radiation levels above the (first-, second-, and 50-year) PAGs.

Areas of consideration must include the capability of OROs to communicate with other OROs regarding timing of actions, notification of the population of procedures for relocation, and notification of, and advice for, evacuated individuals who will be converted to relocation status in situations where they will not be able to return to their homes due to high levels of contamination. OROs must also demonstrate the capability to communicate instructions to the public regarding relocation decisions and intermediate-term housing for relocated persons.

Reentry: OROs must demonstrate the capability to control reentry and exit of individuals who are authorized by the ORO to temporarily reenter the restricted area during the post-plume (i.e., intermediate or late) phase to protect them from unnecessary radiation exposure. OROs must also demonstrate the capability to control exit of vehicles and other equipment to control the spread of contamination outside the restricted area(s). Individuals without specific radiological response missions, such as farmers for animal care, essential utility service personnel, or other members of the public who must reenter an evacuated area during the post-emergency phase must be limited to the lowest radiological exposure commensurate with completing their missions. Monitoring and decontamination facilities will be established as appropriate.

Examples of control procedures are: (1) assignment of, or checking for, direct-reading and permanent record dosimetry for emergency workers; (2) questions regarding the individuals' objective(s), location(s) expected to be visited, and associated timeframes; (3) maps and plots of radiation exposure rates; (4) advice on areas to avoid; (5) procedures for exit, including monitoring of individuals, vehicles, and equipment; (6) decision criteria regarding contamination; (7) proper disposition of emergency worker dosimetry; and (8) maintenance of emergency worker radiation exposure records.

Return: OROs must demonstrate the capability to implement policies concerning return of members of the public to areas that were evacuated during the plume phase. OROs must demonstrate the capability to identify and prioritize services and facilities that require restoration within a few days, and to identify procedures and resources for their restoration. Examples of these services and facilities are medical and social services, utilities, roads, and schools.

Communication among OROs for relocation, reentry, and return may be simulated. All simulated or actual contacts must be documented. These discussions may be accomplished in a group setting.

Sub-element 3.f – Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions (Continued)

OROs must use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts or nuclear insurers) as necessary and if available. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: N/A

ASSESSMENT AREA 4: FIELD MEASUREMENTS AND ANALYSES***Sub-element 4.a – Plume Phase Field Measurements and Analyses*****Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to deploy FMTs with the equipment, methods, and expertise necessary to determine the location of airborne radiation and particulate deposition on the ground from an airborne plume. In addition, NUREG-0654/FEMA-REP-1 indicates that OROs must have the capability to use FMTs within the plume exposure pathway EPZ to detect airborne radioiodine in the presence of noble gases and radioactive particulate material in the airborne plume. In an incident at an NPP, the possible release of radioactive material may pose a risk to the nearby population and environment. Although incident assessment methods are available to project the extent and magnitude of a release, these methods are subject to large uncertainties. During an incident, it is important to collect field radiological data to help characterize any radiological release. Adequate equipment and procedures are essential to such field measurement efforts.

Criterion 4.a.1: [RESERVED]

Criterion 4.a.2: Field teams (2 or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654/FEMA-REP-1, C.1; H.12; I.7, 8, 11; J.10.a)

Core Capabilities Crosswalk: Operational Coordination and Situational Assessment**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise. Other means may include drills that would fully demonstrate technical proficiency.

Responsible OROs must demonstrate the capability to brief FMTs on predicted plume location and direction, plume travel speed, and exposure control procedures before deployment. During an HAB incident, the Field Team management must keep the incident command informed of the field monitoring team's activities and location. Coordination with FMTs and field monitoring may be demonstrated as out-of-sequence demonstrations, as negotiated in the Extent-of-Play Agreement.

Field measurements are needed to help characterize the release and support the adequacy of implemented protective actions, or to be a factor in modifying protective actions. Teams must be directed to take measurements at such locations and times as necessary to provide sufficient information to characterize the plume and its impacts.

If the responsibility for obtaining peak measurements in the plume has been accepted by licensee field monitoring teams, with concurrence from OROs, there is no requirement for these measurements to be repeated by ORO monitoring teams. If the licensee FMTs do not obtain peak measurements in the plume, it is the ORO's decision as to whether peak measurements are necessary to sufficiently characterize the plume. The sharing and coordination of plume measurement information among all FMTs (licensee, Federal, and ORO) is essential.

OROs will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts or the licensee) as necessary. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Air sample cartridges used during the exercise have been specifically designated for drill or exercise use only. These cartridges may be used more than once during the exercise. The actual inventory list will be made available upon request to FEMA, the inventory will be provided out of sequence of the exercise.*

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2. *Enough PPE for each emergency worker should be available for observation by evaluator. Proper use of PPE will be demonstrated through interview and discussion. PPE will not be worn by field teams deployed to public areas.*

**This criterion has been approved for re-demonstration during the exercise.*

Sub-element 4.a – Plume Phase Field Measurements and Analyses (Continued)

Criterion 4.a.3: *Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media. (NUREG-0654/FEMA-REP-1, C.1; H.12: I.8, 9; J.10.a)*

Core Capabilities Crosswalk: NA

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise. Other means may include drills that would fully demonstrate technical proficiency.

Two or more FMTs must demonstrate the capability to make and report measurements of ambient radiation to the field team coordinator, dose assessment team, or other appropriate authority. FMTs must also demonstrate the capability to obtain an air sample for measurement of airborne radioiodine and particulates, and to provide the appropriate authority with field data pertaining to measurement. If samples have radioactivity significantly above background, the authority must consider the need for expedited laboratory analyses of these samples. Coordination concerning transfer of samples, including a chain-of-custody form(s), to a radiological laboratory(ies) must be demonstrated.

OROs must share data in a timely manner with all other appropriate OROs. All methodology, including contamination control, instrumentation, preparation of samples, and a chain-of-custody form(s) for transfer to a laboratory(ies), will be in accordance with the ORO's plans/procedures.

OROs will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts or the licensee) as needed. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Based upon the compressed timeframe of the plume exercise DEEP field monitoring teams will be pre-staged and dispatched from the Millstone EOF*
2. *DEEP will deploy 2 field teams who will determine plume characteristics by field measurements.*
3. *Each DEEP Field Monitoring Team will be dispatched to a minimum of two sampling points where they will take radiation (exposure) measurements and report them to their Field Team Coordinator (FTC). The FTC will direct that air samples (particulate and iodine) be taken at a minimum of 1 location for each field team. Locations to be determined, considering safety.*
4. *If DEEP determines over water sampling points are required per exercise play, the Field Team(s) will be dispatched to the location of the boat, but the launching of the boat will be simulated. Overwater surveys will be taken at the pier.*

**This criterion has been approved for re-demonstration during the exercise.*

Sub-element 4.b – Post-Plume Phase Field Measurements and Sampling**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to assess the actual or potential magnitude and locations of radiological hazards to determine the ingestion exposure pathway EPZ and to support relocation, reentry, and return decisions. This Sub-element focuses on collecting environmental samples for laboratory analyses that are essential for decisions on protecting the public from contaminated food and water and direct radiation from deposited materials.

Criterion 4.b.1: The field teams (2 or more) demonstrate the capability to make appropriate measurements and to collect appropriate samples (e.g., food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision making. (NUREG-0654/FEMA-REP-1, C.1; I.8; J.11)

Core Capabilities Crosswalk: NA

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial or tabletop exercise. Other means may include drills, seminars or training activities that would fully demonstrate technical proficiency.

The ORO's FMTs must demonstrate the capability to take measurements and samples at such times and locations as directed to enable an adequate assessment of the ingestion exposure pathway and to support reentry, relocation, and return decisions. When resources are available, use of aerial surveys and in-situ gamma measurement is appropriate. All methodology, including contamination control, instrumentation, preparation of samples, and chain-of-custody form(s) for transfer to a laboratory(ies), will be in accordance with the ORO's plans/procedures.

The FMTs and/or other sampling personnel must secure ingestion exposure pathway samples from agricultural products and water. Samples in support of relocation and return must be secured from soil, vegetation, and other surfaces in areas that received radioactive ground deposition.

ORO's will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts, the licensee, or nuclear insurers) as needed. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

N/A

Sub-element 4.c – Laboratory Operations**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to perform laboratory analyses of radioactivity in air, liquid, and environmental samples to support protective action decision making.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions. (NUREG-0654/FEMA-REP-1, C.1, 3; J.11)

Core Capabilities Crosswalk: Environmental Response/Health Safety**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial, tabletop exercise, or and actual event. Other means may include drills, seminars or training activities that would fully demonstrate technical proficiency.

The laboratory staff must demonstrate the capability to follow appropriate procedures for receiving samples, including logging information, preventing contamination of the laboratory(ies), preventing buildup of background radiation due to stored samples, preventing cross contamination of samples, preserving samples that may spoil (e.g., milk), and keeping track of sample identity. In addition, the laboratory staff must demonstrate the capability to prepare samples for conducting measurements.

The laboratory(ies) must be appropriately equipped to provide, upon request, timely analyses of media of sufficient quality and sensitivity to support assessments and decisions anticipated in the ORO's plans/procedures. The laboratory instrument calibrations must be traceable to standards provided by the National Institute of Standards and Technology. Laboratory methods used to analyze typical radionuclides released in a reactor incident must be as described in the plans/procedures. New or revised methods may be used to analyze atypical radionuclide releases (e.g., transuranic or as a result of a terrorist incident) or if warranted by incident circumstances. Analysis may require resources beyond those of the ORO.

The laboratory staff must be qualified in radio analytical techniques and contamination control procedures.

ORO's will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts, the licensee, or nuclear insurers) as needed. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: N/A

ASSESSMENT AREA 5: EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Sub-element 5.a- Activation of the Prompt Alert and Notification System

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to provide prompt instructions to the public within the plume exposure pathway EPZ. Specific provisions addressed in this Sub-element are further discussed in Section V, Part A of this Manual, Alert and Notification Systems.

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance. (NUREG-0654/FEMA-REP-1, E.5, 6, 7)

Core Capabilities Crosswalk: Public Information and Warning and Operational Communications

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, drills, or operational testing of equipment that would fully demonstrate capability.

Responsible OROs must demonstrate the capability to sequentially provide an alert signal followed by an initial instructional message to populated areas (permanent resident and transient) throughout the 10-mile plume exposure pathway EPZ. Following the decision to activate the alert and notification system, OROs must complete system activation for primary alert/notification and disseminate the information/instructions in a timely manner. For exercise purposes, timely is defined as “with a sense of urgency and without undue delay.” If message dissemination is identified as not having been accomplished in a timely manner, the evaluator(s) will document a specific delay or cause as to why a message was not considered timely.

Procedures to broadcast the message must be fully demonstrated as they would in an actual emergency up to the point of transmission. Broadcast of the message(s) or test message(s) is not required. The procedures must be demonstrated up to the point of actual activation. The alert signal activation should be simulated, not performed. Evaluations of EAS broadcast stations may also be accomplished through SAVs.

The capability of the primary notification system to broadcast an instructional message on a 24-hour basis must be verified during an interview with appropriate personnel from the primary notification system, including verification of provisions for backup power or an alternate station.

The initial message must include at a minimum the following elements:

- Identification of the ORO responsible and the official with authority for providing the alert signal and instructional message;
- Identification of the commercial NPP and a statement that an emergency exists there;
- Reference to REP-specific emergency information (e.g., brochures, calendars, and/or information in telephone books) for use by the general public during an emergency; and
- A closing statement asking that the affected and potentially affected population stay tuned for additional information, or that the population tune to another station for additional information.

If route alerting is demonstrated as a primary method of alert and notification, it must be done in accordance with the ORO's plans/procedures and the Extent-of-Play Agreement. OROs must demonstrate the capability to accomplish the primary route alerting in a timely manner (not subject to specific time requirements). At least one route needs to be demonstrated and

evaluated. The selected route(s) must vary from exercise to exercise. However, the most difficult route(s) must be demonstrated no less than once every eight years. All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actually broadcast) as negotiated in the extent of play. Actual testing of the mobile public address system will be conducted at an agreed-upon location.

Sub-element 5.a- Activation of the Prompt Alert and Notification System (Continued)

OROs may demonstrate any means of primary alert and notification included in their plans/procedures as negotiated in the Extent-of-Play Agreement.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Activation of the Emergency Alert System (EAS), public alerting sirens, Social Media, Everbridge (ENS), and other means of alerting the public may be simulated.*

Sub-element 5.a- Activation of the Prompt Alert and Notification System (Continued)

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system. (NUREG-0654/FEMA-REP-1, E.6, Appendix 3.B.2.c)

Core Capabilities Crosswalk: Public Information and Warning and Operational Communications

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, drills, or operational testing of equipment that would fully demonstrate capability.

If the exercise scenario calls for failure of any portion of the primary system(s) or if any portion of the primary system(s) actually fails to function during the exercise, OROs must demonstrate backup means of alert and notification. Backup means of alert and notification will differ from facility to facility.

Backup alert and notification procedures that would be implemented in multiple stages must be structured such that the population closest to the plant (e.g., within 2 miles) is alerted and notified first. The populations farther away and downwind of any potential radiological release would be covered sequentially (e.g., 2 to 5 miles, followed by downwind 5 to 10 miles, and finally the remaining population as directed by authorities). Topography, population density, existing ORO resources, and timing will be considered in judging the acceptability of backup means of alert and notification.

Although circumstances may not allow this for all situations, FEMA and the NRC recommend that OROs and operators attempt to establish backup means that will reach those in the plume exposure pathway EPZ within a reasonable time of failure of the primary alert and notification system, with a recommended goal of 45 minutes. The backup alert message must, at a minimum, include (1) a statement that an emergency exists at the plant and (2) instructions regarding where to obtain additional information.

When backup route alerting is demonstrated, regardless of routes being scheduled **only one route needs to be selected and demonstrated** for exercise purposes. All alert and notification activities along the route(s) must be simulated (i.e., the message that would actually be used is read for the evaluator, but not actually broadcast), as negotiated in the extent of play. Actual testing of the mobile public address system will be conducted at an agreed-upon location.

OROs may demonstrate any means of backup alert and notification included in their plans/procedures as negotiated in the Extent-of-Play Agreement.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Route Alerting to be demonstrated in 2022 out of sequence in East Lyme, Lyme, Ledyard.*
2. *Towns not demonstrating route alerting in 2022 will be provided an inject to describe route alerting for one faulted siren.*

Sub-element 5.b – Subsequent Emergency Information and Instructions for the Public and the Media**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to disseminate appropriate emergency information and instructions, including any recommended protective actions, to the public. In addition, NUREG-0654/FEMA-REP-1 requires OROs to ensure that the capability exists for providing information to the media. This includes the availability of a physical location for use by the media during an emergency. NUREG-0654/FEMA-REP-1 also provides that a system must be available for dealing with rumors. This system will hereafter be known as the “public inquiry hotline.”

Criterion 5.b.1: OROs provide accurate subsequent emergency information and instructions to the public and the news media in a timely manner. (NUREG-0654/FEMA-REP-1, E.5, 7; G.3.a, G.4.a, c)

Core Capabilities Crosswalk: Public Information and Warning and Operational Communications**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, or drills.

The responsible ORO personnel/representatives must demonstrate actions to provide emergency information and instructions to the public and media in a timely manner following the initial alert and notification (not subject to specific time requirements). For exercise purposes, timely is defined as “with a sense of urgency and without undue delay.” If message dissemination is identified as not having been accomplished in a timely manner, the evaluator(s) will document a specific delay or cause as to why a message was not considered timely.

Message elements: The ORO must ensure that emergency information and instructions are consistent with PADs made by appropriate officials. The emergency information must contain all necessary and applicable instructions (e.g., evacuation instructions, evacuation routes, reception center locations, what to take when evacuating, shelter-in-place instructions, information concerning protective actions for schools and persons with disabilities and access/functional needs, and public inquiry hotline telephone number) to assist the public in carrying out the PADs provided. The ORO must also be prepared to disclose and explain the ECL of the incident. At a minimum, this information must be included in media briefings and/or media releases. OROs must demonstrate the capability to use language that is clear and understandable to the public within both the plume and ingestion exposure pathway EPZs. This includes demonstration of the capability to use familiar landmarks and boundaries to describe protective action areas.

The emergency information must be all-inclusive by including the four items specified under exercise Demonstration Criterion 5.a.1 and previously identified protective action areas that are still valid, as well as new areas. Information about any rerouting of evacuation routes due to impediments should also be included. The OROs must demonstrate the capability to ensure that emergency information that is no longer valid is rescinded and not repeated by broadcast media. In addition, the OROs must demonstrate the capability to ensure that current emergency information is repeated at pre-established intervals in accordance with the plans/procedures. OROs must demonstrate the capability to develop emergency information in a non-English language when required by the plans/procedures.

If ingestion exposure pathway measures are exercised, OROs must demonstrate that a system exists for rapid dissemination of ingestion exposure pathway information to predetermined individuals and businesses in accordance with the ORO's plans/procedures.

Media information: OROs must demonstrate the capability to provide timely, accurate, concise, and coordinated information to the news media for subsequent dissemination to the public. This would include demonstration of the capability to conduct timely and pertinent media briefings and distribute media releases as the incident warrants. The OROs must demonstrate the

capability to respond appropriately to inquiries from the news media. All information presented in media briefings and releases must be consistent with PADs and other emergency information provided to the public. Copies of pertinent

Sub-element 5.b – Subsequent Emergency Information and Instructions for the Public and the Media (Continued)

emergency information (e.g., EAS messages and media releases) and media information kits must be available for dissemination to the media.

Public inquiry: OROs must demonstrate that an effective system is in place for dealing with calls received via the public inquiry hotline. Hotline staff must demonstrate the capability to provide or obtain accurate information for callers or refer them to an appropriate information source. Information from the hotline staff, including information that corrects false or inaccurate information when trends are noted, must be included, as appropriate, in emergency information provided to the public, media briefings, and/or media releases.

HAB considerations: The dissemination of information dealing with specific aspects of NPP security capabilities, actual or perceived adversarial (terrorist) force or threat, and tactical law enforcement response must be coordinated/communicated with appropriate security authorities (e.g., law enforcement and NPP security agencies) in accordance with ORO plans/procedures.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

1. *Social media simulation products, if used, will be for demonstration purposes only. Public inquiry trends may be injected by simulated social media monitoring injects.*
2. *The role of the 2-1-1 Message Center is to answer calls pertaining to the incident and assist with rumor control. 211 Center is fully participating, call cells will be used to simulate public inquiries.*
3. *Local EOCs will be prompted by inject to refer media inquiries to the state JIC.*
4. *The role of the media will be simulated by Controllers/Actors in the Joint Media Center.*
5. *Traffic impediments are addressed in state media messaging.*

** Approved for re-demonstration: That portion of the evaluation element dealing with “timely manner” and emergency information being all-inclusive. Players should have the opportunity to re-demonstrate the criterion in subsequent messages.*

ASSESSMENT AREA 6: SUPPORT OPERATIONS/FACILITIES

Sub-element 6.a- Monitoring, Decontamination, and Registration of Evacuees

Intent

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement radiological monitoring and decontamination of evacuees, while minimizing contamination of the facility. OROs must also have the capability to identify and register evacuees at reception centers.

Criterion 6.a.1: The reception center facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees. (NUREG-0654/FEMA-REP-1, A.3; C.4; J.10.h; J.12)

Core Capabilities Crosswalk: Environmental Response/Health and Safety and Mass Care Services

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or SAV.

Radiological monitoring, decontamination, and registration facilities for evacuees must be set up and demonstrated as they would be in an actual emergency or as indicated in the Extent-of-Play Agreement. OROs conducting this demonstration must have one-third of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(ies) as necessary to monitor 20 percent of the population within a 12-hour period. This would include adequate space for evacuees' vehicles. Availability of resources can be demonstrated with valid documentation (e.g., MOU/LOA, etc.) reflecting how necessary equipment would be procured for the location. Plans/procedures must indicate provisions for service animals.

Before using monitoring instrument(s), the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation. Staff responsible for the radiological monitoring of evacuees must demonstrate the capability to attain and sustain, within about 12 hours, a monitoring productivity rate per hour needed to monitor the 20 percent EPZ population planning base. The monitoring productivity rate per hour is the number of evacuees that can be monitored, per hour, by the total complement of monitors using an appropriate procedure. For demonstration of monitoring, decontamination, and registration capabilities, a minimum of six evacuees must be monitored per station using equipment and procedures specified in the plans/procedures. The monitoring sequences for the first six simulated evacuees per monitoring team will be timed by the evaluators to determine whether the 12-hour requirement can be met.

ORO's must demonstrate the capability to register evacuees upon completion of the monitoring and decontamination activities. The activities for recording radiological monitoring and, if necessary, decontamination must include establishing a registration record consisting of the evacuee's name, address, results of monitoring, and time of decontamination (if any), or as otherwise designated in the plan and/or procedures. Audio recorders, camcorders, or written records are all acceptable means for registration.

Monitoring activities shall not be simulated. Monitoring personnel must explain use of trigger/action levels for determining the need for decontamination. They must also explain the procedures for referring any evacuees who cannot be adequately decontaminated for assessment and follow-up in accordance with the ORO's plans/procedures. Contamination of the evacuee(s) will be determined by controller inject and not simulated with any low-level radiation source. All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Decontamination of evacuees may be simulated and conducted by interview. Provisions for separate showering and same-sex monitoring must be demonstrated or explained. The staff must demonstrate provisions for limiting the spread of contamination.

Provisions could include floor coverings, signs, and appropriate means (e.g., partitions, roped-off areas) to separate uncontaminated from potentially

Sub-element 6.a- Monitoring, Decontamination, and Registration of Evacuees (Continued)

contaminated areas. Provisions must also exist to separate contaminated and uncontaminated evacuees, provide changes of clothing for those with contaminated clothing and personal belonging to prevent

further contamination of evacuee and facilities. In addition, for any evacuee found to be contaminated, procedures must be discussed concerning handling of potential contamination of vehicles and personal belongings. Waste water from decontamination operations does not need to be collected.

Individuals who have completed monitoring (and decontamination, if needed) must have means (e.g., hand stamp, sticker, bracelet, form, etc.) indicating that they, and their service animals and vehicles, where applicable, have been monitored, cleared, and found to have no contamination or contamination below the trigger/action level.

In accordance with plans/procedures, individuals found to be clean after monitoring do not need to have their vehicle monitored. These individuals do not require confirmation that their vehicle is free from contamination prior to entering the congregate care areas.

However, those individuals who are found to be contaminated and are then decontaminated will have their vehicles held in a secure area or monitored and decontaminated (if applicable) and do require confirmation that their vehicle is free from contamination prior to entering the congregate care areas.

Exercise Specific Extent of Play

N/A

Demonstrated out of sequence during Host Community/Reception Center exercises.

Sub-element 6.b – Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs have the capability to implement radiological monitoring and decontamination of emergency workers and their equipment, inclusive of vehicles.

Criterion 6.b.1: *The facility/ORO has adequate procedures and resources to accomplish monitoring and decontamination of emergency workers and their equipment and vehicles. (NUREG-0654/FEMA-REP-1, K.5.a, b)*

Core Capabilities Crosswalk: Environmental Response/Health and Safety**Assessment/Extent of Play**

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or SAV.

The monitoring staff must demonstrate the capability to monitor emergency worker personnel and their equipment and vehicles for contamination in accordance with the ORO's plans/procedures.

Specific attention must be given to equipment, including any vehicles that were in contact with contamination. The monitoring staff must demonstrate the capability to make decisions on the need for decontamination of personnel, equipment, and vehicles based on trigger/action levels and procedures stated in the ORO plans/procedures. Monitoring of emergency workers does not have to meet the 12-hour requirement. However, appropriate monitoring procedures must be demonstrated for a minimum of two emergency workers and their equipment and vehicles. Before using monitoring instrument(s), the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation.

The area to be used for monitoring and decontamination must be set up as it would be in an actual emergency, with all route markings, instrumentation, record keeping, and contamination control measures in place. Monitoring procedures must be demonstrated for a minimum of one vehicle. It is generally not necessary to monitor the entire surface of vehicles. However, the capability to monitor areas such as radiator grills, bumpers, wheel wells, tires, and door handles must be demonstrated. Interior surfaces of vehicles that were in contact with contaminated individuals must also be checked.

Decontamination of emergency workers may be simulated and conducted via interview. Provisions for separate showering and same-sex monitoring must be demonstrated or explained. The staff must demonstrate provisions for limiting the spread of contamination. Provisions could include floor coverings, signs, and appropriate means (e.g., partitions, roped-off areas) to separate uncontaminated from potentially contaminated areas. Provisions must also exist to separate contaminated and uncontaminated individuals where applicable, provide changes of clothing for those with contaminated clothing, and store contaminated clothing and personal belongings to prevent further contamination of emergency workers or facilities.

ORO's must demonstrate the capability to register emergency workers upon completion of the monitoring and decontamination activities. The activities for recording radiological monitoring and if necessary, decontamination must include establishing a registration record consisting of the emergency worker's name, address, results of the monitoring, and time of decontamination (if any), or as otherwise designated in the plans/procedures. Audio recorders, camcorders, or written records are all acceptable means for registration.

Monitoring activities shall not be simulated. Monitoring personnel must explain use of trigger/action levels for determining the need for decontamination. They must also explain the procedures for referring any emergency workers who cannot be adequately decontaminated for assessment and follow-up in accordance with the ORO's plans/procedures.

Decontamination capabilities and provisions for vehicles and equipment that cannot be successfully decontaminated may be simulated and conducted by interview. Waste water from decontamination operations does not need to be collected.

Sub-element 6.b – Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles (Continued)

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: *N/A*

Demonstrated out of sequence during Host Community/Reception Center exercises.

Sub-element 6.c – Temporary Care of Evacuees**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires OROs to have the capability to establish relocation centers in host/support jurisdictions. The American Red Cross normally provides congregate care in support of OROs under existing letters of agreement.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities. (NUREG-0654/FEMA-REP-1, J.10.h, J.12)

Core Capabilities Crosswalk: Operational Coordination and Mass Care Services

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, drills, an actual event, or SAV.

The evaluator must conduct a walk-through of the center to determine, through observation and inquiries, that the services and accommodations are consistent with applicable guidance.

For planning purposes, OROs must plan for a sufficient number of congregate care centers in host/support jurisdictions based on their all-hazard sheltering experience and what is historically relevant for that particular area. In this simulation, it is not necessary to set up operations as they would be in an actual emergency. Alternatively, capabilities may be demonstrated by setting up stations for various services and providing those services to simulated evacuees. Given the substantial differences between demonstration and simulation of this criterion, exercise demonstration expectations must be clearly specified in Extent-of-Play Agreements.

Congregate care staff must also demonstrate the capability to ensure that evacuees, service animals, and vehicles have been monitored for contamination, decontaminated as appropriate, and registered before entering the facility.

Individuals arriving at congregate care facilities must have means (e.g., hand stamp, sticker, bracelet, form, etc.) indicating that they, and their service animals and vehicles, where applicable, have been placed in a secure area or monitored, cleared, and found to have no contamination or contamination below the trigger/action level.

In accordance with plans/procedures, individuals found to be clean after monitoring do not need to have their vehicle monitored. These individuals do not need confirmation that their vehicle is free from contamination prior to entering the congregate care areas.

However, those individuals who are found to be contaminated and are then decontaminated will have their vehicles held in a secure area until they can be monitored and decontaminated (if applicable) and do need confirmation that their vehicle is being

held in a secure area or free from contamination prior to entering the congregate care areas. This capability may be determined through an interview process.

If operations at the center are demonstrated, material that would be difficult or expensive to transport (e.g., cots, blankets, sundries, and large-scale food supplies) need not be physically available at the facility(ies). However, availability of such items must be verified by providing the evaluator a list of sources with locations and estimates of quantities.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play: *N/A*

Demonstrated out of sequence during Host Community/Reception Center exercises.

Sub-element 6.d – Transportation and Treatment of Contaminated Injured Individuals**Intent**

This Sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that OROs 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/FEMA-REP-1, F.2; H.10; K.5.a, b; L.1, 4)

Core Capabilities Crosswalk: Operational Coordination, Environmental Response/Health and Safety, and Public Health and Medical Services

Assessment/Extent of Play

Assessment of this Demonstration Criterion may be accomplished during a biennial exercise, an actual event, or drills. FEMA has determined that these capabilities have been enhanced and consistently demonstrated as adequate; therefore, offsite medical service drills need be only evaluated biennially. FEMA will, at the request of the ORO, continue to evaluate the drills on an annual basis. All hospitals listed in the plan as medical services hospitals must be evaluated, with a transportation provider, every 2 years. Additional transportation providers will be rotated through the drills in the 8-year exercise cycle. For ambulance providers who do not participate in an evaluated drill during the two year cycle, training will be provided. This training will be documented in the ALC.

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

ORO must demonstrate the capability to monitor/decontaminate and transport contaminated, injured individuals to medical facilities.

An ambulance must be used for response to the victim. However, to avoid taking an ambulance out of service for an extended time, OROs may use any vehicle (e.g., car, truck, or van) to transport the victim to the medical facility. It is allowable for an ambulance to demonstrate up to the point of departure for the medical facility and then have a non-specialized vehicle transport the “victim(s)” to the medical facility. This option is used in areas where removing an ambulance from service to drive a great distance (over an hour) for a drill would not be in the best interests of the community.

Normal communications between the ambulance/dispatcher and the receiving medical facility must 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. In addition, the ambulance crew must 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 or en-route, or may be deferred to the medical facility.

Contaminated injured individuals transported to medical facilities are monitored as soon as possible to assure that everyone (ambulance and medical facility) is aware of the medical and radiological status of the individual(s). However, if an ambulance crew presumes that the patient(s) is contaminated and demonstrates appropriate contamination controls until the patient is monitored. Before using monitoring instruments, the monitor(s) must demonstrate the process of checking the instrument(s) for proper operation. All monitoring activities must be completed as they would be in an actual emergency. Appropriate contamination control measures must be demonstrated before and during transport and at the receiving medical facility.

The medical facility must demonstrate the capability to activate and set up a radiological emergency area for treatment. Medical facilities are expected to have at least one trained physician and one trained nurse to perform and supervise treatment of contaminated injured individuals. Equipment and supplies must be available for treatment of contaminated injured individuals.

Sub-element 6.d – Transportation and Treatment of Contaminated Injured Individuals (Continued)

The medical facility must demonstrate the capability to make decisions upon the need for decontamination of the individual, follow appropriate decontamination procedures, and maintain records of all survey measurements and samples taken. All procedures for collection and analysis of samples and decontamination of the individual must be demonstrated or described to the evaluator. Wastewater from decontamination operations must be handled according to facility plans/procedures.

All activities must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless noted above or otherwise specified in the Extent-of-Play Agreement.

Exercise Specific Extent of Play

Middlesex Hospital will be evaluated out of sequence in 2022. L&M Hospital will participate in an off-year drill in 2022.

Evaluations took place during evaluated MS-1 Exercises for both hospitals in 2021:

- December 10, 2021- Middlesex Hospital
- September 15, 2021 – Lawrence Memorial Hospital

Ambulances used over the past several years:

Year	Middlesex	L&M
2021	Simulated - (Exercise)	Waterford (Exercise)
2020	NA- COVID	NA - COVID
2019	E. Hampton (Training Drill)	New London (Exercise)
2018	Waterford (Exercise)	New London (Training Drill)
2017	Waterford (Training Drill)	New London (Exercise)
2016	Waterford (Exercise)	Waterford (Training Drill)
2015	New London (Training Drill)	Niantic (Exercise)
2014	Waterford (Exercise)	Waterford (Training Drill)
2013	New London (Training Drill)	Waterford (Exercise)
2012	Niantic (Exercise)	Waterford (Training Drill)
2011	Niantic (Training Drill)	New London (Exercise)
2010	Flanders (Exercise)	Waterford (Training Drill)
2009	New London (Training Drill)	Niantic (Exercise)
2008	Waterford (Exercise)	Waterford (Training Drill)
2007	Flanders (Training Drill)	Waterford (Exercise)

