After Action Report

Seabrook Station - NH
Radiological Emergency Preparedness Exercise
Exercise Date: 03/04/2020 Plume Phase 10/1/2020 Ingestion Pathway Phase

Published Date - February1, 2021

FEMA

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Executive Summary

On March 4, 2020 and October1 2020, the U.S. Department of Homeland Security (DHS), Preparedness Directorate, National Preparedness Division, Radiological Emergency Preparedness (REP), Federal Emergency Management Agency (FEMA) Region I conducted exercises in both the 10-Mile Plume and 50-Mile Ingestion Exposure Pathway Emergency Planning Zones around the Seabrook Nuclear Power Station. Interviews and out-of-sequence demonstrations for schools, other special facilities, and reception, monitoring, and decontamination centers (as outlined in this report) were conducted within 60 days of the exercise. The purpose of the exercise and out-of-sequence activities was to 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 (RERP) and procedures. DHS wishes to acknowledge the efforts of the many individuals in the State of New Hampshire, the Commonwealth of Massachusetts, State of Maine, local communities, and private and volunteer organizations that participated in this exercise. Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. Cooperation and teamwork of all the participants were evident during this exercise. This report contains the final evaluation of the biennial exercise and the out-of-sequence activities. The State and local organizations, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were NO Level 1 Findings; NO Level 2 Findings; NO Planning Issues identified as a result of this 2020 Plume/Ingestion Exercises.

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Section 1: Exercise Overview

1.1 Exercise Details

Exercise Name
Seabrook IPX 2020 Exercise

Type of Exercise
Ingestion

Exercises Date
03/04/2020 Plume
10/01/2020 Ingestion

Locations
See the extent-of-play agreements (attached)

Program
United States Department of Homeland Security, Federal Emergency Management Agency, Radiological Emergency Preparedness Program

Mission
Response and Recovery

Scenario Type
Radiological Emergency

1.2 Exercise Planning Team Leadership

Seabrook Station- NEXTERA
Commonwealth of Massachusetts
State of New Hampshire
State of Maine
FEMA Region 1
Federal Monitoring and Assesssment Center

1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Seabrook Station exercise:
1.0 State of New Hampshire 1.1 Brentwood EOC • East Rockingham Amateur Radio Emergency Services (ARES) • Town of Brentwood Board of Selectmen • Town of Brentwood Department of Public Works • Town of Brentwood Fire Department • Town of Brentwood Police Department 1.2 East Kingston • ARES • East Kingston Emergency Management Agency • East Kingston Fire Department • East Kingston Police Department • East Kingston Selectman 1.3 Exeter EOC • Exeter Hospital • Federal Emergency Management Agency (FEMA) • New Hampshire Homeland Security & Emergency Management (HSEM) • Phillips Exeter Academy • Radio Amateur Civil Emergency Service (RACES) • Sau 16 School District • Town of Exeter, Board of Selectmen • Town of Exeter, Emergency Management • Town of Exeter, Emergency Medical Services (EMS) • Town of Exeter, Fire Department • Town of Exeter, IT Department • Town of Exeter, Police Department • Town of Exeter, Public Safety Dispatch Center • Town of Exeter, Public Works • Town of Exeter, Radiation Defense • Town of Exeter, Town Manager • Town of Exeter, Transportation Department 1.4 Greenland EOC • Emergency Management and Staff • Fire Department • Police Department • Department of Public Works 1.5 Hampton EOC • Town of Hampton Department of Health • Town of Hampton Emergency Management • Town of Hampton Emergency Medical Services • Town of Hampton Fire Department • Town of Hampton Police Department • Town of Hampton Public Works Department 1.6 Hampton Falls EOC • Hampton Falls Clerk's Office • Hampton Falls Emergency Management • Hampton Falls Fire Department • Hampton Falls Police Department • Hampton Falls Roads Department • Hampton Falls Selectmen • Hampton Falls Volunteer Fire Department 1.7 IFO Portsmouth • State of New Hampshire HSEM 1.8 Kensington EOC • Kensington Emergency Management Director • Kensington Police Department Chief • Kensington Volunteer Fire Department • School Administration Unit 16 (Kensington Elementary School)
1.9 Kingston EOC • Sanborn Regional School District • Town of Kingston Director of Public Works • Town of Kingston Fire Department • Town of Kingston Health Officer • Town of Kingston Police Department • Town of Kingston Selectmen 1.10 New Castle EOC • New Castle Volunteer Fire Department 1.11 New Hampshire Emergency

Operations Facility (EOF) • New Hampshire Department of HSEM • New Hampshire Division of Public Health Services 1.12 Newfields EOC • ARES • Newfields Emergency Management • Newfields Fire Department • Newfields Police Department 1.13 Newton EOC • ARES • Sanborn Regional School District • Town of Newton Board of Selectmen • Town of Newton Fire Department • Town of Newton Highway Department • Town of Newton Police Department • Town of Newton Town Clerk • Town of Newton Transportation Department 1.14 North Hampton EOC • North Hampton Emergency Management • North Hampton Fire Department • North Hampton Police Department • North Hampton Public Works • Town of North Hampton 1.15 Portsmouth EOC • City of Portsmouth – City Manager and Staff • City of Portsmouth Emergency Management • City of Portsmouth Fire Department • City of Portsmouth Health Department • City of Portsmouth Human Resource Department • City of Portsmouth Police Department • City of Portsmouth Public Works Department • City of Portsmouth School Department • City of Portsmouth Welfare Department • RACES 1.16 Rockingham Dispatch • Rockingham County Dispatch Center/Sheriff's Department 1.17. State Laboratory • 1.17 Rye EOC • Town of Rye Department of Public Works • Town of Rye Fire Department • Town of Rye Municipal Government • Town of Rye Police Department 1.18 Seabrook EOC • Code Enforcement • Communications Officer • Emergency Management Director and Staff • Fire Chief • Police Chief • Public Works • RACES 11 Unclassified Radiological Emergency Preparedness Program (REP) After Action Report/Improvement Plan Seabrook Station • Radiological Defense Officer • School Representative • The Board of Selectmen • Town Manager • Transportation Coordinator 1.19 SEOC • New Hampshire ARES • New Hampshire Bureau of EMS • New Hampshire Department of Administrative Services • New Hampshire Department of Agriculture • New Hampshire Department of Education • New Hampshire Department of Environmental Services • New Hampshire Department of Fish and Game • New Hampshire Department of Health and Human Services • New Hampshire Department of Health and Human Services, Emergency Section Services Unit • New Hampshire Department of Health and Human Services, Radiological Health • New Hampshire Department of Homeland Security and Emergency Management • New Hampshire Department of Information Technology • New Hampshire Department of Resources and Economic Development • New Hampshire Department of Safety, Commissioner's Office • New Hampshire Department of Safety, Division of Fire Safety 2: New Hampshire Department of Transportation • New Hampshire Division of Public Health Services • New Hampshire Governor's Office • New Hampshire HSEM • New Hampshire National Guard • New Hampshire Public Information Officer (PIO) 1.20 South Hampton EOC • Town of South Hampton Board of Selectmen • Town of South Hampton Clerk • Town of South Hampton Department of Public Works • Town of South Hampton Fire Department 1.21 State Police Warning • New Hampshire State Police1.22 Stratham EOC • Highway Agent • NH State EOC – Emergency Medical Services Representative • Stratham Police Department • Stratham Public Health Department • Stratham Selectman • Stratham Volunteer Fire Department • Stratham Volunteers1.24 State Laboratory

2.0 Commonwealth of Massachusetts
2.1 Amesbury EOC • Amesbury Emergency Management Agency • Amesbury Fire Department • Amesbury Police Department • Amesbury Department of Public Works • Amesbury Communications • Amesbury Transportation Coordinator • Amesbury Radiological Officer 2.2 SEOC • American Red Cross • FEMA • Mass 211 • Massachusetts Department of Mental Health • Massachusetts Department of Public Health • Massachusetts Department of Transportation • Massachusetts Emergency Management Agency (MEMA) • Massachusetts Executive Office of Public Safety and Security • Massachusetts National Guard • Massachusetts State Police • Seabrook Station Nuclear Power Plant 2.3 FMT #1 • Massachusetts Department of Health Radiation Control Program2.4 FMT #2 • Massachusetts Department of Health Radiation Control Program 2.5 MA 211 • N/a 2.6 MEMA Region I • Massachusetts Emergency Management Agency (MEMA Region I) • American Red Cross • Massachusetts Department of Mental Health • MA National Guard (MANG) • Massachusetts State Police (MSP) 2.7 Merrimac EOC • Merrimac Emergency Management • Merrimac Fire Department • Merrimac Police Department • Merrimac Public Works Department2.8 Newbury EOC • Newbury Fire Department • Newbury Highway Department • Newbury Police Department 2.9 Newburyport EOC • Newburyport Fire Department • Newburyport Police Department • Newburyport Harbormaster • Newburyport Department of Public Works • Newburyport Department of Health • Newburyport School District 2.10 Salisbury EOC • Salisbury Board of Selectman • Salisbury Department Of Public Works • Salisbury Emergency Management Agency • Salisbury Fire Department • Salisbury Police Department 2.11 West Newbury EOC • Town of West Newbury Bureau of Health • Town of West Newbury Department of Public Works• Town of West Newbury Emergency Management Agency • Town of West Newbury Fire Department • Town of West Newbury Municipal Official (acting) • Town of West Newbury Police Department • Town of West Newbury Highway Department • Town of West Newbury Council on Aging. State Laboratory

State of Maine
State Emergency Operations Center
Maine Emergency Management Agency
Maine Radiological Control Program - DHHS
Maine State Police
Maine DOT
Maine National Guard
Maine Department of Agricultural Resources
Maine Department of Environmental Protection
Maine Department of Inland Fisheries and Wildlife
American Red Cross
Federal Emergency Management Agency Region I
NextEra Energy Seabrook Station Liaison
Maine 211 Call Center

NH State EOC
Maine Emergency Management Agency Liaison

York County EOC
YCEMA EMA
YCEMA Liaison to NHDES on Pease

Radiological Field Monitoring and Sampling Teams
Maine Department of Health and Human Services/Radiation Control Program
State Labratory

Joint Information Center
Maine Emergency Management Agency
York County EMA

Risk Jurisdictions
York County EMA

Section 2: Exercise Design Summary

2.1 Exercise Purpose and Design

FEMA Region I evaluated exercises on March 4 and October 1 2020, 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 Seabrook Nuclear Power Station. 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 in the HSEEP format.

2.2 Exercise Scenario

Radiological Emergency Plume and Ingestion Pathway

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 03/04/2020 Plume and 10/01/2020 Ingestion, Seabrook IPX 2020 Exercise.

Each jurisdiction and functional entity was evaluated based on the demonstration of core capabilities, capability targets, critical tasks, and the underlying Radiological Emergency Preparedness criteria as delineated in the Federal Emergency Management Agency Radiological Emergency Preparedness Program Manual dated January 2016. Exercise criteria are listed by number, and the demonstration status of those criteria are indicated by the use of the following terms:

- Met (M): No Findings assessed and no unresolved Findings from prior exercises.
- Level 1 (L1) Finding: An observed or identified inadequacy of organizational performance in an exercise 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 Nuclear Power Plant (NPP).
- Level 2 (L2) Finding: An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety.
- Plan (P) Issue: An observed or identified inadequacy in the offsite response organizations' (ORO's) emergency plan/implementing procedures, rather than that of the ORO's performance.
- N: Not demonstrated

3.2 Summary Results of Exercise Evaluation

DATE: Various SITE: Seabrook Station - NH M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated	Mobilizatroin	Facilities	Direction and Control	Communications Equipment	Equipment and Supplies to Support Operations
Emergency Operations Management	1a1	1b1	1c1	1d1	1e1
Stratham Circle Learning Center - School - Child Care	M				
The SRHS & SRMS Campus - School - Child Care	M				
Saint Patrick Academy - School - Child Care	M				
Sacred Heart School - School - Child Care	M				
Robert J. Lister Academy - School - Child Care	M				
Oceanside Nursing Home - Adult Care Facility	M				
KinderCare Learning Cente - School - Child Care	M				
Great Bay Kid's Company - School - Child Care	M				
Fair Weather Lodge - Adult Care Facility	M				
Discovery Child Enrichment Center - School - Child Care	M				
Cornerstone at Hampton - Adult Care Facility	M				
Cooperative Middle School - School - Child Care	M				
The Children's Garden - School - Child Care	M				
Building Block Commons - School - Child Care	M				
All American Assisted Living - Adult Care Facility	M				
York County (Maine) Local EOC - Local EOC	M		M	M	M
Maine State Emergency Operations Center - State EOC	M		M	M	M
ME State Lab - State Laboratory					M
MA State Lab – State Laboratory					M
NH State Lab – State Laboratory					M
Newbury Local EOC - Local EOC	M		M	M	M
West Newbury Local EOC - Local EOC	M		M	M	M
Salisbury Local EOC - Local EOC	M		M	M	M
Newburyport Local EOC - Local EOC	M	M	M	M	M
Amesbury Local EOC - Local EOC	M		M	M	M
Merrimac Local EOC - Local EOC	M	M	M	M	M
Massachusetts State Emergency Operations Center - State EOC	M		M	M	M
MA MEMA Region I - Regional SEOC	M		M	M	M
NH (SS) Field Monitoring Team #2 - Field Monitoring Team	M			M	M
NH (SS) Field Monitoring Team #1 - Field Monitoring Team	M			M	M
MA (SS) Field Monitoring Team #2 - Field Monitoring Team	M			M	M
MA (SS) Field Monitoring Team #1 - Field Monitoring Team	M			M	M
Stratham Local EOC - Local EOC	M		M	M	M
South Hampton Local EOC - Local EOC	M		M	M	M
Rye Local EOC - Local EOC	M		M	M	M
Portsmouth Local EOC - Local EOC	M		M	M	M
North Hampton Local EOC - Local EOC	M		M	M	M

Newton Local EOC - Local EOC	M	M	M	M	M
Newfield's Local EOC - Local EOC	M		M	M	M
New Castle Local EOC - Local EOC	M		M	M	M
Kingston Local EOC - Local EOC	M		M	M	M
Kensington Local EOC - Local EOC	M	M	M	M	M
Hampton Local EOC - Local EOC	M		M	M	M
Hampton Falls Local EOC - Local EOC	M		M	M	M
Greenland Local EOC - Local EOC	M		M	M	M
Exeter Local EOC - Local EOC	M		M	M	M
East Kingstown Local EOC - Local EOC	M		M	M	M
Brentwood Local EOC - Local EOC	M		M	M	M
MA 211 Call Center - MA 211 Center				M	M
New Hampshire State Emergency Operations Center - State EOC	M		M	M	M
Seabrook Local EOC - Local EOC	M		M	M	M
NH Incident Field Office - Incident Field Office	M		M	M	M
ME (SS) Sampling Team #2 - Field Sampling Team				M	M
ME (SS) Sampling Team #1 - Field Sampling Team				M	M
MA (SS) Sampling Team #1 - Field Sampling Team				M	M
NH (SS) Sampling Team – Field Sampling Team				M	M
MA (SS) Emergency Operations Facility - Emergency Operations Facility	M		M	M	M
NH (SS) Emergency Operations Facility - Emergency Operations Facility	M		M	M	M
MA (SS) Joint Information Center - Joint Information Center	M		M	M	M
NH (SS) Joint Information Center - Joint Information Center	M		M	M	M
New Hampshire State Police Warning Point - Warning Point	M			M	M
New Hampshire Rockingham County Dispatch - Siren Activation Point	M			M	M

DATE: Various SITE: Seabrook Station - NH M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated	Emergency Worker Exposure Control	Dose Assessment & PARs & PADs for the Emergency Event		PADs for the Protection of persons with disabilities and access/functional needs	Radiological Assessment and Decision-making for the Ingestion Exposure Pathway	Radiological Assessment & Decision-making Concerning Post-Plume Phase Relocation, Reentry, and Return
Protective Action Decision-Making	2a1	2b1	2b2	2c1	2d1	2e1
Maine State Emergency Operations Center - State EOC	M	M	M	M	M	M
Massachusetts State Emergency Operations Center - State EOC	M	M	M	M	M	M
New Hampshire State Emergency Operations Center - State EOC	M	M	M	M	M	M
MA (SS) Emergency Operations Facility - Emergency	M	M	M			
NH (SS) Emergency Operations Facility - Emergency Operations	M	M	M			

DATE: Various SITE: Seabrook Station - NH M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated	Implementation of Emergency Worker Exposure Control	Implementation of KI Decision for Institutionalized Individuals and the Public	Implementation of Protective Actions for persons with disabilities and access/functional needs		Implementation of Traffic and Access Control		Implementation of Ingestion Exposure Pathway Decisions		Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions
Protective Action Implementation	3a1	3b1	3c1	3c2	3d1	3d2	3e1	3e2	3f1
Stratham Circle Learning Center - School - Child Care		M		M					
The SRHS & SRMS Campus - School - Child Care		M		M					
Saint Patrick Academy - School - Child Care		M		M					
Sacred Heart School - School - Child Care		M		M					
Robert J. Lister Academy - School - Child Care		M		M					
Oceanside Nursing Home - Adult Care Facility		M	M						
KinderCare Learning Cente - School - Child Care		M		M					
Great Bay Kid's Company - School - Child Care		M		M					
Fair Weather Lodge - Adult Care Facility		M	M						
Discovery Child Enrichment Center - School - Child Care		M		M					
Cornerstone at Hampton - Adult Care Facility		M	M						
Cooperative Middle School - School - Child Care		M		M					
The Children's Garden - School - Child Care		M		M					
Building Block Commons - School - Child Care		M		M					
All American Assisted Living - Adult Care Facility		M	M						
York County (Maine) Local EOC - Local EOC	M	M			M	M			
Maine State Emergency Operations Center - State EOC							M	M	
ME State Lab - State Laboratory	M								
MA State Lab – State Laboratory	M								
NH State Lab – State Laboratory	M								
Newbury Local EOC - Local EOC	M		M	M	M	M			
West Newbury Local EOC - Local EOC	M		M	M	M	M			
Salisbury Local EOC - Local EOC	M		M	M	M	M			
Newburyport Local EOC - Local EOC	M		M	M	M	M			
Amesbury Local EOC - Local EOC	M		M	M	M	M			
Merrimac Local EOC - Local EOC	M		M	M	M	M			
Massachusetts State Emergency Operations Center - State			M	M	M	M	M	M	M
MA MEMA Region I - Regional SEOC			M	M	M	M			
NH (SS) Field Monitoring Team #2 - Field Monitoring	M								
NH (SS) Field Monitoring Team #1 - Field Monitoring	M								
MA (SS) Field Monitoring Team #2 - Field Monitoring	M								
MA (SS) Field Monitoring Team #1 - Field Monitoring	M								
Stratham Local EOC - Local EOC	M	M	M	M	M	M			
South Hampton Local EOC - Local EOC	M	M	M	M	M	M			
Rye Local EOC - Local EOC	M	M	M	M	M	M			
Portsmouth Local EOC - Local EOC	M	M	M	M	M	M			
North Hampton Local EOC - Local EOC	M	M	M	M	M	M			
Newton Local EOC - Local EOC	M	M	M	M	M	M			

Newfield's Local EOC - Local EOC	M	M	M	M	M	M			
New Castle Local EOC - Local EOC	M	M	M	M	M	M			
Kingston Local EOC - Local EOC	M	M	M	M	M	M			
Kensington Local EOC - Local EOC	M	M	M	M	M	M			
Hampton Local EOC - Local EOC	M	M	M	M	M	M			
Hampton Falls Local EOC - Local EOC	M	M	M	M	M	M			
Greenland Local EOC - Local EOC	M	M	M	M	M	M			
Exeter Local EOC - Local EOC	M	M	M	M	M	M			
East Kingstown Local EOC - Local EOC	M	M	M	M	M	M			
Brentwood Local EOC - Local EOC	M	M	M	M	M	M			
New Hampshire State Emergency Operations Center -	Click				M	M	M	M	M
Seabrook Local EOC - Local EOC	M	M	M	M	M	M			
NH Incident Field Office - Incident Field Office	M								
ME (SS) Sampling Team #2 - Field Sampling Team	M								
ME (SS) Sampling Team #1 - Field Sampling Team	M								
MA (SS) Sampling Team #1 - Field Sampling Team	M								
NH (SS) Sampling Team #1– Field Sampling Team	M								
MA (SS) Emergency Operations Facility - Emergency	M								
NH (SS) Emergency Operations Facility - Emergency	M								

DATE: Various SITE: Seabrook Station - NH M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated	Plume Phase Field Measurement and Analyses			Post Plume Phase Field Measurements and Sampling	Laboratory Operations
Field Measurements and Analyses	4a1	4a2	4a3	4b1	4c1
ME State Lab - State Laboratory					M
MA State Lab – State Laboratory					M
NH State Lab – State Laboratory					M
NH (SS) Field Monitoring Team #2 - Field Monitoring Team			M		
NH (SS) Field Monitoring Team #1 - Field Monitoring Team			M		
MA (SS) Field Monitoring Team #2 - Field Monitoring Team			M		
MA (SS) Field Monitoring Team #1 - Field Monitoring Team			M		
ME (SS) Sampling Team #2 - Field Sampling Team				M	
ME (SS) Sampling Team #1 - Field Sampling Team				M	
MA (SS) Sampling Team #1 - Field Sampling Team				M	
NH (SS) Sampling Team #1 - Field Sampling Team				M	
MA (SS) Emergency Operations Facility - Emergency Operations Facility		M			
NH (SS) Emergency Operations Facility - Emergency Operations Facility		M			

DATE: Various SITE: Seabrook Station - NH M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated	Activation of the Prompt Alert and Notification System				. Emergency Information and Instructions for the Public and the Media
Emergency Notification and Public Information	5a1	5a2	5a3	5a4	5b1
York County (Maine) Local EOC - Local EOC					M
Maine State Emergency Operations Center - State EOC	M				M
Newbury Local EOC - Local EOC					M
West Newbury Local EOC - Local EOC					M
Salisbury Local EOC - Local EOC					M
Newburyport Local EOC - Local EOC					M
Amesbury Local EOC - Local EOC					M
Merrimac Local EOC - Local EOC					M
Massachusetts State Emergency Operations Center - State EOC	M				M
Stratham Local EOC - Local EOC					M
South Hampton Local EOC - Local EOC					M
Rye Local EOC - Local EOC					M
Portsmouth Local EOC - Local EOC					M
North Hampton Local EOC - Local EOC					M
Newton Local EOC - Local EOC					M
Newfield's Local EOC - Local EOC					M
New Castle Local EOC - Local EOC					M
Kingston Local EOC - Local EOC					M
Kensington Local EOC - Local EOC					M
Hampton Local EOC - Local EOC					M
Hampton Falls Local EOC - Local EOC					M
Greenland Local EOC - Local EOC					M
Exeter Local EOC - Local EOC					M
East Kingstown Local EOC - Local EOC					M
Brentwood Local EOC - Local EOC					M
MA 211 Call Center - MA 211 Center					M
New Hampshire State Emergency Operations Center - State EOC	M				M
Seabrook Local EOC - Local EOC					M
NH Incident Field Office - Incident Field Office					M
MA (SS) Joint Information Center - Joint Information Center					M
NH (SS) Joint Information Center - Joint Information Center					M
New Hampshire Rockingham County Dispatch - Siren Activation Point	M				

3.2.1 Stratham Circle Learning Center - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 The SRHS & SRMS Campus - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Saint Patrick Academy - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Sacred Heart School - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Robert J. Lister Academy - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Oceanside Nursing Home - Adult Care Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 KinderCare Learning Center - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Great Bay Kid's Company - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings - Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 Fair Weather Lodge - Adult Care Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings - Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 Discovery Child Enrichment Center - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for

this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Cornerstone at Hampton - Adult Care Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Cooperative Middle School - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings - Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 The Children's Garden - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings - Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 Building Block Commons - School - Child Care

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 All American Assisted Living - Adult Care Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 3.b.1, 3.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 York County (Maine) Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following

activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Maine State Emergency Operations Center - State EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.d.1, 3.b.1, 3.e.1, 3.e.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 ME State Lab - State Laboratory

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.e.1, 3.a.1, 4.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Newbury Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

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

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 West Newbury Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

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

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Salisbury Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

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

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Newburyport Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response
In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.b.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.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Amesbury Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

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

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Merrimac Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.b.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.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Massachusetts State Emergency Operations Center - State EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
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, 2.d.1, 2.e.1, 3.d.1, 3.d.2, 3.e.1, 3.e.2, 3.f.1, 5.a.1, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 MA MEMA Region I - Regional SEOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 NH (SS) Field Monitoring Team #2 - Field Monitoring Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 NH (SS) Field Monitoring Team #1 - Field Monitoring Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 MA (SS) Field Monitoring Team #2 - Field Monitoring Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 MA (SS) Field Monitoring Team #1 - Field Monitoring Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 Stratham Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following

activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 South Hampton Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Rye Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1..

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Portsmouth Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 North Hampton Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Newton Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Newfield's Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 New Castle Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Kingston Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Kensington Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Hampton Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Hampton Falls Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Greenland Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Exeter Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

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

MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 East Kingstown Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Brentwood Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance

Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 MA 211 Call Center - MA 211 Center

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 New Hampshire State Emergency Operations Center - State EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
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, 2.d.1, 2.e.1, 3.d.1, 3.d.2, 3.e.1, 3.e.2, 3.f.1, 5.a.1, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Seabrook Local EOC - Local EOC

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 NH Incident Field Office - Incident Field Office

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 ME (SS) Sampling Team #2 - Field Sampling Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1, 3.a.1, 4.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 ME (SS) Sampling Team #1 - Field Sampling Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1, 3.a.1, 4.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 MA (SS) Sampling Team #1 - Field Sampling Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1, 3.a.1, 4.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 MA (SS) Emergency Operations Facility - Emergency Operations Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 3.a.1, 4.a.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 NH (SS) Emergency Operations Facility - Emergency Operations Facility

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 3.a.1, 4.a.2.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 MA (SS) Joint Information Center - Joint Information Center

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 NH (SS) Joint Information Center - Joint Information Center

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 New Hampshire State Police Warning Point - Warning Point

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1.

a. **Level 1 Finding:** None

b. **Level 2 Finding:** None

c. **Plan Issues:** None

d. **Not Demonstrated:** None

e. **Prior Level 2 Findings – Resolved:** None

f. **Prior Level 2 Findings - Unresolved:** None

3.2.1 New Hampshire Rockingham County Dispatch - Siren Activation Point

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.a.1, 1.d.1, 1.e.1, 5.a.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 Commnonwealth of Massachusetts - State Labortory

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 3.a.1, 4.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 New Hampshire - State Labortory

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 3.a.1, 4.c.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings - Resolved: None

f. Prior Level 2 Findings - Unresolved: None

3.2.1 New Hampshire (SS) Sampling Team - Field Sampling Team

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, Out of Sequence Events, and the COVID-19 Response.

In summary, the status of DHS/FEMA Radiological Emergency Preparedness criteria for this location is as follows:
MET: 1.d.1, 1.e.1, 3.a.1, 4.b.1.

a. Level 1 Finding: None

b. Level 2 Finding: None

c. Plan Issues: None

d. Not Demonstrated: None

e. Prior Level 2 Findings – Resolved: None

f. Prior Level 2 Findings - Unresolved: None

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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 Findings; NO Level 2 Findings and NO Planning Issues identified as a result of the 2020 Seabrook Station evaluated Plume and Ingestion Pathway Exercises.

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Appendix A: Exercise Timeline

N/A

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Appendix B: Exercise Key Leaders and Evaluators

Regional Assistance Committee (RAC) Chair: John McGough

Senior Site Specialist: John Rice, Site Specialist: Barbara Thomas

Location / Venue	Evaluation Team	Core Capabilities
Stratham Circle Learning Center - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
The SRHS & SRMS Campus - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Saint Patrick Academy - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Sacred Heart School - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response -

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		Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Robert J. Lister Academy - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Oceanside Nursing Home - Adult Care Facility	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
KinderCare Learning Cente - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Great Bay Kid's Company - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Fair Weather Lodge - Adult Care Facility	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection -

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		Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Discovery Child Enrichment Center - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Cornerstone at Hampton - Adult Care Facility	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Cooperative Middle School - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
The Children's Garden - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications,

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		Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
Building Block Commons - School - Child Care	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
All American Assisted Living - Adult Care Facility	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Operational Communications, Response - Operational Coordination, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning
York County (Maine) Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Maine State Emergency Operations Center - State EOC	Barbara Thomas, Mario Vigliani, Kent Tosch, Richard Watts	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response -

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		Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
ME State Lab - State Laboratory	Kent Tosch	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
Newbury Local EOC - Local EOC	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
West Newbury Local EOC - Local EOC	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Salisbury Local EOC - Local EOC	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and

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		Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Newburyport Local EOC - Local EOC	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Amesbury Local EOC - Local EOC	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Merrimac Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response -

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		Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Massachusetts State Emergency Operations Center - State EOC	John Rice, Miriam Weston, Ingrid Pierce, Joseph Lischinsky	Prevention - Intelligence and Information Sharing, Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Intelligence and Information Sharing, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Economic Recovery, Recovery - Health and Social Services, Recovery - Housing, Recovery - Natural and Cultural Resources, Recovery - Operational Coordination, Recovery - Public Information and Warning
MA MEMA Region I - Regional SEOC	John Rice	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
NH (SS) Field Monitoring Team #2 - Field Monitoring Team	Cheryl Weaver	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination

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NH (SS) Field Monitoring Team #1 - Field Monitoring Team	Marcy Campbell	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
MA (SS) Field Monitoring Team #2 - Field Monitoring Team	Mario Vigliani	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
MA (SS) Field Monitoring Team #1 - Field Monitoring Team	Deborah Blunt	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
Stratham Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
South Hampton Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services,

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		Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Rye Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Portsmouth Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
North Hampton Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public

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		Information and Warning
Newton Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Newfield's Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
New Castle Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Kingston Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection -

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		Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Kensington Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Hampton Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Hampton Falls Local EOC - Local EOC	John Rice	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and

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		Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Greenland Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Exeter Local EOC - Local EOC	John Rice	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
East Kingstown Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response

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		- Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
Brentwood Local EOC - Local EOC	John Rice	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
MA 211 Call Center - MA 211 Center	Barbara Thomas	Prevention - Public Information and Warning, Protection - Public Information and Warning, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Recovery - Public Information and Warning
New Hampshire State Emergency Operations Center - State EOC	Barbara Thomas, Taneeka Hollins, Michele Sturman, Helen LaForge	Prevention - Intelligence and Information Sharing, Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Intelligence and Information Sharing, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Economic Recovery, Recovery - Health and Social

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		Services, Recovery - Housing, Recovery - Natural and Cultural Resources, Recovery - Operational Coordination, Recovery - Public Information and Warning
Seabrook Local EOC - Local EOC	John Rice, Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Critical Transportation, Response - Environmental Response/Health and Safety, Response - Infrastructure Systems, Response - Mass Care Services, Response - On-scene Security, Protection, and Law Enforcement, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
NH Incident Field Office - Incident Field Office	John Rice	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
ME (SS) Sampling Team #2 - Field Sampling Team	Kent Tosch	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
ME (SS) Sampling Team #1 - Field Sampling Team	Kent Tosch	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
MA (SS) Sampling Team #1 - Field	Joseph Lischinsky	Prevention - Operational Coordination, Protection - Operational Coordination, Mitigation - Operational

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Sampling Team		Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Recovery - Operational Coordination
MA (SS) Emergency Operations Facility - Emergency Operations Facility	Barbara Thomas	Prevention - Intelligence and Information Sharing, Prevention - Operational Coordination, Protection - Intelligence and Information Sharing, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Situational Assessment, Recovery - Operational Coordination
NH (SS) Emergency Operations Facility - Emergency Operations Facility	John Rice	Prevention - Intelligence and Information Sharing, Prevention - Operational Coordination, Protection - Intelligence and Information Sharing, Protection - Operational Coordination, Mitigation - Operational Coordination, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Situational Assessment, Recovery - Operational Coordination
MA (SS) Joint Information Center - Joint Information Center	John Rice, Ingrid Pierce	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment, Recovery - Operational Coordination, Recovery - Public Information and Warning
NH (SS) Joint Information Center - Joint Information Center	Barbara Thomas, Helen LaForge	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Response - Situational Assessment,

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		Recovery - Operational Coordination, Recovery - Public Information and Warning
New Hampshire State Police Warning Point - Warning Point	John Rice, Helen LaForge	Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Public Health, Healthcare, and Emergency Medical Services
New Hampshire Rockingham County Dispatch - Siren Activation Point	Barbara Thomas	Prevention - Operational Coordination, Prevention - Public Information and Warning, Protection - Operational Coordination, Protection - Public Information and Warning, Mitigation - Operational Coordination, Mitigation - Public Information and Warning, Response - Environmental Response/Health and Safety, Response - Mass Care Services, Response - Operational Communications, Response - Operational Coordination, Response - Public Health, Healthcare, and Emergency Medical Services, Response - Public Information and Warning, Recovery - Operational Coordination, Recovery - Public Information and Warning

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Appendix C: Extent of Play Agreements

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NEW HAMPSHIRE
STATE EMERGENCY
OPERATIONS CENTER

SEABROOK STATION INGESTION PATHWAY EXERCISE EXTENT OF PLAY AGREEMENT (XPA) v3

2020

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Background

This is the 2020 Extent of Play Agreement (XPA) for the New Hampshire (NH) Off-Site Response Organization (ORO) involved in the Plume and Ingestion Pathway Exercise (IPX) Cycle for Seabrook Station. No changes have been made to any criterion except as noted in this document.

This XPA covers all components and activities of the exercise cycle starting with a plume workshop, a recovery based seminar, a Tabletop Exercise (TTX), two Combined Functional Exercises (CFE), and culminating with an evaluated exercise. Various out-of-sequence activities and exercises will be scheduled, but the criteria utilized will be incorporated within this Extent of Play and noted throughout the document, as appropriate.

This document does not identify all exercise areas to be discussed/exercised by the state and other off-site response organizations/agencies. The scenarios developed for and utilized in the drills and exercises will incorporate sufficient injects to provide opportunities for all players to participate in response and recovery activities mindful of an all-hazard approach. Items identified in this XPA only will be subject to evaluation.

This is a NEW HAMPSHIRE ONLY document. The XPA's for Maine and Massachusetts will be combined with this document by FEMA to form a comprehensive Extent of Play for this exercise cycle.

Version 3 – updated for changes made to drill cycle due to COVID-19

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Calendar and Players

	DATE	LOCATION(S)	PARTICIPANTS	STATUS
WORKSHOP	**Wednesday November 6, 2019 8:30 am – 4pm**	DES, Bldg 222 Newington, NH	NH Local EPZ/Host EOC personnel; NH SEOC; JIC; RIMC; DPHS/Rad Health; RHTA; Accident Assessment; Lab; EOF; FEMA Region I; FRMAC; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	Discussion-based Non-evaluated
RECOVERY	**Wednesday January 15, 2020 8:30 am – 4pm**	DES, Bldg 222 Newington, NH	NH SEOC; JIC; RIMC; DPHS/Rad Health; RHTA; Accident Assessment; Lab; EOF; FEMA Region I; FRMAC; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	Discussion-based Non-evaluated
TABLETOP	**Wednesday February 5, 2020 8:30 am– 4 p.m.**	UNH – Holloway Commons Durham, NH	NH Local EPZ/Host EOC personnel; NH SEOC; JIC; RIMC; DPHS/Rad Health; RHTA; Accident Assessment; Lab; EOF; FEMA Region I; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	Discussion-based Non-evaluated
CFE #1 – DAY ONE	**Wednesday March 4, 2020**	NH Incident Planning and Operations Center, Local EOCs, IFO/EOF, JIC, Field Monitoring Team locations	NH Local EPZ/Host EOC; NH SEOC; JIC; DPHS/Rad Health; RHTA; Accident Assessment; IFO; EOF; FEMA R1; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	Exercise Non-evaluated
CFE #1 – DAY TWO	**Thursday March 5, 2020**	NH National Guard 722 Riverwood Ave Pembroke, NH	NH SEOC; JIC; DPHS/Rad Health; RHTA; Accident Assessment; FEMA R1; FRMAC; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	TTX Exercise Non-evaluated
CFE #2 – DAY ONE	**Wednesday September 30, 2020**	29 Hazen Drive Concord, NH	DPHS/Rad Health; Accident Assessment; FEMA R1; Seabrook Station;	Exercise Non-evaluated
CFE #2 – DAY TWO	**Thursday October 1, 2020**	108 Corporate Drive Portsmouth, NH	NH SEOC; JIC; DPHS/Rad Health; RHTA; Accident Assessment; FEMA R1; FRMAC; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	TTX Exercise Non-evaluated
EVALUATED DAY	**Tuesday December 8, 2020**	29 Hazen Drive Concord, NH	DPHS/Rad Health; Accident Assessment; FEMA R1; Seabrook Station;	**EVALUATED**
EVALUATED DAY	**Wednesday December 9, 2020**	108 Corporate Drive Portsmouth, NH	NH SEOC; JIC; DPHS/Rad Health; RHTA; Accident Assessment; FEMA R1; FRMAC; Seabrook Station; Monitoring/Sampling Teams, MA SEOC, ME SEOC	**EVALUATED**

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Facilities

The following organizations/locations will demonstrate in 2020:

In Sequence:

State Emergency Operations Center (SEOC): NH Incident Planning and Operations Center
Emergency Operations Facility (EOF): NH Division of Public Health Services Radiological Health Section, working remotely from 29 Hazen Drive, Concord
State Police Communications: State Warning Point
Public Inquiry: Community Outreach Office at NH IPOC
Joint Information Center: Working remotely at NH SEOC.
Dose Assessment Personnel and Monitoring Team Coordinator (MTC): Working remotely from 29 Hazen Drive, Concord

Out of Sequence:

Local EPZs: Brentwood, East Kingston, Exeter, Greenland, Hampton, Hampton Falls, Kensington, Kingston, New Castle, Newfields, Newton, North Hampton, Portsmouth, Rye, Seabrook, South Hampton, Stratham

Licensed Child Care Facilities:	Remote Demonstration
Nursing/Long-Term Care Facility:	Remote Demonstration
M-S1 Hospital:	Wentworth-Douglass Hospital, Dover
NH State Radiological Lab: (DPHS)	29 Hazen Drive, Concord
Field Monitoring Teams	29 Hazen Drive, Concord
Sampling Teams	29 Hazen Drive, Concord

Note: Due to the length of time from the submission of this Extent of Play and the Evaluated Exercise, some of the Special Facilities may be removed or adjusted.

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Evaluation Criteria

The below core capabilities will be demonstrated through REP Assessment Areas during the 2020 drill cycle.

Common
- Public Information and Warning
- Operational Coordination

Prevention
- Intelligence and Information Sharing

Protection
- Intelligence and Information Sharing

Response
- Critical Transportation
- Environmental Response/Health and Safety
- Infrastructure Systems
- Mass Care Services
- On-Scene Security and Prevention
- Operational Communications
- Public and Private Services and Resources
- Public Health and Medical Services
- Situational Assessment

Recovery
- Economic Recovery
- Health and Social Services
- Housing
- Natural and Cultural Resources

The Assessment Areas with each sub-element and associated demonstration criteria for the 2020 Drill Cycle are listed below.

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Assessment Area	2020 Cycle
Assessment Area 1: Emergency Operations Management	
SUB-ELEMENT 1.a - Mobilization	
Criterion 1.a.1	X
SUB-ELEMENT 1.b – Facilities	
Criterion 1.b.1	X
SUB-ELEMENT 1.c – Direction and Control	
Criterion 1.c.1	X
SUB-ELEMENT 1.d – Communications Equipment	
Criterion 1.d.1	X
SUB-ELEMENT 1.e – Equipment and Supplies to Support Operations	
Criterion 1.e.1	X
Assessment Area 2: Protective Action Decision-Making	
SUB-ELEMENT 2.a – Emergency Worker Exposure Control	
Criterion 2.a.1	X
SUB-ELEMENT 2.b – Dose Assessment, PARs, and PADs for the Emergency Event	
Criterion 2.b.1	X
Criterion 2.b.2	X
SUB-ELEMENT 2.c – PADs Consideration or the Protection of Persons with Disabilities and Access/Functional Needs (PDAFN)	
Criterion 2.c.1	X
SUB-ELEMENT 2.d – Radiological Assessment and Decision-Making for the Ingestion Exposure Pathway	
Criterion 2.d.1	X
SUB-ELEMENT 2.e – Radiological Assessment and Decision-Making Concerning Post Plume Phase Relocation, Reentry and Return	
Criterion 2.e.1	X
Assessment Area 3: Protective Action Implementation	
SUB-ELEMENT 3.a – Implementation of Emergency Worker Exposure Control	
Criterion 3.a.1	X
SUB-ELEMENT 3.b – Implementation of KI Decision for Institutionalized Individuals and the Public	
Criterion 3.b.1	X
SUB-ELEMENT 3.c. – Implementation of Protective Actions for Persons with Disabilities and Access/Functional Needs	
Criterion 3.c.1	X
Criterion 3.c.2	X
SUB-ELEMENT 3.d. – Implementation of Traffic and Access Control	
Criterion 3.d.1	X
Criterion 3.d.2	X
SUB-ELEMENT 3.e – Implementation of Ingestion Exposure Pathway Decisions	
Criterion 3.e.1	X

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Criterion 3.e.2	**X**
SUB-ELEMENT 3.f – Implementation of Post-Plume Phase Relocation, Reentry, and Return Decisions	
Criterion 3.f.1	**X**
Assessment Area 4: Field Measurements And Analyses	
SUB-ELEMENT 4.a – Plume Phase Field Measurements and Analyses	
Criterion 4.a.1 [Reserved]	**n/a**
Criterion 4.a.2	**X**
Criterion 4.a.3	**X**
SUB-ELEMENT 4.b – Post Plume Phase Field Measurements and Sampling	
Criterion 4.b.1	**X**
SUB-ELEMENT 4.c – Laboratory Operations	
Criterion 4.c.1	**Out of Sequence**
Assessment Area 5: Emergency Notification and Public Information	
SUB-ELEMENT 5.a – Activation of the Prompt Alert and Notification System	
Criterion 5.a.1	**X**
Criterion 5.a.2 [Reserved]	**n/a**
Criterion 5.a.3	**X**
Criterion 5.a.4	**X**
SUB-ELEMENT 5.b. – Emergency Information and Instructions for the Public and the Media	
Criterion 5.b.1	**X**
Assessment Area 6: Support Operations/Facilities	
SUB-ELEMENT 6.a – Monitoring, Decontamination, and Registration of Evacuees	
Criterion 6.a.1	**No**
SUB ELEMENT 6.b Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles	
Criterion 6.b.1	**No**
SUB-ELEMENT 6.c – Temporary Care of Evacuees	
Criterion 6.c.1	**No**
SUB-ELEMENT 6.d – Transportation and Treatment of Contaminated Injured Individuals	**Out of Sequence**
Criterion 6.d.1	

Intent: describes the origin and purpose of the Assessment Area Sub-element.
Criterion: identifies the applicable NUREG-0654/FEMA-REP-1 Evaluation Criteria and interprets the essentials of emergency actions associated with that Sub-element.
Extent of Play: provides a baseline for the extent of demonstration, or "play," required for a given Demonstration Criterion during an exercise or assessment in a different venue (i.e., drill, training, etc.).
NH Extent of Play: exercise specific details for extent of play.
Special Disclaimer: Due to exercise scenario time constraints, some responses and/or activities associated with certain classification levels may be significantly compressed or exaggerated such as reception center personnel arrival time, transportation asset scheduling, etc.

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**If during the exercise a participant unsatisfactorily demonstrates sub-element 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 4.a.3, 4.b.1, 5.b.1, 6.a.1 or 6.b.1, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.*

1 - Emergency Operations Management

1.a Mobilization

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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; G.3.a; H.3, 4)

Extent of Play: Responsible OROs must demonstrate the capability to receive notification of an incident from the licensee, verify the notification, and contact, alert, and mobilize key emergency personnel in a timely manner and demonstrate the ability to maintain and staff 24-hour operations. Twenty-four hour operations can be demonstrated during the exercise via rosters or shift changes or otherwise in an actual activation. Local 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 suppression 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.

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New Hampshire Extent of Play:
Accident Assessment – DPHS personnel will be pre-staged at 29 Hazen Drive, Concord, and will demonstrate appropriate mobilization and activation in accordance with remote support operations.
Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
State Transportation Staging Area (STSA) – The STSA will not be evaluated this cycle. The STSA was last evaluated in 2018, and is only required to be evaluated once in an 8-year cycle.

1.b Facilities

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which provides 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)
Extent of Play: Responsible OROs must demonstrate, no less than once every 8 years, the availability of facilities to support accomplishment of emergency operations (this includes all alternate 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.
NH Extent of Play: There are two new facilities in the EPZ. The Newton LEOC is now located at 8D Merrimac Road, Newton, NH; the Kensington LEOC is now located at 95 Amesbury Road, Kensington, NH.

Both new facilities will be assessed out of sequence.

1.c Direction and Control

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which provides 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-

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0654/FEMA-REP-1, A.1.d, 2.a, b; A.3; C.4, 6)
Extent of Play: 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 performed based on the ORO's plans/procedures and completed as they would be in an actual emergency, unless otherwise noted above or otherwise specified in the extent of play agreement.
NH Extent of Play: All units in play will demonstrate communication of situational awareness to the NH SEOC, and receive and communicate all direction from the NH SEOC. A sim cell may be used.

Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

1.d Communications Equipment

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that OROs should establish reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as the following: appropriate contiguous governments within the emergency planning zone (EPZ), Federal emergency response organizations, the licensee and its facilities, emergency operations centers (EOC), and field teams.
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)
Extent of Play: OROs must demonstrate that a primary system and at least one backup system for fixed facilities, is 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 the conduct of 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 communications system and use of an alternate system, as negotiated

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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 otherwise noted above or otherwise specified in the extent of play agreement.
NH Extent of Play: Participating facilities will demonstrate their primary and backup communications systems. Contact with any locations not playing will be simulated.
Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
**Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.*

1.e Equipment and Supplies to Support Operations

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that OROs have emergency equipment and supplies adequate to support the emergency response.
Criterion 1.e.1*: Equipment, maps, displays, dosimetry, 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)
Extent of Play: 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, appropriated 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

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accordance with U.S. Pharmacopoeia standards.[94]

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.

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

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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.

NH Extent of Play: Participating facilities will show that equipment, maps, displays, dosimetry, KI and other supplies are adequate and sufficient to support the emergency response. Documentation of KI inventory will be available for review at DHHS ESU. Dosimetry inspection and inventory is maintained at RIMC. FEMA will provide copies of the Annual Letter of Certification to evaluators as documentation of quarterly inventory and operational checks. Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

**Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.*

2 - Protective Action Decision-Making

2.a Emergency Worker Exposure Control

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which provides that an offsite response organization (ORO) 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 and 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 Total Effective Dose Equivalent or organ-specific limits) identified in the ORO's plans and procedures.

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to insure 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, C.6; J.10.e, f; K.3.a; K.4)

Extent of Play: OROs 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 demonstrate the capability to make decisions concerning the authorization of exposure levels in excess of pre-authorized levels and to the number of emergency workers receiving radiation dose above pre-authorized levels. This would include

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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 the ORO's plan/ procedures or projected thyroid dose compared with the established Protective Action Guides (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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

DPHS EOF staff will analyze utility, field team and meteorological data provided at the EOF to make a recommendation to the State EOC for their consideration in making protective action decisions.

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 on-site and off-site environmental conditions. (NUREG-0654/FEMA-REP-1, I.10, & Supplement 3)
Extent of Play: 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 the 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 prearranged 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.

NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response. The DPHS staff at the EOF will independently verify dose projections performed by the Utility. The SEOC decision-making team will evaluate the protective action recommendations of the Accident Assessment Team and the Utility and develop appropriate protective action decisions. Protective action decisions are demonstrated at the SEOC by Unified Command and based upon information provided from the EOF and other appropriate sources.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) 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)

Extent of Play: 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 public under

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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.
NH Extent of Play: Protective action decisions are demonstrated at the SEOC based upon information provided by the EOF and recommendations from the Accident Assessment personnel who will analyze utility, field monitoring team and meteorological data provided at the EOF.

Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

2.c Precautionary and/or Protective Action Decision Considerations 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 day cares, 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 persons with disabilities and access functional needs. (NUREG-0654/FEMA-REP-1, D.4; J.9; J.10.d,e)
Extent of Play: 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

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actions for students. Demonstration requires that the OROs actually contact public school systems/districts during the exercise.
The OROs must demonstrate how the decision-making process takes 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

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)
Extent of Play: 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.

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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 EPZ. 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.
OROs 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response. The data provided to the state dose assessment team by the Controllers will reasonably represent that which would be provided by the Public Health Department laboratory. The results will be compared to the EPA Protective Action Guidelines (PAGs) and FDA Derived Intervention Levels (DIL). Controllers will then provide additional maps and sample data, showing where PAG and DIL are projected to be exceeded.

Dose Assessment will deliver its findings to the NH SEOC, who will in turn make Protective Action Decisions.

2.e Radiological Assessment and Decision-Making Concerning Post-Plume 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 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)
Extent of Play: **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.

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

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NH Extent of Play:

State EOC: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

All appropriate, state-level and interstate coordination and communication will be demonstrated. Communication and coordination with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with towns or non-participating Federal agencies will be simulated.

Relocation, Re-entry, and Return will be simulated and be discussion only.

3 - Protective Action Implementation

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 and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart. (NUREG-0654/FEMA-REP-1, K.3.a, b; K.4)

Extent of Play: 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

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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., 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.

NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
Dose Assessment: Dosimetry packets will be readied for issuance. Actual distribution and ingestion of KI will not occur. The Radiological Officer will give the Emergency Worker briefing.
Sampling Teams, Public Health Lab (Out of Sequence): Dosimetry packets will be readied for issuance. Actual distribution and ingestion of KI will not occur. The Radiological Officer will give the Emergency Worker briefing.
EPZ EOCs (Out of Sequence): Dosimetry packets will be issued to a minimum of two individuals who will be working inside each EPZ EOC by the local RADEF Officer. Actual distribution and ingestion of KI will not occur. Knowledge of the use of dosimetry through the Plume Phase and NH policies on dosimetry will be demonstrated through an interview with the FEMA Evaluator and only with individuals issued dosimetry.

Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.

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 be made. Appropriate record-keeping of the administration of KI for institutionalized individuals is maintained. (NUREG-0654/FEMA-REP-1, J.10.e, f)

Extent of Play: OROs 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.

NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

**Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.*

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)

Extent of Play: 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

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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 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.
NH Extent of Play:
EPZ EOCs: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
Criterion 3.c.2: OROs/School officials decide upon and implement precautionary and/or protective actions for schools. (NUREG-0654/FEMA-REP-1, J.10.c, d, e, g)
Extent of Play: School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions 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 ORO's 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.
NH Extent of Play:
EPZ EOCs: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
EPZ Schools/Childcare Providers: Participating facilities will be assessed remotely, and out of

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sequence by a FEMA Evaluator who will interview key staff regarding their response plans.

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)

Extent of Play: OROs 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.

NH Extent of Play:

SEOC - All appropriate, state-level and interstate coordination and communication will be demonstrated. Communication and coordination with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with towns or non-participating Federal agencies will be simulated.

Town of Newfields - will be assessed remotely, and out of sequence by a FEMA Evaluator who will interview key staff regarding their response plans

Remaining EPZ EOCs - Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response. The traffic and access control personnel will not be deployed.

Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.

Criterion 3.d.2*: Impediments to evacuation are identified and resolved. (NUREG-0654,

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J.10.k)
Extent of Play: 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 the evacuation. When not possible, actual dispatch of resources need not 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
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
Town of Newfields - will be assessed remotely, and out of sequence by a FEMA Evaluator who will interview key staff regarding their response plans
If the scenario does not lead to evacuation, the criteria shall be deemed complete if the ORO can describe to the Evaluator the actions they would take to overcome a major traffic impediment during an evacuation and how such actions would be communicated to the public and affected OROs.
Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.

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)
Extent of Play: 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria

through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response. Exercise play will include demonstration of communications and coordinate that will be required between organizations to implement ingestion pathway protective actions. However, actual field play of implementation activities will be simulated. For example, communication and coordination with agencies responsible for implementing food, milk, and water controls within the ingestion pathway EPZ will be simulated by showing evaluators the contact list of farmer, food producers, and processors that would be used in a real emergency.

All appropriate State level and interstate coordination and communication will be demonstrated. Coordination and communications with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with communities or non-participating Federal agencies will be simulated by logging the calls.

All appropriate news releases informing the public of protective actions and other essential information will be developed and distribution will be simulated. All prepared news releases will be provided to the evaluator for review.

SEOC will discuss methods of distributing instructional material on ingestion-related protective actions to the public and to farmers, food processors, and food distributors, but actual distribution will be simulated.

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)

Extent of Play: 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.

NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production and are coordinated as appropriate.

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)

Extent of Play: 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 make decisions regarding 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

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or actual contacts must be documented. These discussions may be accomplished in a group setting.
OROs will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other necessary 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Decisions regarding controlled relocation, re-entry, and return are coordinated with appropriate organizations and implemented per plans and procedures with communication and coordination with State agencies within the NH SEOC Unified Command.

Local EPZ communities will not be participating on Day 2; contact will be simulated. Traffic and access control will be coordinated per plans and procedures. No deployment will occur. News releases will be prepared and distributed within the State EOC and the JIC. All other distribution will be simulated.

4 - Field Measurement and Analysis

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)
Extent of Play: 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 field monitoring teams' 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
Two DPHS Radiological Field Monitoring Teams (FMT1 & FMT2) will simulate dispatch by the DPHS Radiological Chemistry Laboratory Supervisor located at the DPHS Radiological Chemistry Laboratory at 29 Hazen Drive in Concord. The DPHS Radiological Chemistry Laboratory Supervisor will assign vehicles and team numbers and radio call signs. He/she will provide an initial briefing and simulate dispatching the teams to a staging area or a sampling location.
Environmental sampling data will be provided the Field Monitoring Teams by the exercise controller. If it is necessary to collect monitoring team data out-of-sequence, controller data will be provided to the accident assessment team to facilitate the accident assessment process during the plume phase.
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)
Extent of Play: 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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.

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)
Extent of Play: 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.
OROs 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.

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NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

If it is necessary to collect sampling team data out-of-sequence, controller data will be provided to facilitate exercise.
(Out of Sequence) The sampling location will provide the appropriate sample matrices. The sampling matrices are as indicated in 2.d.1 of the EXTENT OF PLAY. One sample each, from each team, of the following will be collected: SURFACE WATER, SOIL and VEGETATION.

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)
Extent of Play: 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., transuranics 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 radioanalytical techniques and contamination control procedures.
OROs 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.
NH Extent of Play: TO BE DEMONSTRATED OUT OF SEQUENCE. Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
The scenario will provide a prepared series of representative samples, which the lab will receive.

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Through a process of discussion and demonstration, the Lab will demonstrate initial receipt, chain-of-custody determination and sample preparation for analysis on one of the samples. A discussion of how other sample types will be prepared for analysis and counted will be provided. The Lab will provide, through discussion, the method of calibration of counting instruments, the library of isotopes and detection sensitivity. The Lab will discuss their internal quality control process. The actual counting of samples will not be demonstrated, as this would take too long. There will be no spiking of samples with radioisotopes.

5 - Emergency Notification and Public Information

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.

Demonstration Criterion:	In a Timely Manner	Within 45 minutes	Within a Reasonable Time
Primary Alert and Notification			
5.a.1: …covering essentially 100% of the 10-mile EPZ	X		
5.a.4: …for FEMA- approved exception areas		X	
Backup Alert and Notification for All Incidents			
5.a.3: …covering the 10-mile EPZ			X

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)

Extent of Play: 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:

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- 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.
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.
NH Extent of Play: Credit was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
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)
Extent of Play: 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,

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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, only one route needs to be selected and demonstrated. 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
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Criterion 5.a.4: Activities associated with FEMA-approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. (NUREG-0654/FEMA-REP-1, E.6; Appendix 3.B.2.c)
Extent of Play: OROs with FEMA-approved exception areas (identified in the approved Alert and Notification System Design Report), 5 to 10 miles from the NPP, must demonstrate the capability to accomplish primary alerting and notification of the exception area(s). FEMA and the NRC recommend that OROs and operators establish means that will reach those in approved exception areas within 45 minutes once the initial decision is made by authorized offsite emergency officials to notify the public of an incident. The exception area 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.
For exception area alerting, at least one route must 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 broadcasted) as negotiated in the extent of play. Actual testing of the mobile public address system will be conducted at an agreed-upon location. For exception areas alerted by air/ water craft, actual routes will be negotiated in the extent of play, but must be demonstrated no less than once every eight years.
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.
NH Extent of Play: This criterion is not required by the New Hampshire Radiological Emergency Response Plan

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,

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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)

Extent of Play: 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 emergency information (e.g., EAS messages and

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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.
NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.
SEOC: News releases and public information, including those decisions regarding controlled relocation, re-entry, and return of the public will be prepared for Protective Action Decisions, but dissemination will be simulated.
Note: If during the exercise a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the participant and the Controller. After an on the spot re-training by the state or local organization, the FEMA Evaluator will provide the participant another opportunity to re-demonstrate the activity that same day.

6 - Support Operation/Facilities

6.a. Monitoring, Decontamination and Registration of Evacuees

Intent: This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)
Extent of Play: 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 1/3 of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(ies) as necessary to monitor 20% 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

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evacuees must demonstrate the capability to attain and sustain, within about 12 hours, a monitoring productivity rate per hour needed to monitor the 20% emergency planning zone (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 individuals per monitoring station 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 in order to determine whether the twelve-hour requirement can be met.

OROs must demonstration 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. 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 decontamination 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 evacuees, provide changes of clothing for those with contaminated clothing; and store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. In addition, for any evacuee found to be contaminated, procedures must be discussed concerning the 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 or have been placed in a secure area until they can be monitored and decontaminated, if necessary.

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 being held in a secure area or free from contamination prior to entering the congregate care areas.

NH Extent of Play: This sub-element will not be demonstrated during this exercise.

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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)

Extent of Play: 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 decontamination 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.

OROs 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 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.

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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.
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.
NH Extent of Play: This sub-element will not be demonstrated during this exercise.

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)
Extent of Play: 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 secured 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.

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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.
NH Extent of Play: This sub-element will not be demonstrated during this exercise.

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)
Extent of Play: FEMA has determined that these capabilities have been enhanced and consistently demonstrated as adequate; therefore, offsite medical services drills need only be 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.
OROs 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

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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 defers monitoring to the medical facility, then the ambulance crew presumes that the patient(s) is contaminated and demonstrate appropriate contamination controls until the patient(s) 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.

The medical facility must demonstrate the capability to make decisions on 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. Waste water 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.

NH Extent of Play: Credit for the Plume portion of the exercise was given for this criteria through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

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EVALUATION AREAS AND EXTENT OF PLAY
December 8, 2020 Plume Exercise
December 9, 2020 Ingestion Pathway Exercise
Overview

The following organizations/locations will demonstrate in 2020:

State Emergency Operations Center
Massachusetts Emergency Management Agency
Massachusetts Department of Public Health
Massachusetts State Police
MassDOT
Massachusetts National Guard
Massachusetts Department of Agricultural Resources
Massachusetts MDPH Food Protection Program
Massachusetts Department of Environmental Protection
Massachusetts Department of Fish & Game
Massachusetts Department of Conservation & Recreation
Massachusetts Department of Mental Health
Office of the Secretary of the Commonwealth
American Red Cross
Federal Emergency Management Agency Region I
NextEra Energy Seabrook Station Liaison
MASS 211 Call Center

Region I Emergency Operations Center
Massachusetts Emergency Management Agency – Region I
Massachusetts State Police – Troop A
MassDOT
Massachusetts Department of Mental Health
American Red Cross
Central Medical Emergency Direction (C-Med)
Region I EOC Volunteer Staff
RACES Volunteer Staff

Emergency Operations Facility
Massachusetts Emergency Management Agency
Massachusetts Department of Public Health/Radiation Control Program
NextEra Energy Seabrook Station

Radiological Field Monitoring and Sampling Teams
Massachusetts Department of Public Health/Radiation Control Program
NextEra Energy Seabrook Station

Joint Information Center
Massachusetts Emergency Management Agency
NextEra Energy Seabrook Station

Risk Jurisdictions

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Amesbury EOC
Merrimac EOC
Newbury EOC
Newburyport EOC
Salisbury EOC
West Newbury EOC

The following demonstrations were conducted out of sequence during

Schools (Note: * Denotes KI participation):

The following organizations/locations will be demonstrated in 2019/2020:

Appendix: Further explanation of criteria starts on Page 19

Per FEMA Region I Memorandum dated, August 4, 2010, "On the Spot" corrections as outlined in Recommendation Initiative 1.5 – Correct Issues Immediately is approved for the following criterion: 1.d.1, l.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 4.a.3, 4.b.1, 5.b.1, 6.a.1, and 6.b.1.

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EVALUATION 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 Offsite Response Organizations (ORO) 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; G.3.a; H.3, 4)

Massachusetts Extent of Play

Emergency Operations Facility (EOF)—MEMA and MDPH personnel will be pre-staged in the area of the EOF using a ten minute per hour travel time.

Credit was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Sub-element 1.b – Facilities

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have facilities to support the emergency response.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.
(NUREG0654/FEMA-REP-1, G.3.a; H.3; J.10.h; J.12; K.5.b)

Massachusetts Extent of Play

EPZ Facilities: There are 3 new facilities in the EPZ. Newburyport EOC will be located as of March 2020 at 16c Perry Way (Newburyport Water and Sewer) in Newburyport. The Merrimac EOC will be relocating to 2 Jana Way in Merrimac during the summer of 2020. Newbury's EOC will be inside the newly built Newbury Police Department at High Road and Morgan Avenue. (It is possible this facility

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may not completed by December 2020.)

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Sub-element 1.c - Direction and Control

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Massachusetts Extent of Play

EOF: The Emergency Operations Facility (EOF) will demonstrate communication of situational awareness to the SEOC and receive and communicate all direction from the SEOC. A sim cell will be used.

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Sub-element 1.d – Communications Equipment

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) establish and operate reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as contiguous governments within the emergency planning zone (EPZ), Federal emergency response organizations, the licensee and its facilities, emergency operations centers (EOC), Incident Command Posts and field monitoring teams.

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)

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Massachusetts Extent of Play

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

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

Massachusetts Extent of Play

The Emergency Operating Facility (EOF) is outside of the Emergency Planning Zone and does not need to demonstrate KI or dosimetry.

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

EVALUATION AREA 2: Precautionary and/or 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 Offsite Response Organizations (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 Total Effective Dose Equivalent 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)

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Massachusetts Extent of Play

Protective action decisions will be pass through from the Massachusetts State EOC (simulated on Day 1) based upon information provided from the EOF.

MDPH Radiation Control Program EOF staff will analyze utility, field team and meteorological data provided at the EOF to make a recommendation to the State EOC for their consideration in making protective action decisions.

Credit for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Sub-element 2.b. - Radiological Assessment and 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 Offsite Response Organizations (ORO) 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 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)

Massachusetts Extent of Play

The State EOC decision-making team (sim cell) will simulate the evaluation of protective action recommendations based on information provided from the EOF. The State EOC decision-making team (sim cell) will simulate the protective action decisions and communicate information back to the EOF

Credit for this criteria at all other state and local locations through demonstration and documentation

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during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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 (PAD) 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, 10.e, f, m)

Massachusetts Extent of Play

Protective action decisions are demonstrated at the Massachusetts State EOC (Sim Cell) based upon information provided by the EOF. MDPH Radiation Control Program staff will analyze the Utility, field monitoring and meteorological data provided at the EOF to make a recommendation to the State EOC for their consideration in making protective action decisions.

Credit for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Sub-element 2.c – Precautionary and/or Protective Action Decisions 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 Offsite Response Organizations (ORO) have the capability to determine precautionary and/or protective action decisions, including evacuation, sheltering and use of potassium iodide (KI), if applicable, for groups of persons with disabilities and access/functional needs(e.g., hospitals, nursing homes, correctional facilities, schools, licensed day care, 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 a nuclear power plant.

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)

Massachusetts Extent of Play

Credit for this criteria at all other state and local locations through demonstration and documentation

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during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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 Offsite Response Organizations (ORO) have the means to assess the radiological consequences for the ingestion exposure pathway, relate them to the appropriate PAGs, and make timely, appropriate protective action decisions to mitigate exposure from the ingestion pathway. During an accident at a nuclear power plant, 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 accident and, depending on the nature of the release, could impact the ingestion 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)

Massachusetts Extent of Play

Day 2, as required by the scenario, NIAT dose assessment team will demonstrate the capability to project ingestion pathway doses and develop ingestion pathway protective action decisions in accordance with the NIAT Handbook. This will include assessing and comparing laboratory results of environmental samples (e.g. milk, water, and other food products of concern.

To allow this process to be demonstrated, controllers will provide the necessary information and data bases on the field monitoring and sampling strategy established by the assessment team. Controller information and data to be provided will include aerial monitoring data, field monitoring data, and laboratory analysis results of environmental samples (e.g., milk, water, and other food products) within the area of concern. Controller provided data will be in the form of information normally available from various Federal and State agencies and other support laboratory facilities. Controllers will provide information and data based on the assumed scenario time frame and response activities of the players.

NOTE: Massachusetts would like to request that dose assessment activities be demonstrated out of sequence from the table-top decisions from Day 2 of the exercise plan and demonstration. This out of sequence demonstration will be coordinated with FEMA and potential consideration of COVID-19 protective measures to allow for this demonstration.

Findings: N/A

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

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to make decisions on post-plume relocation, re-entry, and return of the general public. These decisions are essential for the protection of the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a nuclear power plant.

Criterion 2.e.1: Timely post-plume phase relocation, re-entry, 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)

Massachusetts Extent of Play

State EOC: Day 2, as required by the scenario, decision-making regarding relocation, re-entry to previously evacuated areas, and return to previously evacuated areas will be demonstrated.

Re-entry will be simulated and be discussion only.

All appropriated State-level and interstate coordination and communication will be demonstrated. Communication and coordination with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with towns or non-participating Federal agencies will be simulated by logging the call(s).

MDPH: Controller information will be provided to the MDPH NIAT dose assessment team so that they may be able to demonstrate the capability to calculate integrated doses with the contaminated areas and compare the results with the protective action guides for deposited radioactive materials. Decisions on relocation, re-entry, and return will be made in accordance with the NIAT Handbook based on these assessments.

NOTE: Massachusetts would like to request that dose assessment activities be demonstrated out of sequence from the table-top decisions from Day 2 of the exercise plan and demonstration. This out of sequence demonstration will be coordinated with FEMA and potential consideration of COVID-19 protective measures to allow for this demonstration.

Findings: N/A

EVALUATION 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; the 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 protective action guides, and the

capability to provide KI for emergency workers, always applying the ALARA (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 recordkeeping of the administration of KI to emergency workers. (NUREG-0654/FEMA-REP-1, K.3.a, b; K.4)

Massachusetts Extent of Play

EPZ EOCs: Dosimetry packets will be readied for issuance in each EPZ EOC. Actual distribution and ingestion of KI will not occur. Empty KI tablet containers (small zip-lock bags) will be included in the dosimetry packets for emergency workers. The Radiological Officer will give the Emergency Worker briefing.

EOF: Emergency Operations Facility (EOF) will not have to demonstrate the use of dosimetry or KI as the facility is outside the 10 mile Emergency Planning Zone.

Credit for the Plume portion of the exercise was given for this criteria at all other state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) have the capability to provide KI 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 in ORO's plans/procedures. Provisions should include the availability of adequate quantities, storage, and means of the distribution of KI.

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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)

Massachusetts Extent of Play

Schools, day cares, and special facility staff who administer KI will be interviewed out-of-sequence by the FEMA Evaluator. The FEMA Evaluator will check the availability of adequate quantities, storage, and means of KI distribution.

Findings: N/A

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 Offsite Response Organizations (ORO) 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 a nuclear power plant.

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)

Massachusetts Extent of Play

Credit was given for this criteria at all state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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

Massachusetts Extent of Play

Credit was given for this criteria at all state and local locations through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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

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Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Massachusetts Extent of Play

Newburyport EPZ EOCs: EOCs will demonstrate the ability to direct and monitor traffic control operations within their jurisdictions through discussions with the evaluator. The local EOC highway and/or Law Enforcement representative will participate in a discussion of procedures and resources available for traffic control. No personnel or equipment will be deployed to field locations.

Credit was given for this criteria at all other state and local locations, except Newburyport EOC through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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

Massachusetts Extent of Play

Newburyport EPZ EOCs: Each EPZ Local EOC will demonstrate rerouting of traffic following a traffic impediment through an interview with the FEMA Evaluator. No personnel or equipment will be dispatched to the simulated accident scene.

Credit was given for this criteria at all other state and local locations except Newburyport through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

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Findings: N/A

Sub-element 3.e – Implementation of Ingestion 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 Food and Drug Administration guidance, for the ingestion pathway EPZ (i.e., the area within an approximate 50-mile radius of the nuclear power plant). 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)

Massachusetts Extent of Play

State EOC – Exercise play will include demonstration of communications and coordination that will be required between organizations to implement ingestion pathway protective actions. However, actual field play of implementation activities will be simulated. For example, communication and coordination with agencies responsible for implementing food, milk, and water controls within the ingestion pathway EPZ will be simulated by showing evaluators the contact list(s) of farmers, food producers, and processors that would be used in a real emergency. Since the information is confidential, a copy will not be provided to the evaluator; however, the evaluator will be shown either a hard copy or the data on a computer.

All appropriate State level and interstate coordination and communication will be demonstrated. Coordination and communications with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with communities or non-participating Federal agencies will be simulated by logging the call(s).

All appropriate news releases informing the public of protective actions and other essential information will be developed and will distribution will be simulated. All prepared news releases will be provided to the evaluator for review.

MDPH and other state agencies will discuss methods of distributing pre-printed instructional material on ingestion-related protective actions to the general public and to farmers, food processors, and food distributors. Brochures for farmers, agricultural workers, food processors, and food distributors are available and stockpiled for distribution as needed. Distribution lists will be provided by the MA Department of Public Health Food Protection Program, MA Department of Agricultural Resources, and the MA Department of Fish & Game and distributions methods will be discussed, but actual distribution will be simulated.

Findings: N/A

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)

Massachusetts Extent of Play

Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production and are coordinated as appropriate, based on plans and procedures.
MDPH and other state agencies will demonstrate communication and coordination with each other to show the capability to control, restrict and prevent distribution of contaminated food and other food controls. Communications with food producers and processor will be simulated.

Findings: N/A

Sub-element 3.f – Implementation of Post-Plume Phase Relocation, Re-entry, and Return Decisions

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to implement plans, procedures, and decisions for post-plume phase relocation, re-entry, and return. Implementation of these decisions is essential for protecting the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a commercial nuclear power plant.

Criterion 3.f.1: Decisions regarding controlled re-entry, 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)

Massachusetts Extent of Play

Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented per plans and procedures with communication and coordination with State agencies within the State EOC.

On Day 2, Local EPZ communities will not be participating; contact will be simulated. Traffic and access control will be coordinated per plans and procedures. No deployment will occur.

News releases will be prepared and distribution will be simulated.

Findings: N/A

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EVALUATION AREA 4: Field Measurement and Analysis

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 Offsite Response Organizations (ORO) have the capability to deploy field teams 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 field monitoring teams within the plume exposure pathway EPZ to detect airborne radioiodine in the presence of noble gases and to measure radioactive particulate material in the airborne plume. In an incident at a nuclear power plant, 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)

Massachusetts Extent of Play

Credit was given for this criteria at all other state and local locations except Newburyport through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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

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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)

Massachusetts Extent of Play

Credit was given for this criteria at all other state and local locations except Newburyport through demonstration and documentation during the following activities: March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID-19 Response.

Findings: N/A

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

Intent

This sub-element is derived from the NUREG-0654/FEMA-REP-1, which requires that the 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, re-entry and return decisions. This sub-element focuses on collecting environmental samples for laboratory analyses that are essential for decisions on protecting the public form 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.

Massachusetts Extent of Play

One, 2 person NIAT Environmental Sampling Team will be demonstrated. Post Plume field kits are stored at the Massachusetts State Laboratory Institute in Jamaica Plain. By procedure, the Environmental Sampling Team is dispatched under the direction of the Radiation Control Program Director or designee for Post-Plume activities based on the accident event. However, the sampling team will be dispatched from an agreed upon designated location to facilitate exercise play. Environmental Sampling Kits will be delivered to the designated muster point to facilitate play.

The sample team will demonstrate the process to collect environmental samples in accordance with the NIAT Handbook Section D.5 (Environmental Sampling Procedure). The sample team personnel will collect and prepare one sample media for vegetation and soil sample. The use of personal protective equipment (PPE) will be simulated.

NOTE: Massachusetts would like to request that environmental sampling team activity be demonstrated out of sequence from the table-top decisions from Day 2 of the exercise plan and demonstration. This out of sequence demonstration will be coordinated with FEMA and potential consideration of COVID-19 protective measures to allow for this demonstration.

Findings: N/A

Sub-element 4.c - Laboratory Operations

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Massachusetts Extent of Play

TO BE DEMONSTRATED OUT OF SEQUENCE (see Note below)

Laboratory operations at the Massachusetts Environmental Radiation Laboratory (MERL) at Jamaica Plain, MA will be demonstrated for the analysis of environmental samples associated with the post-plume phase of the exercise and with consideration of the COVID-19 real world issues.

Controllers will provide pre-packaged environmental samples of soil, water, and food crop product (e.g., squash, zucchini etc. within the area of concern) for demonstrating laboratory operations.

MERL staff will demonstrate receiving and processing the pre-packaged samples as though the samples were collected and transported from the field. This will include receipt, logging of information, preventing contamination of the laboratory, preventing build-up of background radiation from sample storage, preventing cross contamination, preserving perishable samples, and preparing samples for counting. Radioactive material will not be used to spike samples.

Preparation for analysis will be walk-through or demonstrated (if the time frame of exercise play allows) for pre-packaged environmental samples. The MERL personnel will demonstrate initial counting of the samples; however, full counting periods will be truncated to facilities exercise play. Laboratory staff will discuss with the evaluator appropriate counting times for samples to be processed.

NOTE: Massachusetts will like to request that laboratory operations at the Massachusetts Environmental Radiation Laboratory (MERL) at Jamaica Plain, MA be demonstrated out of sequence for exercise purposes. This out of sequence demonstration will be coordinated with FEMA and potential consideration of COVID-19 protective measures to allow for this demonstration.

Findings: N/A

EVALUATION 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 pathway EPZ. Specific provisions addressed in this sub-element are further discussed in Section V, Part A of the REP manual, Alert and Notification Systems.

Exhibit III-4: Evaluation Standards for Alert and Notification Systems

Demonstration	***In a Timely***	***Within 45 Minutes***	***Within a***

Criteria:	*Manner*		*Reasonable Time*
Primary Alert and Notification			
5.a.1: ...covering essentially 100% of the 10-mile EPZ	*X*		
5.a.4: ...for FEMA-approved exception areas		*x*	
Backup Alert and Notification for All Incidents			
5.a.3: ...covering the 10-mile EPZ			*x*

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)

Massachusetts Extent of Play

Credit was given for this criteria through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the Covid 19 Response.

Findings: N/A

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. (NUREG0654/FEMA-REP-1, E.6; Appendix 3.B.2.c)

Massachusetts Extent of Play

Credit was given for this criteria through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the Covid 19 Response.

Findings: N/A

Criterion 5.a.4: Activities associated with FEMA- approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. (NUREG-0654/FEMA-REP-1, E. 6; Appendix 3.B.2.c)

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Massachusetts Extent of Play

This criterion is not required by the Massachusetts Radiological Emergency Response Plan.

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 Offsite Response Organizations (ORO) 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 that 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 should 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)

Massachusetts Extent of Play

Joint Information Center/State EOC/ EPZ Towns for Plume: Credit was given for this criteria at these locations through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the Covid 19 Response.

Ingestion Path Information: News releases and public information, including those decisions regarding controlled re-entry of emergency workers and relocation and return of the public, will be prepared for Protective Action Decisions but dissemination will be simulated.

Findings: N/A

EVALUATION AREA 6: Support Operation/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 Offsite Response Organizations (ORO) 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

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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)

Massachusetts Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

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 Offsite Response Organizations (ORO) 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)

Massachusetts Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

Sub-element 6.c - Temporary Care of Evacuees

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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.

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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)

Massachusetts Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

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 Offsite Response Organizations (ORO) 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)

Massachusetts Extent of Play

Hospital will be demonstrated out of sequence

Findings: N/A

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Appendix to Extent of Play – Further Explanations of Criteria
EVALUATION 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 Offsite Response Organizations (ORO) 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; G.3.a; H.3, 4)

Extent of Play

Responsible OROs must demonstrate the capability to receive notification of an incident from the licensee, verify the notification, and contact, alert, and mobilize key emergency personnel in a timely manner and demonstrate the ability to maintain and staff 24-hour operations. Twenty-four hour operations can be demonstrated during the exercise via rosters or shift changes or otherwise in an actual activation. Local 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 suppression 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

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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.

Sub-element 1.b – Facilities

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have facilities to support the emergency response.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.
(NUREG0654/FEMA-REP-1, G.3.a; H.3; J.10.h; J.12; K.5.b)

Extent of Play

Responsible OROs must demonstrate, no less than once every 8 years, the availability of facilities to support accomplishment of emergency operations (this includes all alternate 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.

Sub-element 1.c - Direction and Control

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

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Extent of Play

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

Sub-element 1.d – Communications Equipment

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) establish and operate reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as contiguous governments within the emergency planning zone (EPZ), Federal emergency response organizations, the licensee and its facilities, emergency operations centers (EOC), Incident Command Posts and field monitoring teams.

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)

Extent of Play

OROs must demonstrate that a primary system and at least one backup system for fixed facilities, is 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 the conduct of emergency operations. OROs must ensure that a coordinated communication link for fixed and mobile medical

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support facilities exists. Exercise scenarios may require the failure of a communications 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 otherwise noted above or otherwise specified in the extent of play agreement.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.*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 Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

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

Extent of Play

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, appropriated 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.[94]

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*

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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.

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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State

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representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

EVALUATION AREA 2: Precautionary and/or 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 Offsite Response Organizations (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 Total Effective Dose Equivalent 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)

Extent of Play

OROs 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 demonstrate the capability to make decisions concerning the authorization of exposure levels in excess of pre-authorized levels and to the number of emergency workers receiving radiation dose 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 the ORO's plan/ procedures or projected thyroid dose compared with the established Protective Action Guides (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.

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Sub-element 2.b. - Radiological Assessment and 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 Offsite Response Organizations (ORO) 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 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)

Extent of Play

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 plan/procedures, to develop protective action recommendations (PAR) for decision-makers based on available information and recommendations provided from the licensee as well as and 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 prearranged 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 used, using different models, or exploring possible reasons. Resolution of these differences must be incorporated into the PAR 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.

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 (PAD) for

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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, 10.e, f, m)

Extent of Play

Offsite Response Organizations (ORO) 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 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.

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Sub-element 2.c – Precautionary and/or Protective Action Decisions 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 Offsite Response Organizations (ORO) have the capability to determine precautionary and/or protective action decisions, including evacuation, sheltering and use of potassium iodide (KI), if applicable, for groups of persons with disabilities and access/functional needs(e.g., hospitals, nursing homes, correctional facilities, schools, licensed day care, 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 a nuclear power plant.

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)

Extent of Play

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, examples of factors must be considered include weather conditions, shelter availability, availability of transportation assets, risk of evacuation vs. 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 decision-making process takes 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, enroute 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 associated 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.

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 Offsite Response Organizations (ORO) have the means to assess the radiological consequences for the ingestion exposure pathway, relate them to the appropriate PAGs, and make timely, appropriate protective action decisions to mitigate exposure from the ingestion pathway. During an accident at a nuclear power plant, a release of radioactive material may contaminate water supplies and agricultural products in the surrounding areas.

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Any such contamination would likely occur during the plume phase of the accident and, depending on the nature of the release, could impact the ingestion 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)

Extent of Play

Offsite Response Organizations (ORO) 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 Emergency Classification Levels (ECL). Such actions may include recommendations to place milk animals on stored feed and to 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 should include the 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 the 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 plan/procedures. The plans/ procedures contain PAGs based on specific dose commitment criteria or on criteria as recommended by current Food and Drug Administration 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 pathway dose commitments.

The ORO must demonstrate timely decisions to minimize radiological impacts from the ingestion pathway, based on the given assessments and other information. Any such decisions must be communicated and, to the extent practical, coordinated with neighboring and local OROs. These decisions include tracking agricultural products entering and leaving the EPZ. 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. OROs should use Federal resources, as identified in the Nuclear/Radiological Incident Annex of the NRF and other resources (e.g., compacts, nuclear insurers), as necessary. Evaluation of this criterion will take into consideration the level of Federal and other resources participating.

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.

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

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to make decisions on post-plume relocation, re-entry, and return of the general public. These decisions are essential for the protection of the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a nuclear power plant.

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Criterion 2.e.1: Timely post-plume phase relocation, re-entry, 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)

Extent of Play

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 vs. the PAGs, and analyses of vegetation and soil field samples.*

Re-entry: Decisions must be made on the 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 the individual's objectives, locations expected to be visited and associated time frames; availability of maps and plots of radiation exposure rates; and advice on areas to avoid. Control procedures also included 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 re-entry 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 re-enter the restricted zone(s). The extent that OROs need to develop policies on re-entry will be determined by scenario events.

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 their 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 the cancellation of the Emergency Classification Level and the 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

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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.

EVALUATION 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; the 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 protective action guides, and the capability to provide KI for emergency workers, always applying the ALARA (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 recordkeeping of the administration of KI to emergency workers. (NUREG-0654/FEMA-REP-1, K.3.a, b; K.4)

Extent of Play

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 individual(s) to read the administrative reporting limits that are pre-established at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent and maximum exposure limits, for those emergency workers involved in life saving activities contained in the ORO's plans/procedures.

Each emergency worker must have the 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

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demonstrate the actions described in the plans/procedures by determining whether to replace the worker, authorize the worker to incur additional exposures, or to take other actions. If exercise play does not require emergency workers to seek authorizations for additional exposure, evaluators must interview at least two emergency 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 co-workers) in providing responses.

Although it is desirable for all emergency workers to each have a direct-reading dosimeter, there may be situations where team members will be in close proximity to each other during the entire mission. In such cases, adequate control of exposure can be affected achieved for all team members using one dosimeter worn by the team leader. Emergency workers who are 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., 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). ORO must ensure that the process used to seek authorizations 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 an 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) have the capability to provide KI 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 in ORO's plans/procedures. Provisions should include the availability of adequate quantities, storage, and means of the distribution of KI.

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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)

Extent of Play

Offsite Response Organizations (ORO) must demonstrate the capability to make KI available to institutionalized individuals, and, where provided for in the ORO 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) 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 a nuclear power plant.

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)

Extent of Play

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

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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 should 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 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.

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

Extent of Play

School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions 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 ORO's plans/procedures as negotiated in the Extent of Play Agreement.

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.

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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 Offsite Response Organizations (ORO) 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)

Extent of Play

OROs must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and protective action decisions (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 by 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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

Extent of Play

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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 the evacuation. When not possible, actual dispatch of resources need not be physically demonstrated; however, all contacts, actual or simulated, should 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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Sub-element 3.e – Implementation of Ingestion 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 Food and Drug Administration guidance, for the ingestion pathway EPZ (i.e., the area within an approximate 50-mile radius of the nuclear power plant). 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)

Extent of Play

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.

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)

Extent of Play

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 the 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.

Sub-element 3.f – Implementation of Post-Plume Phase Relocation, Re-entry, and Return Decisions

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to implement plans, procedures, and decisions for post-plume phase relocation, re-entry, and return. Implementation of these decisions is essential for protecting the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a commercial nuclear power plant.

Criterion 3.f.1: Decisions regarding controlled re-entry, 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)

Extent of Play

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 area(s) that have 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 the 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.

Re-entry: *OROs must demonstrate the capability to control re-entry and exit of individuals who are authorized by the ORO to temporarily re-enter 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 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 procedure subjects are: (1) the 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 the procedures and resources for their restoration. Examples of these services and facilities are medical and social services, utilities, roads, and schools.*

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

OROs should use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex, and other resources (e.g., compacts, nuclear insurers), as necessary, 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.

EVALUATION AREA 4: Field Measurement and Analysis

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 Offsite Response Organizations (ORO) have the capability to deploy field teams 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 field monitoring teams within the plume exposure pathway EPZ to detect airborne radioiodine in the presence of noble gases and to measure radioactive particulate material in the airborne plume. In an incident at a nuclear power plant, 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)

Extent of Play

Responsible Offsite Response Organizations (ORO) must demonstrate the capability to brief field monitoring teams 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 field monitoring teams' activities and location. Coordination with field monitoring teams 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 OROs monitoring teams. If the licensee field monitoring teams 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 field monitoring teams (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.

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)

Extent of Play

Two or more field monitoring teams must demonstrate the capability to make and report measurements ambient

radiation to the field team coordinator, dose assessment team, or other appropriate authority. Field monitoring teams 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 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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

Intent

This sub-element is derived from the NUREG-0654/FEMA-REP-1, which requires that the 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, re-entry and return decisions. This sub-element focuses on collecting environmental samples for laboratory analyses that are essential for decisions on protecting the public form 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.

Extent of Play

The ORO's Field Monitoring Teams 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 re-entry, 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 Field Monitoring teams 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 surface in areas that received radioactive ground deposition.

OROs 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

Sub-element 4.c - Laboratory Operations

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Extent of Play

The laboratory staff must demonstrate the capability to follow appropriate procedures for receiving samples, including logging of 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 as anticipated by 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 should be as described in the plans/procedures. New or revised methods may be used to analyze atypical radionuclide releases (e.g., transuranics or as a result of a terrorist event) or if warranted by incident circumstances. Analysis may require resources beyond those of the ORO.

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

OROs will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts, the licensee, 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.

EVALUATION 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 pathway EPZ. Specific provisions addressed in this sub-element are further discussed in Section V, Part A of the REP manual, Alert and Notification Systems.

Exhibit III-4: Evaluation Standards for Alert and Notification Systems

Demonstration Criteria:	***In a Timely Manner***	***Within 45 Minutes***	***Within a Reasonable Time***
Primary Alert and Notification			
5.a.1: ...covering essentially 100% of the 10-mile EPZ	*X*		
5.a.4: ...for FEMA-approved exception areas		*x*	
Backup Alert and Notification for All Incidents			
5.a.3: ...covering the 10-mile EPZ			*x*

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)

Extent of Play

Responsible Offsite Response Organizations (ORO) 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 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 messages 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 Nuclear Power Plant 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 populations 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 OROs 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 8 years. All alert and notification activities along the route(s) must be simulated (that is, 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 must demonstrate any means of primary alert and notification included in their plans/procedures as negotiated in the extent of play agreement.

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

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. (NUREG0654/FEMA-REP-1, E.6; Appendix 3.B.2.c)

Extent of Play

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 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, ***only one route needs to be selected and demonstrated****. All alert and notification activities along the route(s) must be simulated (that is, 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.

Criterion 5.a.4: Activities associated with FEMA- approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. (NUREG-0654/FEMA-REP-1, E. 6; Appendix 3.B.2.c)

Extent of Play

Offsite Response Organizations (ORO) with FEMA-approved exception areas (identified in the approved Alert and Notification System Design Report) 5 to 10 miles from the nuclear power plant must demonstrate the capability to accomplish primary alerting and notification of the exception area(s). FEMA and the NRC recommend that OROs and operators establish means that will reach those in approved exception areas within 45 minutes once the initial decision is made by authorized offsite emergency officials to notify the public of an incident. The exception area 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. For exception area alerting, at least one route needs to be demonstrated and evaluated. The selected route(s) should vary from exercise to exercise. However, the most difficult route(s) must be demonstrated no less than once every 8 years. All alert and notification activities along the route(s) must be simulated (that is, the message that would actually be used is read for the evaluator, but not actually broadcasted) as negotiated in the extent of play. Actual testing of the mobile public address system will be conducted at some agreed-upon location. For exception areas alerted by air/water craft, actual routes will be negotiated in the extent of play, but must be demonstrated no less than once every 8 years.
All activities for this criterion must be based on the ORO's plans/procedures and completed as they would be in an actual emergency, except as noted above or otherwise specified in the extent of play agreement.

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 Offsite Response Organizations (ORO) 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 that 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 should 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)

Extent of Play

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 protective action decisions 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 protective action decisions provided. The ORO must also be prepared to disclose and explain the Emergency Classification Level (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 pathway measures are exercised, OROs must demonstrate that a system exists for rapid dissemination of ingestion pathway information to pre-determined 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 protective action decisions and other emergency information provided to the public. Copies of pertinent 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 for this criterion 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

EVALUATION AREA 6: Support Operation/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 Offsite Response Organizations (ORO) 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)

Extent of Play

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 1/3 of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(ies) as necessary to monitor 20% 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% emergency planning zone (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 individuals per monitoring station 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 in order to determine whether the twelve-hour requirement can be met.

OROs must demonstration 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. 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 decontamination 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 evacuees, provide changes of clothing for those with contaminated clothing; and store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. In addition, for any evacuee found to be contaminated, procedures must be discussed concerning the 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 or have been placed in a secure area until they can be monitored and decontaminated, if necessary.

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 being held in a secure area or free from contamination prior to entering the congregate care areas.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) 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)

Extent of Play

The monitoring staff must demonstrate the capability to monitor emergency worker personnel and their equipment and vehicles for contamination in accordance with the Offsite Response Organizations (ORO) plans/procedures.

Specific attention must be given to equipment, including any vehicles that were in contact 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 OROs 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 2 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 decontamination 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 and uncontaminated individuals where applicable; provide changes of clothing for those with contaminated clothing and personal belongings to prevent further contamination of emergency workers or facilities.

OROs 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 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 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.

All activities associated with this criterion 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.

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA

Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

Sub-element 6.c - Temporary Care of Evacuees

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Extent of Play

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 animal and vehicles, where applicable, have been placed in a secured 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 or 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 associated with this criterion 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.

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 Offsite Response Organizations (ORO) 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)

Extent of Play

Monitoring, decontamination, and contamination control efforts must not delay urgent medical care for the victim. FEMA has determined that these capabilities have been enhanced and consistently demonstrated as adequate; therefore, offsite medical services drills need only be evaluated biennially.

Offsite Response Organizations (ORO) must demonstrate the capability to monitor/decontaminate and transport contaminated, injured individuals to medical facilities.

An ambulance must be used for the 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 enroute, 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 defers monitoring to the medical facility, then the ambulance crew presumes that the patient(s) is contaminated and demonstrate appropriate contamination controls until the patient(s) 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 the treatment of contaminated injured individuals.

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

All activities associated with this criterion 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.

MAINE
EVALUATION AREAS AND EXTENT OF PLAY
Overview

The following organizations/locations will demonstrate in 2020:

State Emergency Operations Center
Maine Emergency Management Agency
Maine Radiological Control Program - DHHS
Maine State Police
Maine DOT
Maine National Guard
Maine Department of Agricultural Resources
Maine Department of Environmental Protection
Maine Department of Inland Fisheries and Wildlife
American Red Cross
Federal Emergency Management Agency Region I
NextEra Energy Seabrook Station Liaison
Maine 211 Call Center

NH State EOC
Maine Emergency Management Agency Liaison

York County EOC
YCEMA EMA
YCEMA Liaison to NHDES on Pease

Radiological Field Monitoring and Sampling Teams
Maine Department of Health and Human Services/Radiation Control Program

Joint Information Center
Maine Emergency Management Agency
York County EMA

Risk Jurisdictions
York County EMA
27 cities and towns in the county

Per FEMA Region I Memorandum dated, August 4, 2010, "On the Spot" corrections as outlined in Recommendation Initiative 1.5 – Correct Issues Immediately is approved for the following criterion: 1.d.1, l.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 4.a.3, 4.b.1, 5.b.1, 6.a.1, and 6.b.1.

EVALUATION 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 Offsite Response Organizations (ORO) 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; G.3.a; H.3, 4)

Extent of Play

Responsible OROs must demonstrate the capability to receive notification of an incident from the licensee, verify the notification, and contact, alert, and mobilize key emergency personnel in a timely manner and demonstrate the ability to maintain and staff 24-hour operations. Twenty-four hour operations can be demonstrated during the exercise via rosters or shift changes or otherwise in an actual activation. Local 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 suppression 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.

Maine Extent of Play

State EOC—Maine Emergency Management (MEMA) SEOC emergency staff, including the Emergency Support Function (ESF) Team staff, Maine Radiological Control Program (MRCP), Maine Department of Transportation (ME DOT), Maine Department of Health and Human Service Radiological Control Program (MRCP), Maine State Police (MSP), Maine Department of Agriculture, Conservation and Forestry, Maine Department of Environmental Protection, Maine Department Inland Fisheries and Wildlife, Maine Army National Guard (MANG), and American Red Cross (ARC), the State Public Information Line (ME 211) staff, the Federal Emergency Management Agency (FEMA). The notification process will be completed and call down rosters will be shown to the FEMA Evaluator. Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

NH State EOC—MEMA Liasion will be sent to the NHEOC using a ten minute per hour travel time.

York County EOC – York County EMA and EOC staff and will have a liaison at the EOF at Pease.

Joint Information Center (JIC)—MEMA personnel will be pre-staged in the area of the JIC, using a ten minute per hour travel time.

MRCP Field Monitoring Team Personnel—Field Team personnel will be pre-staged in the area of the York County EMA Office. Upon notification, the Field Team will report to the York County EMA Office (muster location to pick up equipment and then dispatching into field via EOF instructions), using a ten-minute per hour travel time.

Local EOCs—Local EOC emergency response staff will be pre-staged at TBD outside the local EOC and upon notification, will report to the EOC, using a ten-minute per hour travel time.

Findings: N/A

Sub-element 1.b – Facilities

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have facilities to support the emergency response.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.
(NUREG0654/FEMA-REP-1, G.3.a; H.3; J.10.h; J.12; K.5.b)

Extent of Play

Responsible OROs must demonstrate, no less than once every 8 years, the availability of facilities to support accomplishment of emergency operations (this includes all alternate 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.

Maine Extent of Play

There are no new or substantially changed facilities to be evaluated under this criterion.

Findings: N/A

Sub-element 1.c - Direction and Control

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Extent of Play

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

Maine Extent of Play

If a community is directed to evacuate, EOC personnel will demonstrate continuity of government through a discussion of logistics with the FEMA Evaluator. Closing of the local EOC and relocation will be simulated.

Findings: N/A

Sub-element 1.d – Communications Equipment

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) establish and operate reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as contiguous governments within the emergency planning zone (EPZ), Federal emergency response organizations, the licensee and its facilities, emergency operations centers (EOC), Incident Command Posts and field monitoring teams.

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)

Extent of Play

OROs must demonstrate that a primary system and at least one backup system for fixed facilities, is 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 the conduct of 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 communications 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 otherwise noted above or otherwise specified in the extent of play agreement.

Maine Extent of Play

Participating facilities will demonstrate their primary and backup communication systems.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

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

Extent of Play

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, appropriated 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.[94]

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.

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.

Maine Extent of Play

Participating facilities will demonstrate that equipment, maps, displays, dosimetry, KI and other supplies are adequate and sufficient to support the emergency response. FEMA will provide copies of the Annual Letter of Certification to evaluators as documentation of quarterly inventory and operational checks.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

EVALUATION AREA 2: Precautionary and/or 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 Offsite Response Organizations (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 Total Effective Dose Equivalent 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)

Extent of Play

OROs 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 demonstrate the capability to make decisions concerning the authorization of exposure levels in excess of pre-authorized levels and to the number of emergency workers receiving radiation dose 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 the ORO's plan/ procedures or projected thyroid dose compared with the established Protective Action Guides (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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of

Certification, Staff Assistance Visits, and the COVID 19 Response.

Protective action decisions are demonstrated at the Maine State EOC based upon information provided from the EOF.

Maine Radiation Control Program EOF staff will analyze utility, field team and meteorological date provided at the EOF to make a recommendation to the State EOC for their consideration in making protective action decisions.

Findings: N/A

Sub-element 2.b. - Radiological Assessment and 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 Offsite Response Organizations (ORO) 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 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)

Extent of Play

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 plan/procedures, to develop protective action recommendations (PAR) for decision-makers based on available information and recommendations provided from the licensee as well as and 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 prearranged 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 used, using different models, or exploring possible reasons. Resolution of these differences must be incorporated into the PAR 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Demonstration will be in accordance with the Maine RCP Procedure 2.11. The MRCP Dose Assessment Coordinator at the EOF will independently verify dose projections performed by the Utility.

The State EOC decision-making team will evaluate the protective action recommendations and develop appropriate protective action decisions.

Protective action recommendations will be made in accordance with the Maine RCP procedure 2.11.

Findings: N/A

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 (PAD) 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, 10.e, f, m)

Extent of Play

Offsite Response Organizations (ORO) 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 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Protective action decisions are demonstrated at the Maine State EOC based upon information provided by the EOF. Maine Radiation Control Program staff will analyze the Utility, field monitoring and meteorological data provided at the EOF to make a recommendation to the State EOC for their consideration in making protective action decisions.

Findings: N/A

Sub-element 2.c – Precautionary and/or Protective Action Decisions 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 Offsite Response Organizations (ORO) have the capability to determine precautionary and/or protective action decisions, including evacuation, sheltering and use of potassium iodide (KI), if applicable, for groups of persons with disabilities and access/functional needs(e.g., hospitals, nursing homes, correctional facilities, schools, licensed day care, 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 a nuclear power plant.

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)

Extent of Play

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, examples of factors must be considered include weather conditions, shelter availability, availability of transportation assets, risk of evacuation vs. 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 decision-making process takes 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, enroute 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 associated 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Protective action decisions, including those for groups of persons with disabilities and access/functional needs, are demonstrated at the Maine State EOC based upon information provided by Maine Radiation Control Program staff at the EOF. Maine Radiation Control Program staff will analyze Utility, field team and meteorological data provided at the EOF to make a recommendation to the State EOC for their consideration in making protection action decisions.

Findings: N/A

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 Offsite Response Organizations (ORO) have the means to assess the radiological consequences for the ingestion exposure pathway, relate them to the appropriate PAGs, and make timely, appropriate protective action decisions to mitigate exposure from the ingestion pathway. During an accident at a nuclear power plant, 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 accident and, depending on the nature of the release, could impact the ingestion 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)

Extent of Play

Offsite Response Organizations (ORO) 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 Emergency Classification Levels (ECL). Such actions may include recommendations to place milk animals on stored feed and to 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 should include the 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 the 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 plan/procedures. The plans/ procedures contain PAGs based on specific dose commitment criteria or on criteria as recommended by current Food and Drug Administration 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 pathway dose commitments.

The ORO must demonstrate timely decisions to minimize radiological impacts from the ingestion pathway, based on the given assessments and other information. Any such decisions must be communicated and, to the extent practical, coordinated with neighboring and local OROs. These decisions include tracking agricultural products entering and leaving the EPZ. 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. OROs should use Federal resources, as identified in the Nuclear/Radiological Incident Annex of the NRF and other resources (e.g., compacts, nuclear insurers), as necessary. Evaluation of this criterion will take into consideration the level of Federal and other resources participating.

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.

Maine Extent of Play

On day two, MRCPdose assessment team will demonstrate from the SEOC the capability to project ingestion pathway doses and develop ingestion pathway protective action decisions in accordance with the Maine RCP Procedure 2.11. This will include assessing information from the plume phase of the exercise and comparing laboratory results of environmental samples (e.g. milk, water, and other food products of concern.

To allow this process to be demonstrated, controllers will provide the necessary information and data bases on the field monitoring and sampling strategy established by the assessment team. Controller information and data to be provided will include aerial monitoring data, field monitoring data, and laboratory analysis results of environmental samples (e.g., milk, water, and other food products) within the area of concern. Controller provided data will be in the form of information normally available from various Federal and State agencies and other support laboratory facilities. Controllers will provide information and data based on the assumed scenario time frame and response activities of the players.

Findings: N/A

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

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to make decisions on post-plume relocation, re-entry, and return of the general public. These decisions are essential for the protection of the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a nuclear power plant.

Criterion 2.e.1: Timely post-plume phase relocation, re-entry, 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)

Extent of Play

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 vs. the PAGs, and analyses of vegetation and soil field samples.*

Re-entry: Decisions must be made on the 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 the individual's objectives, locations expected to be visited and associated time frames; availability of maps and plots of radiation exposure rates; and advice on areas to avoid. Control procedures also included 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 re-entry 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 re-enter the restricted zone(s). The extent that OROs need to develop policies on re-entry will be determined by scenario events.

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 their 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 the cancellation of the Emergency Classification Level and the 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.

Maine Extent of Play

State EOC: As required by the scenario, decision-making regarding relocation, re-entry to previously evacuated areas, and return to previously evacuated areas will be demonstrated if the State is affected since Maine is in the IPZ.

All appropriated State-level and interstate coordination and communication will be demonstrated. Communication and coordination with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with towns or non-participating Federal agencies will be simulated by logging the call(s).

MRCP: Controller information will be provided to the MRCP dose assessment team so that they may be able to demonstrate the capability to calculate integrated doses with the contaminated areas and compare the results with the protective action guides for deposited radioactive materials. Decisions on relocation, re-entry, and return will be made in accordance with the Maine RCP Procedure 2.11 based on these assessments.

Findings: N/A

EVALUATION 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; the 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 protective action guides, and the capability to provide KI for emergency workers, always applying the ALARA (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 recordkeeping of the administration of KI to emergency workers. (NUREG-0654/FEMA-REP-1, K.3.a, b; K.4)

Extent of Play

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 individual(s) to read the administrative reporting limits that are pre-established at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent and maximum exposure limits, for those emergency workers involved in life saving activities contained in the ORO's plans/procedures.

Each emergency worker must have the 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 to take other actions. If exercise play does not require emergency workers to seek authorizations for additional exposure, evaluators must interview at least two emergency 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 co-workers) in providing responses.

Although it is desirable for all emergency workers to each have a direct-reading dosimeter, there may be situations where team members will be in close proximity to each other during the entire mission. In such cases, adequate control of exposure can be affected achieved for all team members using one dosimeter worn by the team leader. Emergency workers who are 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., 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). ORO must ensure that the process used to seek authorizations 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 an 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.

Maine Extent of Play

IPZ EOCs: Dosimetry will be issued to emergency workers utilizing our State IMAT team. Actual distribution and ingestion of KI will not occur.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) have the capability to provide KI 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 in ORO's plans/procedures. Provisions should include the availability of adequate quantities, storage, and means of the distribution of 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)

Extent of Play

Offsite Response Organizations (ORO) must demonstrate the capability to make KI available to institutionalized individuals, and, where provided for in the ORO 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.

Maine Extent of Play

Maine will be pushing information out via our PIO at the SEOC about KI.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) 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 a nuclear power plant.

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)

Extent of Play

Applicable OROs must demonstrate the capability to alert and notify (i.e., provide protective action recommendations and emergency information and instructions to) persons with disabilities and access/functional needs, including hospitals/medical facilities, licensed day cares, nursing homes, correctional facilities, 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 should 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 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Maine will be utilizing the State Evacuation Transportation Plan to simulate this.

Findings: N/A

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

Extent of Play

School systems/districts (these include public and private schools, kindergartens, and preschools) must demonstrate the ability to implement precautionary and/or protective action decisions 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 ORO's plans/procedures as negotiated in the Extent of Play Agreement.

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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Maine will push communications out to schools via the State EOC.

Findings: N/A

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 Offsite Response Organizations (ORO) 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)***

Extent of Play

OROs must demonstrate the capability to select, establish, and staff appropriate traffic and access control points consistent with current conditions and protective action decisions (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 by 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.

Maine Extent of Play

IPZ EOCs: EOCs will demonstrate the ability to direct and monitor traffic control operations using the State Traffic Control Plan. The local EOC highway and/or Law Enforcement representative will participate in a discussion of procedures and resources available for traffic control. No personnel or equipment will be deployed to field locations.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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

Extent of Play

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 the evacuation. When not possible, actual dispatch of resources need not be physically demonstrated; however, all contacts, actual or simulated, should 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

IPZ EOCs: Maine will follow the State Traffic Control Plan and York ME will utilize its County plan for evacuations if they are needed. Only one Local EOC will demonstrate the coordination with the JIC to communicate the alternate route to evacuees.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

Sub-element 3.e – Implementation of Ingestion 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 Food and Drug Administration guidance, for the ingestion pathway EPZ (i.e., the area within an approximate 50-mile radius of the nuclear power plant). 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)*

Extent of Play

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.

Maine Extent of Play

State EOC – Exercise play will include demonstration of communications and coordination that will be required between organizations to implement ingestion pathway protective actions. However, actual field play of implementation activities will be simulated. For example, communication and coordination with agencies responsible for implementing food, milk, and water controls within the ingestion pathway EPZ will be simulated by showing evaluators the contact list(s) of farmers, food producers, and processors that would be used in a real emergency. Since the information is confidential, a copy will not be provided to the evaluator; however, the evaluator will be shown either a hard copy or the data on a computer.

All appropriate State level and interstate coordination and communication will be demonstrated at the SEOC. Coordination and communications with Federal agencies participating in the exercise will be demonstrated. Any communications or coordination with communities or non-participating Federal agencies will be simulated by logging the call(s).

All appropriate news releases informing the public of protective actions and other essential information will be developed and disseminated within the State EOC. News releases will be sent to the Joint Information Center (if it is still in operation); distribution to EAS Stations will be simulated. All prepared news releases will be provided to the evaluator for review.

MRCP will discuss methods of distributing pre-printed instructional material on ingestion-related protective actions to the general public and to farmers, food processors, and food distributors. Brochures for farmers, agricultural workers, food processors, and food distributors are available and stockpiled for distribution as needed. Distribution lists will be provided by the ME Department of Health and Human Services, ME Department of Agriculture, Conservation and Forestry, and the ME Department of Inland Fisheries and Wildlife and distributions methods will be discussed, but actual distribution will be simulated.

Areas Requiring Corrective Actions (ARCA): N/A

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)

Extent of Play

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 the 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.

Maine Extent of Play

State EOC: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production at the Maine State EOC and are coordinated as appropriate, based on plans and procedures. York County EMA also has a list of Farms from around the County and pre-printed material to send out.

Findings: N/A

Sub-element 3.f – Implementation of Post-Plume Phase Relocation, Re-entry, and Return Decisions

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) have the capability to implement plans, procedures, and decisions for post-plume phase relocation, re-entry, and return. Implementation of these decisions is essential for protecting the public from the direct long-term exposure to deposited radioactive materials from a severe accident at a commercial nuclear power plant.

Criterion 3.f.1: Decisions regarding controlled re-entry, 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)

Extent of Play

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 area(s) that have 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 the 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.

Re-entry: *OROs must demonstrate the capability to control re-entry and exit of individuals who are authorized by the ORO to temporarily re-enter 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 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 procedure subjects are: (1) the 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 the procedures and resources for their restoration. Examples of these services and facilities are medical and social services, utilities, roads, and schools.*
Communications among OROs for relocation, re-entry, and return may be simulated. All simulated or actual contacts must be documented. These discussions may be accomplished in a group setting.

OROs should use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex, and other resources (e.g., compacts, nuclear insurers), as necessary, 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.

Maine Extent of Play

State EOC: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented at the State EOC per plans and procedures.

On Day 2, the MEMA Tech Hazards Program Manager will be located at the State EOC and will participate in discussions regarding logistics. Local IPZ communities will not be participating; contact

will be simulated. Traffic and access control will be coordinated per plans and procedures. No deployment will occur.

News releases will be prepared and distributed within the State EOC and the Joint Information Center Media Center (if operational). All other distribution will be simulated.

Findings: N/A

EVALUATION AREA 4: Field Measurement and Analysis

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 Offsite Response Organizations (ORO) have the capability to deploy field teams 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 field monitoring teams within the plume exposure pathway EPZ to detect airborne radioiodine in the presence of noble gases and to measure radioactive particulate material in the airborne plume. In an incident at a nuclear power plant, 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)

Extent of Play

Responsible Offsite Response Organizations (ORO) must demonstrate the capability to brief field monitoring teams 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 field monitoring teams' activities and location. Coordination with field monitoring teams 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 OROs monitoring teams. If the licensee field monitoring teams 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 field monitoring teams (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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Field Teams: Field Teams are managed by the Field Team Coordinator who is located at the utility EOF. He/she will brief and in conjunction with the utility and other state agencies, dispatch two teams to sampling locations in accordance with the Maine RCP procedure 2.11, as dictated by scenario play.

Field Team personnel will prepare one sample media and the report survey results on the appropriate survey forms to the Field Team Coordinator. Field Team personnel will prepare chain of custody documents as if the samples were being transferred to a lab for analysis. Actual transport of samples will be simulated.

Findings: N/A

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)

Extent of Play

Two or more field monitoring teams must demonstrate the capability to make and report measurements ambient radiation to the field team coordinator, dose assessment team, or other appropriate authority. Field monitoring teams 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 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

One ME Field Team will be dispatched from Augusta in accordance with the Maine RCP procedure 2.11. Once, dispatched, only disposable gloves will be used for actual exercise play. Charcoal cartridges will be used instead of silver zeolite.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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

Intent

This sub-element is derived from the NUREG-0654/FEMA-REP-1, which requires that the 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, re-entry and return decisions. This sub-element focuses on collecting environmental samples for laboratory analyses that are essential for decisions on protecting the public form 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.

Extent of Play

The ORO's Field Monitoring Teams 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 re-entry, 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 Field Monitoring teams 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 surface in areas that received radioactive ground deposition.

OROs 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.

Maine Extent of Play

One, 2-person Field Team will be demonstrated. By procedure, Field Teams are dispatched under the direction of the Radiation Control Program Director or designee for Post-Plume activities based on the accident event. However, field teams will be dispatched from a designated muster point for day 2 activities to facilitate exercise play. Environmental Sampling Kits will be delivered to the designated muster point to facilitate play. The Field Team will be briefed by the Field Team Coordinator.

The team will demonstrate the process to take environmental samples in accordance with the Maine RCP procedure 2.11 (Environmental Sampling Procedure). The field team personnel will collect and prepare one sample media for vegetation and soil sample. The use of personal protective equipment (PPE) will be simulated.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA

Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

Sub-element 4.c - Laboratory Operations

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Extent of Play

The laboratory staff must demonstrate the capability to follow appropriate procedures for receiving samples, including logging of 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 as anticipated by 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 should be as described in the plans/procedures. New or revised methods may be used to analyze atypical radionuclide releases (e.g., transuranics or as a result of a terrorist event) or if warranted by incident circumstances. Analysis may require resources beyond those of the ORO.

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

OROs will use Federal resources as identified in the NRF Nuclear/Radiological Incident Annex and other resources (e.g., compacts, the licensee, 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.

Maine Extent of Play

TO BE DEMONSTRATED OUT OF SEQUENCE ON DAY 2

Laboratory operations at the Maine Health and Environmental Testing Laboratory (HETL) at Augusta, ME will be demonstrated on day two in conjunction with the post-plume phase of the exercise.

Controllers will provide pre-packaged environmental samples of soil, water, and food crop

product (e.g., squash, zucchini etc. within the area of concern) for demonstrating laboratory operations.

HETL staff will demonstrate receiving and processing the pre-packaged samples as though the samples were collected and transported from the field. This will include receipt, logging of information, preventing contamination of the laboratory, preventing build-up of background radiation from sample storage, preventing cross contamination, preserving perishable samples, and preparing samples for counting. Radioactive material will not be used to spike samples.

Preparation for analysis will be walk-through or demonstrated (if the time frame of exercise play allows) for pre-packaged environmental samples. The HETL personnel will demonstrate initial counting of the samples; however, full counting periods will be truncated to facilities exercise play. Laboratory staff will discuss with the evaluator appropriate counting times for samples to be processed.

Findings: N/A

EVALUATION 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 pathway EPZ. Specific provisions addressed in this sub-element are further discussed in Section V, Part A of the REP manual, Alert and Notification Systems.

Exhibit III-4: Evaluation Standards for Alert and Notification Systems

Demonstration Criteria:	***In a Timely Manner***	***Within 45 Minutes***	***Within a Reasonable Time***
Primary Alert and Notification			
5.a.1: ...covering essentially 100% of the 10-mile EPZ	*x*		
5.a.4: ...for FEMA-approved exception areas		*x*	
Backup Alert and Notification for All Incidents			
5.a.3: ...covering the 10-mile EPZ			*x*

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)

Extent of Play

Responsible Offsite Response Organizations (ORO) 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 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 messages 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 Nuclear Power Plant 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 populations 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 OROs 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 8 years. All alert and notification activities along the route(s) must be simulated (that is, 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 must demonstrate any means of primary alert and notification included in their plans/procedures as negotiated in the extent of play agreement.

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

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

News Releases will be formulated and distributed by the Maine State EOC. Activation of the EAS system will be coordinated with New Hampshire officials. Actions to demonstrate performance of initial notification of the public will be performed up to the point of actual transmission of the Emergency Alert System (EAS) message. The EAS message will be prepared/ encoded/issued by MEMA. **Broadcast of EAS messages/News Releases will be simulated.**

Findings: N/A

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. (NUREG0654/FEMA-REP-1, E.6; Appendix 3.B.2.c)

Extent of Play

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 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, ***only one route needs to be selected and demonstrated****. All alert and notification activities along the route(s) must be simulated (that is, 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.

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

Maine will utilize its State Emergency Alert Plan.

Findings: N/A

Criterion 5.a.4: Activities associated with FEMA- approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. (NUREG-0654/FEMA-REP-1, E. 6; Appendix 3.B.2.c)

Extent of Play

Offsite Response Organizations (ORO) with FEMA-approved exception areas (identified in the approved Alert and Notification System Design Report) 5 to 10 miles from the nuclear power plant must demonstrate the capability to accomplish primary alerting and notification of the exception area(s). FEMA and the NRC recommend that OROs and operators establish means that will reach those in approved exception areas within 45 minutes once the initial decision is made by authorized offsite emergency officials to notify the public of an incident. The exception area 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.

For exception area alerting, at least one route needs to be demonstrated and evaluated. The selected route(s) should vary from exercise to exercise. However, the most difficult route(s) must be demonstrated no less than once every 8 years. All alert and notification activities along the route(s) must be simulated (that is, the message that would actually be used is read for the evaluator, but not actually broadcasted) as negotiated in the extent of play. Actual testing of the mobile public address system will be conducted at some agreed-upon location. For exception areas alerted by air/water craft, actual routes will be negotiated in the extent of play, but must be demonstrated no less than once every 8 years.

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

Maine Extent of Play - Credit was given for this criterion through demonstration and documentation during the following activities March 2020 Dress Rehearsal, Annual Letters of Certification, Staff Assistance Visits, and the COVID 19 Response.

This criterion is not required by the Maine Radiological Emergency Response Plan.

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 Offsite Response Organizations (ORO) 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 that 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 should 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)

Extent of Play

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 protective action decisions 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 protective action decisions*

provided. The ORO must also be prepared to disclose and explain the Emergency Classification Level (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 pathway measures are exercised, OROs must demonstrate that a system exists for rapid dissemination of ingestion pathway information to pre-determined 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 protective action decisions and other emergency information provided to the public. Copies of pertinent 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 for this criterion 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.

Maine Extent of Play – Day 2 only

Joint Information Center: Information generated as a result of incoming calls to the SEOC Public Information Line/ME 211 Call Center will be included in news briefings. At least two rumor trends will be handled.

State EOC: Control cell personnel will make calls simulating members of the public. The ME 211 Call Center will demonstrate the ability to handle public inquiry calls. Handling at least two rumor trends (three or more calls of the same nature) will be demonstrated. Two ME 211 public information line operators each will respond to calls once the Public Alert and Notification System has been activated at Site Area Emergency or General Emergency at the State EOC.

York County EMA: Control cell personnel will make calls to the local EOCs simulating members of the public. Each local EOC will demonstrate the community's emergency response and refer all other questions to ME 211 Call Center.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

EVALUATION AREA 6: Support Operation/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 Offsite Response Organizations (ORO) 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)

Extent of Play

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 1/3 of the resources (e.g., monitoring teams/instrumentation/portal monitors) available at the facility(ies) as necessary to monitor 20% 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% emergency planning zone (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 individuals per monitoring station 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 in order to determine whether the twelve-hour requirement can be met.

OROs must demonstration 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. 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 decontamination 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 evacuees, provide changes of clothing for those with contaminated clothing; and store contaminated clothing and personal belongings to prevent further contamination of evacuees or facilities. In addition, for any evacuee found to be contaminated, procedures must be discussed concerning the 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 or have been placed in a secure area until they can be monitored and decontaminated, if necessary.

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 being held in a secure area or free from contamination prior to entering the congregate care areas.

Maine Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

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 Offsite Response Organizations (ORO) 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)

Extent of Play

The monitoring staff must demonstrate the capability to monitor emergency worker personnel and their equipment and vehicles for contamination in accordance with the Offsite Response Organizations (ORO) plans/procedures.

Specific attention must be given to equipment, including any vehicles that were in contact 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 OROs 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 2 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 decontamination 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 and uncontaminated individuals where applicable; provide changes of clothing for those with contaminated clothing and personal belongings to prevent further contamination of emergency workers or facilities.

OROs 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 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 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.

All activities associated with this criterion 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.

Maine Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

Note: If, during the exercise, a participant demonstrates this sub-element unsatisfactorily, the FEMA Evaluator will inform the MEMA Controller. After an "on the spot" training by the local or State representative, the FEMA Evaluator will provide another opportunity to re-demonstrate the activity that day.

Sub-element 6.c - Temporary Care of Evacuees

Intent

This sub-element is derived from NUREG-0654/FEMA-REP-1, which requires that Offsite Response Organizations (ORO) 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)

Extent of Play

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 animal and vehicles, where applicable, have been placed in a secured 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 or 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 associated with this criterion 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.

Maine Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

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 Offsite Response Organizations (ORO) 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)

Extent of Play

Monitoring, decontamination, and contamination control efforts must not delay urgent medical care for the victim. FEMA has determined that these capabilities have been enhanced and consistently demonstrated as adequate; therefore, offsite medical services drills need only be evaluated biennially.

Offsite Response Organizations (ORO) must demonstrate the capability to monitor/decontaminate and transport contaminated, injured individuals to medical facilities.

An ambulance must be used for the 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 enroute, 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 defers monitoring to the medical facility, then the ambulance crew presumes that the patient(s) is contaminated and demonstrate appropriate contamination controls until the patient(s) 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 the treatment of contaminated injured individuals.

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

All activities associated with this criterion 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.

Maine Extent of Play

This sub-element will not be demonstrated during this exercise.

Findings: N/A

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