



After Action Report

James A. FitzPatrick Nuclear Power Plant - NY
Radiological Emergency Preparedness Exercise
Exercise Date: 06/23/2019

September 30, 2019



FEMA

Radiological Emergency Preparedness Program

After Action Report

James A. FitzPatrick Nuclear Power Plant - NY

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Table of Contents

	Page
Table of Contents	i
Executive Summary	1
Section 1: Exercise Overview	2
1.1 Exercise Details	2
1.2 Exercise Planning Team Leadership	3
1.3 Participating Organizations	4
Section 2: Exercise Design Summary	5
2.1 Exercise Purpose and Design	5
2.2 Exercise Core Capabilities and Objectives	7
2.3 Exercise Scenario	9
Section 3: Analysis of Capabilities	10
3.1 Exercise Evaluation and Results	10
3.2 Summary Results of Exercise Evaluation	11
3.3 Critical Evaluation Summaries... ..	13
Section 4: Conclusion	14
Appendix A: Key Leaders and Evaluators	16
Appendix B: Exercise Timeline	17
Appendix C: Best Practices	18
Appendix D: Recommendations For Improvement	19

Executive Summary

On June 25, 2019 a plume exercise was conducted in the 10-mile Plume Exposure Pathway Emergency Planning Zone (EPZ) around the James A. FitzPatrick and Nine Mile Point Nuclear Power Plants and evaluated by the Federal Emergency Management Agency (FEMA), Region II. The purpose of the exercise 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 (Radiological Emergency Response Plans) and procedures.

The most recent exercise at this site was conducted on October 24, 2017. The qualifying emergency preparedness exercise was conducted on September 15, 1981.

FEMA wishes to acknowledge the efforts of the many individuals in the State of New York, Oswego and Onondaga Counties who 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.

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 was one Level 2 Finding and one Level 1 Finding identified as a result of this exercise.

Section 1: Exercise Overview

1.1 Exercise Details

Exercise Name

2019 JAF - Plume

Type of Exercise

Plume

Exercise Date

06/25/2019

Program

United States Department of Homeland Security

Federal Emergency Management Agency

FEMA Region II, Radiological Emergency Preparedness Program

Scenario Type

Minimal Release

1.2 Exercise Planning Team Leadership

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1.3 Participating Organizations

State Jurisdictions

- NYS Dept, of Homeland Security and Emergency Services
- NYS Dept. of Health
- NYS Energy Research and Development Authority
- NYS Public Service Commission
- NYS Office of Interoperability and Emergency Communications
- NYS Governor's Office
- NYS Dept. of Environmental Conservation
- NYS Radio Amateur Civil Emergency Services (RACES)
- US Nuclear Regulatory Commission

Risk Jurisdictions

- Oswego County Legislatures
- Oswego County Emergency Management Agency
- James A FitzPatrick (JAF) Nuclear Power Plant
- State University of New York (SUNY)
- Oswego County Sheriff's Department
- Fulton City Fire Department
- RACES

Support Jurisdictions

- Oswego County Fire Department
- Oswego County Police Department
- Oswego County Hospital
- City School District of Oswego

Private Organizations

- Amateur Radio Volunteers
- Exelon - James A. FitzPatrick Nuclear Power Plant
- Exelon - Nine Mile Point Nuclear Power Station

Section 2: Exercise Design Summary

2.1 Exercise Purpose and Design

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and preparedness. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979. FEMA Rule 44 CFR 350 establishes the policies and procedures for FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local governments' participation in joint exercises with licensees.

FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

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

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

Representatives of these agencies serve on the FEMA Region II Regional Assistance Committee (RAC), which is chaired by FEMA.

Formal submission of the Radiological Emergency Response Plans for the James A. FitzPatrick and Nine Mile Point Nuclear Power Plants to FEMA Region II by the New York State and involved local jurisdictions occurred on July 15, 1981. Formal approval of the Radiological Emergency Response Plans was granted by FEMA on February 1, 1985, under 44 CFR 350.

A REP exercise was conducted on June 25, 2019 by FEMA Region II to assess the capabilities of the State and local emergency preparedness organizations in implementing their Radiological Emergency Response Plans and procedures to protect the public health and safety during a radiological emergency involving the James A. FitzPatrick and Nine Mile Point Nuclear Power Plants. The purpose of this exercise report is to present the exercise results and findings on the performance of the offsite response organizations (ORO) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region II RAC Chairperson, and approved by the Regional Administrator.

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

- NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980;
- "Radiological Emergency Preparedness: Exercise Evaluation Methodology," published in the Federal Register on September 12, 2001, and revised April 25, 2002, and contained in the Interim REP Program Manual (January, 2015)

Section III of this report, entitled "Exercise Overview," presents basic information and data relevant to the exercise. This section of the report contains a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

Section 3 of this report, entitled "Analysis and Capabilities," presents detailed information on the demonstration of applicable exercise evaluation at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. Table 3.1 titled, "Summary of Exercise Evaluation" is a tabular representation of exercise criteria.

Section 3 also contains: (1) descriptions of all Level 1 and Level 2 Findings assessed during this exercise, recommended corrective actions, and the State and local governments' schedule of corrective actions for each identified exercise issue and (2) descriptions of unresolved Findings assessed during previous exercises and the status of the OROs' efforts to resolve them.

2.2 Exercise Objectives, Capabilities and Activities

Capabilities-based planning allows for exercise planning teams to develop exercise objectives and observe exercise outcomes through a framework of specific action items that were derived from the Target Capabilities List (TCL). The capabilities listed below form the foundation for the organization of all FEMA Region II REP Program objectives and observations in this exercise.

• **Emergency Operations Center Management:** Is the capability to provide multi-agency coordination (MAC) for incident management by activating and operating an EOC for a preplanned or no-notice event. EOC management includes EOC activation, notification, staffing, and deactivation; management, direction, control, and coordination of response and recovery activities; coordination of efforts among neighboring governments at each level and among local, regional, state, and federal EOCs; coordination of public information and warning; and maintenance of the information and communication necessary for coordinating response and recovery activities.

• **Emergency Public Information and Warning:** Is the capability that includes public information, alert/warning and notification. It involves developing, coordinating, and disseminating information to the public, coordinating officials, and incident management and responders across all jurisdictions and disciplines effectively, under all hazard conditions.

• **Citizen Evacuation and Shelter in Place:** Is the capability to prepare for, ensure communication of, and immediately execute the safe and effective sheltering-in-place of an at-risk population (and companion animals), and/or the organized and managed evacuation of the at-risk population (and companion animals) to areas of safe refuge in

response to a potentially or actually dangerous environment. In addition, this capability involves the safe reentry of the population where feasible.

- **Emergency Public Safety and Security Response:** Is the capability to reduce the impact and consequences of an incident or major event by securing the affected area, including crime/incident scene preservation issues as appropriate, safely diverting the public from hazards, providing security support to other response operations and properties, and sustaining operations from response through recovery. Public Safety and Security Response requires coordination among officials from law enforcement (LE), fire, and EMS.

• **Hazardous Materials Response and Decontamination:** Is the capability to assess and manage the consequences of a hazardous materials release, either accidental or as part of a terrorist attack. It includes testing and identifying all likely hazardous substances onsite; ensuring that responders have protective clothing and equipment; conducting rescue operations to remove affected victims from the hazardous environment; conducting geographical survey searches of suspected sources of contamination and establishing isolation perimeters; mitigating the effects of hazardous materials, decontaminating on-site victims, responders, and equipment; coordinating off-site decontamination with relevant agencies, and notifying environmental, health, and law enforcement agencies having jurisdiction for the incident to begin implementation of their standard evidence collection and investigation procedures.

• **Mass Care:** Is the capability to provide immediate shelter, feeding centers, basic first aid, bulk distribution of needed items, and related services to persons affected by a large-scale incident, including special needs populations. Special needs populations include individuals with physical or mental disabilities who require medical attention or personal care beyond basic first aid. Other special-needs populations include non-English speaking populations that may need to have information presented in other languages. The mass care capability also provides for pet care/handling through local government and appropriate animal-related organizations. Mass care is usually performed by nongovernmental organizations (NGO), such as the American Red Cross (ARC), or by local government-sponsored volunteer efforts, such as Citizen Corps. Special needs populations are generally the responsibility of local government, with medical needs addressed by the medical community and / or its alternate care facilities. State and Federal entities also play a role in public and environmental health by ensuring safe conditions, safe food, potable water, sanitation, clean air, etc.

• **Triage and Pre-Hospital Treatment:** Is the capability to appropriately dispatch EMS resources; to provide feasible, suitable, and medically acceptable prehospital triage and treatment of patients; to provide transport as well as medical care in-route to an appropriate receiving facility; and to track patients to a treatment facility.

2.3 Exercise Scenario

- 0800** - Exercise begins, initial conditions are provided at this time.
- 0805** - High Pressure Coolant Injection (HPCI) inadvertent initiation causes fuel failure.
- 0825** – Total loss of stator water flow. Conditions are met for declaration of an **Alert** based on an anticipated transient without SCRAM (ATWS). Crew should initiate manual SCRAM.
- 0940** – Reactor Cooling System (RCS) leak develops in containment.
- 1010** – Containment radiation levels reach 2000 R/hr. Conditions are met for a **Site Area Emergency (SAE)**, based on a loss of fuel clad barrier and loss of coolant system barrier.
- 1130** – Reactor Water Cleanup system rupture results in an un-isolable leak in secondary containment. **Conditions are met for declaration of a General Emergency (GE). Increase in release rates.**
- 1415** – Terminate onsite exercise.

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 James A. FitzPatrick 06/23/2019 Plume 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

<p>DATE: 06/23/2019</p> <p>SITE: James A. FitzPatrick Nuclear Power Plant - NY</p> <p>M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated</p>	Mobilization	Facilities	Direction and Control	Communications Equipment	Equipment and Supplies to Support Operations
Emergency Operations Management	1a1	1b1	1c1	1d1	1e1
Oswego County - Warning Point	M			L2	
Oswego County Emergency Operations Center	M		M	M	M
New York State Emergency Operations Center	M		M	M	M
Nine Mile Point/Fitzpatrick Joint Information Center	M		M	M	M
EAS Radio Station (WSYR)				M	
Oswego County - Traffic Control Point - Oswego County Sheriff					M
Oswego County - Traffic Control Point - Oswego City Police Department					M
New York State Emergency Operation Center (Watch Center)	M			M	
James A. FitzPatrick Emergency Operations Facility	M		M	M	M
Oswego County - Field Monitoring Team A	M			M	M
Oswego County Dose Assessment					M
Oswego County - Field Monitoring Team B	M			M	M
New York State Dose Assessment					M

<p>DATE: 06/23/2019</p> <p>SITE: James A. FitzPatrick Nuclear Power Plant - NY</p> <p>M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated</p>	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
New York State Emergency Operations Center			M		
Oswego County Emergency Operations Center	M	M	M	M	
Oswego County Dose Assessment	M	M			
New York State Dose Assessment	M	M			
James A. FitzPatrick Emergency Operations Facility		M			

DATE: 06/23/2019 SITE: James A. FitzPatrick Nuclear Power Plant - NY 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
Oswego County Emergency Operations Center	M	M			M	M			
Oswego County - Traffic Control Point - Oswego County	M				M				
Oswego County - Traffic Control Point - Oswego City	M				M				
Oswego County - Field Monitoring Team A	M								
Oswego County - Field Monitoring Team B	M								

<p>DATE: 06/23/2019</p> <p>SITE: James A. FitzPatrick Nuclear Power Plant - NY</p> <p>M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated</p>	Plume Phase Field Measurement and Analyses			Post Plume Phase Field Measurements and Sampling	Laboratory Operations
Field Measurements and Analyses	4a1	4a2	4a3	4b1	4c1
Oswego County Dose Assessment		M			
Oswego County - Field Monitoring Team A			M		
Oswego County - Field Monitoring Team B			M		

<p>DATE: 06/23/2019</p> <p>SITE: James A. FitzPatrick Nuclear Power Plant - NY</p> <p>M: Met, L1: Level 1 Issue, L2: Level 2 Issue, P: Plan Issue, N: Not Demonstrated</p>	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
Nine Mile Point/Fitzpatrick Joint Information Center	L1				M
Oswego County Emergency Operations Center	M				M
EAS Radio Station (WSYR)	M				M
New York State Emergency Operations Center	M				M

3.3 Criteria Evaluation Summaries

3.3.1 State Jurisdictions

3.3.1.1 EAS Radio Station (WSYR)

3.3.1.2 New York State Accident Assessment

3.3.1.3 New York State Emergency Operations Center

3.3.1.4 New York State Warning Point

3.3.1.5 Nine Mile Point/Fitzpatrick Emergency Operations Facility

3.3.1.6 Nine Mile Point/Fitzpatrick Joint Information Center

In summary, the status of DHS/FEMA criteria for the State jurisdiction is as follows:

- a. LEVEL 1 FINDINGS: NONE
- b. LEVEL 2 FINDINGS: NONE
- c. PLAN ISSUES: NONE
- d. PRIOR ISSUES – RESOLVED: NONE
- e. PRIOR ISSUES – UNRESOLVED: NONE

3.3.2 Risk Jurisdictions

3.3.2.1 Oswego County - Backup Route Alerting

3.3.2.2 Oswego County - Field Monitoring Team A

3.3.2.3 Oswego County - Field Monitoring Team B

3.3.2.2 Oswego County - Traffic Control Point - Oswego City Police Department

3.3.2.3 Oswego County - Traffic Control Point - Oswego County Sheriff

3.3.2.6 Oswego County - Warning Point

3.3.2.7 Oswego County Accident Assessment

3.3.2.9 Oswego County Emergency Operations Center

In summary, the status of DHS/FEMA criteria for the Risk jurisdiction is as follows:

- a. a. LEVEL 1 FINDINGS: ONE
- b. LEVEL 2 FINDINGS: ONE
- c. PLAN ISSUES: NONE
- d. PRIOR ISSUES – RESOLVED: NONE
- e. PRIOR ISSUES – UNRESOLVED: NONE

ISSUE 24-19-1d1-L2 - 01

LOCATION: Oswego County Warning Point

CONDITION:

The Alert notification communication from the utility Nuclear Facility Operator (NFO) to the Oswego County Warning Point (OCWP) E-911 was not received via the primary Radiological Emergency Communication System (RECS).

CORRECTIVE ACTION DEMONSTRATED:

At 1149 on June 28, 2019, the Oswego County Warning Point, New York State and the James A. FitzPatrick Emergency Operations Facility successfully redemonstrated the RECS line was fully functional. The RECS line was tested and had light and tone. All three parties were on the line and communications were clear.

ISSUE 24-19-5a1-L1 - 01

LOCATION: Oswego County Joint Information Center

CONDITION:

During the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Radiological Emergency Preparedness Exercise on Tuesday, June 25, 2019, the Joint Information Center, located at 10 Airport Drive, Fulton, New York, 13204, failed to notify and alert the public in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

CORRECTIVE ACTION DEMONSTRATED:

At 0907 on June 28, 2019, the Alert Emergency Classification Notification was successfully redemonstrated to a FEMA evaluator. A call was received from the Joint information Center at the WSYR Radio Station, the Station producer followed procedures and asked to verify the callers name and message verification code. At 0908, the Station producer began recording the message. The message was clear and the message contained all the information elements required. At 0911 the Radio Station Producer simulated broadcasting the message.

Section 4: Conclusion

Based on the results of the exercise, the offsite radiological emergency response plans and preparedness for the State of New York and the affected local jurisdiction of Oswego County is deemed adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public in the event of a radiological emergency. Therefore, 44 CFR Part 350 approval of the offsite radiological emergency response plans and preparedness for the State of New York site-specific to the James A. FitzPatrick Power Plant will remain in effect.

Appendix A: Exercise Key Leaders and Evaluators

Regional Assistance Committee (RAC) Chair: Susan O NEILL

Site Specialist: Miriam Weston

Location	Evaluation Team	Agency
Oswego County Dose Assessment	John Wills	ICF
Oswego County - Field Monitoring Team A	Michael DeBonis	FEMA Region 2
Oswego County - Field Monitoring Team B	Brian Clark	ICF
Nine Mile Point/Fitzpatrick Joint Information Center	Christopher Nemcheck, ,	FEMA Region 3
Nine Mile Point/Fitzpatrick Joint Information Center	Kathryn Duran	FEMA Region 3
Nine Mile Point/Fitzpatrick Joint Information Center	Kimberly Alahmadi	FEMA Region 3
Oswego County Emergency Operations Center	Barbara Thomas	FEMA Region 1
Oswego County Emergency Operations Center	Taneeka Hollins	FEMA Region 1
Oswego County Emergency Operations Center	Joe Suders	FEMA Region 3
Oswego County Emergency Operations Center	Nick Buls	FEMA Region 3
Oswego County Emergency Operations Center	Linda Gee	FEMA Region 6
EAS Radio Station (WSYR)	Kevin Malone	FEMA Region 2
New York State Emergency Operations Center	Christopher Cammarata	FEMA Region 2
New York State Emergency Operations Center	Helen LaForge	FEMA region 1
New York State Emergency Operations Center	Alonzo McSwain	FEMA HQ
Oswego County - Warning Point	Rufus Mobley	FEMA HQ
Oswego County - Traffic Control Point - Oswego County Sheriff	Michele Sturman	FEMA Region 2
Oswego County - Traffic Control Point - Oswego City Police Department	Michele Sturman	FEMA Region 2
New York State Emergency Operation Center (Watch Center)	Tina Thomas	FEMA Region 3
James A. FitzPatrick Emergency Operations Facility	Lisa Rink	FEMA HQ
James A. FitzPatrick Emergency Operations Facility	Jennifer Greene	FEMA Region 3
New York State Dose Assessment	Marcy Campbell	ICF

Emergency Classification Level or Event	Time Utility Declared	APPENDIX B: EXERCISE TIMELINE Time That Notification Was Received or Action Was Taken						
		NY State EOC	NY State Warning Point	EOF Fulton, NY JAF	JIC Fulton, NY JAF	Oswego County EOC	Oswego County 911 Center	EAS Station WSYR
Unusual Event		NA	NA	NA	NA	NA	NA	NA
Alert	8:43	8:45	NA	8:32	9:06	8:46	8:58 9:41	NA
Site Area Emergency	10:02	10:11	NA	10:02	10:03	10:19	NA	11:08
General Emergency	11:50	12:06	NA	11:50	11:53	12:04	NA	NA
Rad. Release Started	11:50	11:45	NA	11:44	11:52	12:01	NA	NA
Rad. Release Terminated		13:27	NA	NA	NA	13:30	NA	NA
Facility Declared Operational	9:40	9:40	NA	9:19	9:22	9:58	NA	NA
Governors State of Emergency Declared		10:35	NA	NA	11:00	11:16	NA	NA
Exercise Terminated		14:12	NA	14:14	14:11	14:20	NA	NA
Early Precautionary Actions		10:18	NA	NA	10:26	10:12	NA	NA
Close Parks and Recreation Areas and Clear Waterways			NA	NA	10:26	10:12	NA	10:25
Release Schools and Daycares			NA	NA	10:26	10:12	NA	10:56
State AG Place Animal on Stored Feed and Grain			NA	NA	NA	NA	NA	NA
“Heads Up” Siren Activation		10:56	NA	NA	10:56	10:56	NA	NA
“Heads Up” EAS message		10:59	NA	NA	10:59	10:59	NA	10:56
<u>1st Protective Action Decision</u>		12:25	NA	12:08	12:25	12:15	NA	NA
2nd Protective Action Decision			NA	NA	NA	NA	NA	NA
Siren Activation		12:36	NA	NA	NA	NA	NA	NA
EAS Message			NA	NA	NA	NA	NA	NA
KI Administration Decisions:		12:25	NA	NA	12:39	12:15	NA	NA
Shelter		NA	NA	NA	NA		NA	NA
Evacuate 1,2,3,4,5,9,10,26,27		NA	NA	12:08	NA	12:15	NA	NA
KI FMT/ERPAs only		NA	NA	13:10	12:39		NA	NA
Siren Activation		NA	NA	NA	12:36	12:36	NA	NA
EAS Message		NA	NA	NA	12:39	12:39	NA	NA

APPENDIX C

BEST PRACTICES

EOF

- The Oswego County Emergency Management Coordinator (EMC) within the EOF did an exceptional job providing up to date, on time accurate information to the Oswego County EOC counterpart. The EMC volunteered his time to provide his expertise to the county for the JAFNPS Plume Exercise as he worked for Madison County (outside the 10-mile EPZ) Emergency Management but understands the Oswego County staffing capabilities and offered his assistance as he was a former employee of Oswego County EMA.

Oswego County EOC

- The Oswego County Director of Emergency Management demonstrated excellent direction and control throughout the exercise by methodically mobilizing staff with real time call outs, providing detailed briefing information to the entire EOC staff taking timely precautionary actions, and making accurate protective action decisions following consultation with County Executives. The Oswego County Director maintained ongoing communications with New York State EOC and consistently relayed and discussed specific actions taken within Oswego County concerning protection of emergency workers and the general public.
- Numerous large placards were placed above all exits, with smaller versions at each work stations, reminding staff to “CONSIDER THE FOLLOWING PEOPLE: Notification of Deaf and Hard of Hearing, Evacuation of Transportation Dependent, and Evacuation of Mobility Impaired.” At every update briefing, the Emergency Management Coordinator directed staff to think forward to potential incident escalations, and begin preparation for notification and assistance to residents with access and functional needs should such escalations occur.

Oswego County RACES

- The RACES Operators were very knowledgeable, trained and experienced in their positions. From start to finish they conducted radio checks to ensure continued operability of all their equipment in support of the EOC.

Oswego County Joint Information Center

- The Oswego County PIO and her staff are to be commended for their knowledge and expertise. Their professionalism should be emulated by all.

APPENDIX D

RECOMMENDATIONS FOR IMPROVEMENT

New York State Dose Assessment

- Consider developing a form to document approval of an increased radiation exposure limit for an emergency worker (above the pre-established 5 rem limit).

JIC

- Reword the KI language to read the following: Adults should ingest two 65mg KI tablets OR read adults should ingest one 130 mg KI...not both.
- When the JIC was informed of the EAS issue, they did not involve RACES or the NWS; the NWS is in their plan. Suggest adding this to the EAS Activator list, since they will be the first person to know if there is an issue – a sentence in the checklist that reads that the in the event of EAS broadcast issues, contact the NWS (with contact info) to broadcast the EAS message would suffice.

Oswego County Dose Assessment

- REP Program Manual page 21: HSPD-5 requires Federal departments and agencies to make the adoption of NIMS by OROs a condition for Federal preparedness assistance through grants, contracts, and other activities. HSPD-5 and PKEMRA do not apply to private sector entities such as NPP licensees. Licensees are encouraged, but not required, to adopt NIMS. However, offsite response concepts (based on ORO plans/procedures) should be coordinated with licensee plans/procedures to ensure effective response and communications between the licensee and OROs. NRC regulations in 10 CFR § 50.47(b)(3) & (b)(6) require licensees to ensure that their programs integrate with those of the OROs.

Although HSPD-5 does not require the adoption of NIMS for those OROs who do not seek Federal preparedness assistance, the integration of NIMS/ICS into ORO emergency plans/procedures for NPPs will provide greater consistency across response jurisdictions and facilitate integration of response elements during an incident that affects a NPP (e.g., HAB incident or catastrophic natural disaster). During such incidents, the OROs would establish Incident Command to facilitate the coordination and subsequent response operations between multi-jurisdictional organizations (i.e., both onsite and offsite organizations).

For incidents involving nuclear power plant radioactive releases, it is likely that a variety of response organizations will be involved from outside the immediate nuclear power plant area, including Federal, State, and other local and non-governmental organizations. Other organizations complying with NIMS will expect documentation utilizing ICS forms. Additional shifts will need to be briefed on actions that occurred during the previous operational period. Additionally, it is expected that all notes and actions taken will be subject to legal requirements of hazardous materials response documentation.

Therefore, it is recommended that each position maintain an ICS 214 form, record information completely and legibly, record times of occurrence, and sign the legal document when relieved by the next shift.

Oswego County Emergency Preparedness Plan Procedure Q

- Update Procedure Q to include James A. FitzPatrick in section 3.1.2

