



Peach Bottom Atomic Power Station Delta, Pennsylvania

Penn Manor School District After Action Report/Improvement Plan

Exercise Date November 30, 2022

Radiological Emergency Preparedness (REP) Program



Published December 29, 2022

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Peach Bottom Atomic Power Station (PBAPS) Remedial School Exercise After Action Report/Improvement Plan

Published Date: December 29, 2022

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EXECUTIVE SUMMARY

On November 30, 2022, a remedial exercise was conducted for the Penn Manor School District and Martic Elementary School. Also participating in the exercise was the Lancaster County Emergency Management Agency (LCEMA). The remedial exercise was required to resolve a deficiency noted in the Penn Manor School District school plans that resulted in a Plan Issue during the April 26, 2022, full participation Plume Exposure Pathway exercise for the 10-Mile Emergency Planning Zone (EPZ) around the Peach Bottom Atomic Power Station (PBAPS) by the U.S. Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA), Region 3. The nature of the Plan Issue was that the school district plans were not in consonance with the Pennsylvania Emergency Management Agency (PEMA) Interim Guidance to Annex E, Appendix 12 "Response by Schools and Colleges."

The findings in this report are based on the evaluations of the Federal evaluation team, with final determinations made by the FEMA, Region 3 Regional Assistance Committee (RAC) Chairperson, and approved by FEMA Headquarters. These reports are provided to the Nuclear Regulatory Commission (NRC) and participating States. State and local governments utilize the findings contained in these reports for the purposes of planning, training, and improving emergency preparedness.

On November 4, 2022, Region 3 received an updated school plan from Penn Manor School District. Upon review of the plan, it was determined to be adequate, however requires further revisions to be in consonance with PEMA's Interim Guidance to Annex E, Appendix 12 "Response by Schools and Colleges" dated January 2022. The school district plan was revised to allow discretion for the Penn Manor School District Superintendent to relocate students and staff at the Site Area Emergency (SAE) emergency classification level (ECL). However, the school district plan still provides for relocation of students and staff at the General Emergency ECL, without the provisions for personal protective equipment (PPE) for bus drivers and monitoring and decontamination of personnel and vehicles, as directed in the PEMA Interim Guidance. The Penn Manor School District and Lancaster County Emergency Management Agency (LCEMA) are aware of the needed plan improvements and are currently working toward updating all plans to be in consonance with the PEMA Interim Guidance document.

The evaluation of this exercise determined that there were no new Level 1 Findings, Level 2 Findings or Plan issues assessed during this exercise. The Plan Issues assessed during the PBAPS biennial exercise remains unresolved until such time that FEMA receives the revised plan with all provisions of the PEMA Interim Guidance document included. The Penn Manor School District successfully redemonstrated the implementation of precautionary and protective actions for schools during the exercise.

A Level 1 Finding is defined by the FEMA Radiological Emergency Preparedness Program Manual as follows: "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)."

A Level 2 Finding is defined as: "An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety."

Finally, a Plan Issue is: "An observed or identified inadequacy in the offsite response organization's (ORO) emergency plan/implementing procedures, rather than that of the ORO's performance."

FEMA wishes to acknowledge the efforts of the many individuals in the Pennsylvania Emergency Management Agency, Lancaster County Emergency Management Agency, Penn Manor School District, and the Martic Elementary School for their participation during this exercise. Cooperation and teamwork of all the participants were evident during the exercise.

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

Section 2, of this report entitled "Exercise Design Summary" includes the "Exercise Purpose and Design," "Exercise Objectives, Capabilities and Activities", and the "Scenario Summary".

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

Section 4 of this report entitled "Demonstrated Strengths" includes exemplary performances that were demonstrated during the exercise and information on best practices that were observed.

Section 5 of this report entitled "Conclusion" presents a summary of the findings and performance of the evaluated agencies.

The appendices, present supplementary information that is relevant to the exercise:

- Appendix A – Exercise Timeline. A table that depicts the times when an event or notifications were noted at participating agencies and locations.
- Appendix B – Exercise Evaluators and Team leaders. A table listing the evaluator names, organizations, and responsibilities of the evaluators and management.
- Appendix C – Acronyms and Abbreviations. An alphabetized table defining the formal names used in this report.
- Appendix D – Extent of Play Agreement

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

Section 2 of this report, entitled Design Summary, and includes the Purpose and Design, Objectives, Capabilities, and Activities, and the Scenario Summary.

Section 3 of this report, entitled Analysis of Capabilities contains detailed Exercise Evaluation and Results; a Summary Results of Evaluation; and Criteria Evaluation Summary. Information on the demonstration for each jurisdiction or functional entity evaluated is presented in a jurisdiction-based, issue-only format.

Section 4 of this report, entitled Conclusion, is a description of FEMA's overall assessment of the capabilities of the participating organizations.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

Penn Manor School District

Type of Exercise

Plume (Remedial)

Drill Date

November 30, 2022

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

Scenario Type

Radiological Release

1.2 Planning Team Leadership

Taylor Griffiths, Project Officer & Site Specialist
Department of Homeland Security (DHS)
Federal Emergency Management Agency (FEMA)
615 Chestnut Street
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Bureau of Technological Hazards
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Harrisburg, Pennsylvania 17110
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1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Peach Bottom Atomic Power Station remedial school exercise:

State Jurisdictions

Commonwealth of Pennsylvania

- Pennsylvania Emergency Management Agency

Risk Jurisdictions

- Lancaster County Emergency Management Agency

Private Organizations

- Penn Manor School District
- Martic Elementary School

SECTION 2: DESIGN SUMMARY

2.1 Purpose and Design

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

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

- A. Taking the lead in offsite emergency planning and in the review and evaluation of radiological emergency response plans and procedures developed by State and local governments;
- B. Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- C. Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated December 7, 2015 (Federal Register, Vol. 81, No. 57, March 24, 2016) and;
- D. Coordinating the activities of the following Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Commerce
 - U.S. Nuclear Regulatory Commission
 - U.S. Environmental Protection Agency
 - U.S. Department of Energy
 - U.S. Department of Health and Human Services
 - U.S. Department of Transportation
 - U.S. Department of Agriculture
 - U.S. Department of the Interior
 - U.S. Food and Drug Administration

Representatives of these agencies serve on the Region 3 Regional Assistance Committee (RAC), which is chaired by FEMA. A Radiological Emergency Preparedness exercise was conducted on November 30, 2022, to assess the capabilities of the school district in implementing their Radiological Emergency Response Plans (RERP) and procedures to protect the public health and safety during a radiological emergency involving Peach Bottom Atomic Power Station.

The purpose of this exercise report is to present the exercise results and findings on the performance of the off-site response organizations (OROs) during a simulated radiological emergency.

The remedial exercise was designed to redemonstrate and evaluate the school district's knowledge of implementation of precautionary and protective actions. This exercise also extends the opportunity for Martic Elementary to participate and satisfy their eight-year cycle participation requirements. All activities were demonstrated in accordance with the participants' plans and procedures as they would be performed in an actual emergency, except as agreed to in the Exercise Plan and Extent-of-Play (EOP) Agreement.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region 3 Regional Assistance Committee (RAC) Chairperson and approved by FEMA Headquarters. These reports are provided to the Nuclear Regulatory Commission (NRC) and participating States. State and local governments utilize the findings contained in these reports for the purposes of planning, training, and improving emergency response capabilities.

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

- NUREG-0654/FEMA-REP-1, Rev. 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," December 2019; and
- Radiological Emergency Preparedness Program Manual, December 2019.

2.2 Objectives, Capabilities and Activities

The Peach Bottom Atomic Power Station Remedial School Exercise evaluated by FEMA was designed to demonstrate that the school district can implementation of precautionary and protective actions during a radiological emergency. The demonstration included the ability to:

- A. Demonstrate the ability to implement protective action decisions, ensuring communication and coordination with all appropriate jurisdictions.
- B. Communicate, coordinate, and implement protective actions for schools.
- C. Communicate with transportation officials.

2.3 Scenario Summary

The scenario began with the first call to the Penn Manor School District that Peach Bottom Atomic Power Station (PBAPS) was at Alert Emergency Action Level (EAL) at 1236. This notification was then confirmed at 1239 by the Penn Manor School District (PMSD) superintendent with Lancaster County Emergency Management Agency (LCEMA). The communications for this exercise were communicated by an exercise player from LCEMA receiving exercise injects from the Pennsylvania Emergency Management Agency (PEMA). The PMSD superintendent proceeded to notify their risk school within the 10-mile Emergency Planning Zone (EPZ) of the event at PBAPS. Both the district and the risk school executed measures in accordance with their plans and procedures for Alert EAL.

The PMSD superintendent received a notification from LCEMA at 1254 and confirmed at 1256 that the incident at PBAPS escalated to a Site Area Emergency (SAE). Both the district and the risk school executed measures in accordance with their plans and procedures for SAE EAL. At 1303, PEMA issued a precautionary action recommendation to relocate students within the 10-mile EPZ. The PMSD received this notification through the LCEMA and executed a relocation of

their children to host schools.

At 1318 a General Emergency was declared at PBAPS with a radiological release. The Governor of the Commonwealth of Pennsylvania recommends all person in the 10-mile EPZ to evacuate. Since the Martic Elementary students and staff were relocated to the designated host school, no further actions were required by the Penn Manor School District.

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Evaluation and Results

Contained in this section are the results and findings of the evaluations of all locations that participated in the November 30, 2022, Peach Bottom Atomic Power Station Remedial School Exercise. The Exercise was conducted to demonstrate the ability of the school district to respond to an event at Peach Bottom Atomic Power Station (PBAPS).

Each location and functional entity were evaluated based on their demonstration of the appropriate Demonstration and Evaluation Guidance contained in the REP Program Manual. Detailed information on the Demonstration and Evaluation Guidance, and the Extent-of-Play Agreement is found in Appendix C.

The exercise was conducted and evaluated in accordance with the Radiological Emergency Preparedness Program Manual (December 2019) and NUREG-0654/FEMA-REP-1, Rev. 2. The Capability Targets included:

1.5 – Protective Action Decision Implementation for the Plume Phase.

3.2 Summary Results of Evaluation

The matrix presented in Table 3.1, on the following page, presents the status of the Capability Target from the 2019 REP Program Manual that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise Demonstration and Evaluation Guidance are listed by number and the demonstration status of the criteria is indicated by the use of the following letters:

- (L1) Level 1 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 event of a radiological emergency to protect the health and safety of the public living in the vicinity of a Nuclear Power Station.
- (L2) Level 2 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.
- (P) Plan Issue: An observed or identified inadequacy in the ORO's emergency plan/implementing procedures, rather than that of the ORO's performance.
- (N) Not Demonstrated: The term applied to the status of a REP Evaluation Area Criterion indicating that the ORO, for a justifiable reason, did not demonstrate the Evaluation Area Criterion, as required in the Extent-of-Play Agreement or at the two-year or eight-year interval required in the FEMA REP Program Manual.
- (M) Met: The status of a REP Evaluation Area Criterion indicating that the participating ORO demonstrated all demonstration criteria for the Evaluation Area Criterion to the level required in the Extent-of-Play Agreement with no findings assessed in the current exercise and no unresolved prior findings.

Table 3.1 – Summary of Drill Evaluation

Date: 2022 November 30 Site: Peach Bottom Atomic Power Station	Capability Targets	Penn Manor School District	Penn Manor Martic Elementary School
(M) Met, (1) Level 1 Finding, (2) Level 2 Finding, (P) Planning Issue			
Objective 1: Emergency Operations Management			
Direction and Control, Facilities, Equipment, Supplies to Support Operations	1.5	M	M

3.3. Criteria Evaluation Summaries

3.3.1 Private Organizations

In summary, the status of DHS/FEMA criteria for the Private Sector Organizations are as follows:

3.3.1.1 Penn Manor School District

- a. Met: 1.5
- b. Level 1 Findings: NONE
- c. Level 2 Findings: NONE
- d. Plan Issues: NONE
- e. Prior Issues – Resolved: NONE
- f. Prior Issues – Unresolved: ONE

3.3.1.2 Penn Manor School District, Martic Elementary School

- a. Met: 1.5
- b. Level 1 Findings: NONE
- c. Level 2 Findings: NONE
- d. Plan Issues: NONE
- e. Prior Issues – Resolved: NONE
- f. Prior Issues – Unresolved: NONE

SECTION 4: CONCLUSION

The Commonwealth of Pennsylvania, Lancaster County Emergency Management Agency, Penn Manor School District, and Martic Elementary School demonstrated knowledge of their radiological emergency response plans and procedures and they were successfully implemented during the Peach Bottom Atomic Power Station Remedial Exercise evaluated on November 30, 2022.

Two FEMA evaluators provided analyses at each location on the relevant Capability Target. These analyses resulted in a determination of no Findings, no new Plan Issues, and no unresolved Plan Issues.

The Penn Manor School District (PMSD) successfully redemonstrated the implementation of precautionary and protective actions for schools during the exercise. The PMSD also demonstrated communication with not only their schools but coordination with all appropriate jurisdictions. The PMSD successfully communicated with their transportation officials to ensure safe one lift of their school children.

The PMSD Martic Elementary School successfully demonstrated the mobilization of staff, their school children, and communication with their superintendent to ensure the safe relocation of the school during this exercise.

On November 4, 2022, Region 3 received an updated school plan from Penn Manor School District. Upon review of the plan, it requires further revisions to be in consonance with PEMA's Interim Guidance to Annex E, Appendix 12 "Response by Schools and Colleges" dated January 2022. The Plan Issue assessed during the PBAPS biennial exercise remains unresolved until such time that FEMA receives the revised plan with all provisions of the PEMA Interim Guidance document included.

Based on the results of the exercise and a review of the offsite radiological emergency response plans and procedures submitted (with the exception stated above), FEMA Region 3 has determined they are adequate (meeting the planning and preparedness standards of NUREG-0654/FEMA-REP-1, Revision 2, December 2019, as referenced in 44 CFR 350.5) and there is reasonable assurance they can be implemented, as demonstrated during this exercise.

An Improvement Plan (IP) will not be developed as part of this report.

APPENDIX A: EVALUATORS AND TEAM LEADERS

The following is the list of Evaluators and Team Leaders for the Peach Bottom Atomic Power Station Remedial School Exercise evaluated on November 30, 2022. The following constitutes the managing staff for the Evaluation:

- Taylor Griffiths, DHS/FEMA, Emergency Management Specialist
- Alexander Hazard, DHS/FEMA, Emergency Management Specialist

DATE: November 30, 2022

SITE: Peach Bottom Atomic Power Station

LOCATION	EVALUATOR	AGENCY
Penn Manor School District	Taylor Griffiths	FEMA R3
Penn Manor School District, Martic Elementary School	Alexander Hazard	FEMA R3

APPENDIX B: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAR	After Action Report
ALARA	As Low As Reasonably Achievable
ALC	Annual Letter of Certification
ANS	Alert and Notification System
BVPS	Beaver Valley Power Station
DHS	Department of Homeland Security
DRD	Direct Reading Dosimeter
EMS	Emergency Medical Services
EOP	Extent of Play
EPZ	Emergency Planning Zone
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Team
GE	General Emergency
IP	Improvement Plan
KI	Potassium Iodide
MS-1	Medical Services
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
PEMA	Pennsylvania Emergency Management Agency
PPE	Personal Protective Equipment
PRD	Permanent Record Dosimeter
RAC	Regional Assistance Committee
REA	Radiation Emergency Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
SAE	Site Area Emergency
SAV	Staff Assistance Visit
SOP	Standard Operating Procedure
TEDE	Total Effective Dose Equivalent

APPENDIX C: EXTENT-OF-PLAY AGREEMENT

The Extent-of-Play Agreement was extracted from the Exercise Plan, which was drafted by Pennsylvania Emergency Management Agency (PEMA) and is included in this report as an Appendix. The Extent-of-Play was negotiated and agreed upon by FEMA Region 3 and PEMA.

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

Method of Operations and Extent-of-Play (EOP)

PEACH BOTTOM ATOMIC POWER STATION **2022 RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE** **Redemonstration – Penn Manor School District**

METHOD OF OPERATION

School Exercise

November 30, 2022

County	School District	Locations
Lancaster	Penn Manor	Administration Martic Elementary

PEMA will provide injects to the county to be used to drive the exercise. County will provide the injects to the school district at the appropriate times and in the manner, they would normally transmit the messages.

Plume Exercise – “Out of Sequence” Activities

PEMA Observers / Controller

PEMA staff will be assigned for the purpose of observing, noting response actions and conditions, and recording observations for future use. Observers will not take an active part but will interact with staff members to the extent necessary to fulfill their observer responsibilities. Coaching of players by observers is not permitted.

PEMA observers will maintain a copy of the injects. In the event the county is unable to provide the injects the PEMA observer can provide them to the district as a backup.

Department of Homeland Security (DHS) Evaluators

Federal evaluators will be present at Penn Manor School District administration and at Martic Elementary School.

County Observer

Lancaster County EMA staff may observe the exercise. Observers will not take an active part but may interact with staff members to the extent necessary to fulfill their observer responsibilities. Coaching of players by observers is not permitted.

Lancaster County will be provided the exercise injects and will submit them to the school district at the appropriate times in the manner the school district would normally receive such messages. The school district may reach back to the county for clarification or to provide exercise information just as they would for a real event.

OBJECTIVE 1 – Emergency Operations Management

Capability Target 1.5: Protective Action Decision Implementation for the Plume Phase (*Vice Sub-Element 3.b.1; 3.c.1; 3.c.2*)

Core Capabilities: Operational Coordination; Public Information and Warning; Environmental Response/Health and Safety; Critical Transportation; Health and Social Services; Housing; Natural and Cultural Resources; Planning

Recommended Evaluation Frequencies: Biennially

Recommended Assessment Activities: Exercise; Drill

Planning Reference: NUREG-0654/FEMA-REP-1, Rev. 2 (A.4, C.2.a, G.1, J.11, J.11.a, J.11.b, J.11.c, J.11.e, J.11.g, and O.1)

Intent: The capability to implement precautionary protective action and/or PADs, including evacuation and/or sheltering, for all populations within the plume and ingestion exposure pathway EPZs. The populations include those with access and functional needs, students, and institutionalized individuals.

Demonstration and Evaluation Guidance:

1. Implement PADs, ensuring communication and coordination with all appropriate jurisdictions.
 - Were resources identified and utilized effectively?
 - Did OROs communicate and work together in an effective manner?
 - What type of coordination occurred on the implementation of protective actions?
 - Was the public kept informed and was the information provided relevant?
 - Were PADs implemented as directed?
 - What types of populations are in the plume exposure pathway EPZ (e.g., institutionalized, access and functional needs, non-English speaking, etc.)? Who is responsible for notifying each, and at what point during the incident?
 - Were there any gaps in resources identified? If so, how were they addressed?
2. Assist those with access and functional needs during the implementation of PADs.
 - What time was the order received for those with access and functional needs?
 - Were the facility/facilities receiving those with access and functional needs listed in the plans?
 - How were individuals with services animals addressed
3. Communicate, coordinate, and implement protective actions for schools.
 - What school districts are located within the plume exposure pathway EPZ?
 - Who notifies school districts? How?
 - What was the protective action that the school took?
 - With regard to processing students, faculty, and staff, what sort of PADs were made?
 - At which ECL were the school districts notified?
 - If students were moved, which reclamation centers were they sent to? Which is the host school?
 - How were parents and/or guardians notified?
 - Are there schools located outside the plume exposure pathway EPZ that have students living within the EPZ? What arrangements are made for those students?
 - What type of transportation was provided to the students (e.g., bus, etc.)?
 - Who notifies the bus drivers?
 - Were there adequate buses available? And how do they communicate with the school?
 - Do the bus drivers know where to take the students? Are they trained on what to do?
 - Was the school evacuated during the plume? What means of monitoring and decontamination were used?
4. Communicate with transportation officials.
 - What transportation needs or resources were required?
 - Was a list of the transportation providers available?
 - Were transportation providers contacted?
 - How were needs for transportation-dependent individuals met?
 - Were designated pick-up points used?
5. Identify evacuation routes for the general public.

- What evacuation routes were selected?
 - Were the direction of the wind/plume and/or other hazardous conditions considered in determining which evacuation routes were used?
 - How was this information communicated to the media and the public?
 - How were alterations to the pre-designated routes communicated to the media and the public?
 - Was the facility evacuated during the plume?
6. Make KI available to both institutionalized persons and the general public, in accordance with plans and procedures.
- How was the decision to take KI disseminated to the public and institutionalized persons?
 - Did the ORO provide KI to the general public and institutionalized persons? If so, how was it distributed?
 - What quantities of KI are available?
 - Where is KI stored?
 - What dosages of KI are available?
 - What is the expiration date of KI? If there is an extended policy, where is the letter certifying the extension?
 - Did the ORO ensure that the KI is stored in a temperature-controlled facility?
 - What information was provided to the general public with regard to KI?
 - What instructions were provided for the use of KI?
 - Did the instructions include dosages and frequency to take KI?
 - Did the instructions include contradictions and side effects of using KI? How was it explained?
 - How was KI ingestion documented for institutionalized persons?
 - Did staff maintain lists of the institutionalized individual who ingested KI?

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.

Pennsylvania Negotiated Extent of Play:

- *School students will not be involved during the exercise. Actions and activities associated with the demonstration will be limited to the School District Administration key personnel and the County. Evacuation of students will be conducted through an interview process with School District personnel or the building principal.*
- *The role of the bus driver may be conducted through an interview with school or transportation officials (or designee) if a bus driver is not available. Actual demonstration of the bus route is not required and will not be demonstrated. Maps or route descriptions will be available for illustration purposes.*
- *Risk County school plans do not require communications between the school and vehicles.*
- *Bus drivers who are prepositioned for evacuation at GE are not considered emergency workers and therefore do not require dosimetry unless returning to the Emergency Planning Zone to fulfill additional relocation requirements.*
- *Private schools, private kindergartens, and day care centers do not participate in REP exercises. However, OROs will be prepared to show evaluators lists of these facilities that they will contact in the event of an emergency in accordance with plans and procedures. Any simulated contacts will be logged.*
- *School district have been encouraged to develop plans that provide for student relocation at Site Area Emergency. However, School Districts, as sovereign entities, may choose to perform student relocations at General Emergency. If a district chooses to relocate at General Emergency their plan must reflect having buses on location ready for immediate relocation of the students in one lift and have plans in place for student monitoring and decontamination if warranted. If school plans allow*

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for relocation at Site Area Emergency the process should not be automatic but done at the advice of the county to prevent unneeded risk during the movement process.

Attachment A

2022 Peach Bottom Atomic Power Station Exercise
Schools Redemonstration

Extent of Play Demonstration Tables

Out of Sequence Exercises

School Districts
FEMA Evaluated

November 30, 2022

- Lancaster County Penn Manor Martic Elementary School