

After Action Report/ Improvement Plan

Exercise Date – September 21 & October 19, 2021

Radiological Emergency Preparedness (REP) Program



D.C. Cook Nuclear Plant



FEMA

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EXECUTIVE SUMMARY

On September 21, 2021, the U.S. Department of Homeland Security Federal Emergency Management Agency (DHS/FEMA) Region V evaluated a Radiological Emergency Preparedness Program (REPP), Full Participation, Plume Exposure Pathway Tabletop Exercise (REPEX) for the D.C. Cook Nuclear Plant (DCCNP) and the State of Michigan and Berrien County. The demonstration activities were evaluated virtually using a Microsoft Teams® software collaboration platform.

As part of the DCCNP REPEX, DHS/FEMA Region V also evaluated an in-person Field Monitoring Operations Demonstration that was conducted out-of-sequence on October 19, 2021, by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Program Support Facility in Lansing Michigan.

The DCCNP is located in Berrien County, with a large portion of the Emergency Planning Zone extending into Lake Michigan.

The purpose of the exercise was to assess the level of preparedness in responding to an incident at the DCCNP. The exercise was conducted in accordance with DHS/FEMA policies and guidance concerning the exercise of state and local radiological emergency response plans and procedures. The previous federally evaluated full-scale exercise for this site was conducted on August 27 and 28, 2019. The qualifying emergency preparedness exercises were conducted on July 16, 1985 and August 8 and 9, 1989.

The DHS/FEMA wishes to acknowledge the efforts of the many individuals and organizations who participated in the exercise and made it a success. Approximately 50 individuals participated in this exercise.

Protecting the public health and safety was 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 on the part of all the participants was evident during this exercise. State and local officials demonstrated knowledge of their emergency response plans and procedures and successfully demonstrated that knowledge. The professionalism and teamwork of the participants was evident throughout all phases of the exercise process.

The ongoing COVID-19 Public Health Emergency and other disasters that occurred during 2020 and 2021 presented the State of Michigan and Berrien County with substantial logistical and communications challenges for simultaneously developing and implementing a successful commercial nuclear power plant exercise plan in a combined virtual and physical environment. The exercise on September 21, 2021 was evaluated virtually using Microsoft Teams® collaboration software. The software platform was configured by the Michigan State Police, Emergency Management & Homeland Security Division, to accommodate players, observers, and evaluators .

This Final After-Action Report/Improvement Plan presents results of the evaluation of the Virtual Tabletop Exercise (TTX) and the in-person Field Monitoring Operations demonstration. The DHS/FEMA evaluation team identified no Level 1 or Level 2 Findings and no Plan Issues for either the State of Michigan or Berrien County. Consequently, all demonstrated criteria were met.

Based on the results of this exercise, the planning and preparedness for the State of Michigan and affected local jurisdictions provide reasonable assurance that appropriate measures can be taken to protect public health and safety. Therefore, Title 44 CFR Part 350 approval, of the offsite radiological emergency response plans and preparedness for the State of Michigan, remains in effect.

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SECTION 1: Exercise Overview

The DHS/FEMA 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 (RERPs) 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 December 7, 2015 (Federal Register, Vol. 82, No. 88, May 9, 2017); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Agriculture;
 - U.S. Department of Commerce;
 - U.S. Department of Energy;
 - U.S. Department of Health and Human Services;
 - U.S. Department of the Interior;
 - U.S. Department of Transportation;
 - U.S. Environmental Protection Agency;
 - U.S. Food and Drug Administration; and
 - U.S. Nuclear Regulatory Commission.

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

A REP Full Participation, Plume Exposure Pathway Exercise for the State of Michigan and Berrien County, was conducted virtually on September 21, 2021, and an in-person, out-of-sequence Field Monitoring Operations Demonstration was conducted on October 19, 2021 to assess the capabilities of state and local offsite emergency preparedness organizations in implementing their plans and procedures to protect the public's health and safety during a radiological emergency involving the D.C. Cook Nuclear Plant. 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 initial scenario documentation for the September 21, 2021, Virtual TTX was received by DHS/FEMA Region V on August 6, 2021, and final documentation was received on August 24, 2021. The scenario documentation for the October 19, 2021, out-of-sequence demonstration of field monitoring activities was received by DHS/FEMA Region V on July 30, 2021. The Final Extent-of-Play Agreement

was received by DHS/FEMA Region V on August 27, 2021. The Scenario and Extent-of-Play Agreements were approved by the DHS/FEMA Region V RAC Chair on August 27, 2021.

The COVID-19 Public Health Emergency resulted in travel and social distancing restrictions which made it necessary to adopt and adapt virtual technologies to conduct the exercise. A virtual exercise platform was developed by the State of Michigan for the Exercise conducted on September 21, 2021. The use of Microsoft Teams[®] collaboration software, supported by email, and cellular telephone voice and text communications, allowed DHS/FEMA evaluation teams to remotely observe demonstration activities at multiple locations and access exercise documentation in real-time. Additional hardcopy exercise documentation was provided electronically by the State of Michigan immediately following the exercise.

This exercise involved approval of Actual Incident Credit for documented local responses to the COVID-19 Public Health Emergency and other declared disasters. The approval of Actual Incident Credit required OROs to submit documentation substantiating demonstration capabilities consistent with NUREG-0654 FEMA-REP-1, Rev. 1, and FEMA P-1028 REP Program Manual guidance. Assessment credit was approved for response actions that met REP Program capability targets and provided reasonable assurance for protecting public health and safety.

Pursuant to the documented and ongoing COVID-19 Public Health Emergency response, the State of Michigan on behalf of Berrien County requested and received Full Actual Incident Credit for the following Demonstration Criteria: 1.a.1, 1.c.1, 1.d.1, 3.c.1, 3.c.2, and 3.d.1. Partial Actual Incident Credit was approved for Demonstration Criteria 1.e.1 and 5.b.1 for Berrien County. Actual Incident Credit for Berrien County was approved by DHS/FEMA Region V via correspondence on July 26, 2021.

In addition, an out-of-sequence Integrated Public Alert & Warning System (IPAWS) / Wireless Emergency Alerts (WEA) Demonstration (Criterion 5.a.1) is scheduled for December 3, 2021. Out-of-sequence demonstrations associated with Brandywine High School (PRC) and River Valley High School (EV-2) (Criteria 6.a.1 and 6.b.1) will be scheduled in CY2022. And, an MS-1 Drill (Criteria 1.e.1, 3.a.1, and 6.d.1) will also be rescheduled to a date to be determined in 2022. The latter was postponed due to the demands of COVID-19 on the hospital to be evaluated.

The findings presented in this report are based on the evaluations of the Federal Evaluation Team, with final determinations made by the DHS/FEMA Region V RAC Chair and approved by the DHS/FEMA Headquarters.

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; and
- FEMA P-1028 REP Program Manual, dated January 2016.

1.1 EXERCISE DETAILS

EXERCISE NAME

D.C. Cook Nuclear Plant Radiological Emergency Preparedness, Full Participation, Virtual Plume Exposure Pathway Exercise, and an Out-of-Sequence In-Person Field Monitoring Operations Demonstration

TYPE OF EXERCISE

Plume Exposure Pathway

EXERCISE DATE

September 21 and October 19, 2021

PROGRAM

Department of Homeland Security/Federal Emergency Management Agency Radiological Emergency Preparedness Program

MISSION

Response

SCENARIO TYPE

Radiological Emergency

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1.3 PARTICIPATING ORGANIZATIONS

Agencies and organizations of the following jurisdictions participated in the exercise:

STATE ORGANIZATIONS

Michigan State Police, Emergency Management & Homeland Security Division
Michigan State Police, Berrien Post
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Michigan Department of Health and Human Services
Michigan Department of Natural Resources
Michigan Department of Agriculture & Rural Development
Michigan Department of Transportation
Office of the State Fire Marshall, Indiana Department of Homeland Security, State of Indiana (Observer)

RISK COUNTY ORGANIZATIONS

Berrien County

Berrien County Board of Commissioners
Berrien County Sheriff's Office of Emergency Management and Homeland Security Division
Berrien County Fire Services
Berrien County Health Department
Berrien County Police Services
Berrien County Public Safety Communications Center
Berrien County Road Department

PRIVATE ORGANIZATIONS

American Electric Power (D.C. Cook Emergency Director) (Observer)

FEDERAL ORGANIZATIONS

Federal Emergency Management Agency/U.S. Department of Homeland Security

SECTION 2: Exercise Design Summary

2.1 EXERCISE PURPOSE AND DESIGN

The U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) administers the Radiological Emergency Preparedness (REP) Program pursuant to the regulations found in Title 44 Code of Federal Regulation (CFR) Parts 350, 351, and 352. Title 44 CFR Part 350 names sixteen planning standards that form the basis for radiological emergency response planning for state, tribal, and local governments impacted by the Emergency Planning Zones (EPZs) established for each nuclear power plant site in the United States. Title 44 CFR Part 350 sets forth the mechanisms for the formal review and approval of state, tribal, and local government radiological emergency response plans and procedures by DHS/FEMA. One of the REP Program requirements established by these regulations is the biennial exercise of offsite response capabilities. During these exercises, DHS/FEMA evaluates state, tribal, and local government plans, procedures, and actions to protect the health and safety of the public in the event of a radiological emergency at a commercial nuclear power plant.

The DHS/FEMA provides a statement with the transmission of this Final After Action Report/Improvement Plan (AAR/IP) to the U.S. Nuclear Regulatory Commission (NRC) that the affected state, tribal, and local plans and preparedness are: (1) adequate to protect the health and safety of the public living in the vicinity of the nuclear power facility by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency; and (2) capable of being implemented. The report and statement are based on the results of this exercise, review of the radiological emergency response plans and procedures, and verification of the periodic requirements set forth in *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,"* November 1980 (NUREG-0654/FEMA-REP-1, Rev. 1) through the annual letter of certification and staff assistance visits.

2.2 FEMA CORE CAPABILITIES AND EXERCISE OBJECTIVES

Core Capabilities-based planning allows for exercise planning teams to develop exercise objectives and observe exercise outcomes through a framework of specific action items. Using the Homeland Security Exercise and Evaluation Program methodology, the exercise objectives meet the Radiological Emergency Preparedness Program requirements and encompass the emergency preparedness evaluation areas. The critical tasks to be demonstrated were negotiated with the State of Michigan and Berrien County. The Core Capabilities demonstrated during this exercise were:

Operational Coordination: Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of Core Capabilities. Enhance and maintain command, control, and coordination structures consistent with the National Incident Management System to meet basic human needs, stabilize the incident, and transition to recovery.

Situational Assessment: Provide all decision makers with decision-relevant information regarding the nature and extent of the hazard, any cascading effects, and the status of the response. Deliver enhanced information to reinforce ongoing lifesaving and life-sustaining activities, and engage governmental, private, and civic sector resources within and outside of the affected area to meet basic human needs, stabilize the incident, and transition to recovery.

Public Information and Warning: Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard and, as appropriate, the actions being taken and the assistance being made available. Deliver credible and actionable messages to inform ongoing emergency services and the public about protective measures and other life-sustaining actions, and facilitate the transition to recovery.

Environmental Response/Health and Safety: Conduct appropriate measures to ensure the protection of the health and safety of the public and workers, as well as the environment, from all-hazards in support of responder operations and the affected communities. Identify, assess, and mitigate worker health and safety hazards, and disseminate health and safety guidance and resources to response and recovery workers. Minimize public exposure to environmental hazards through assessment of the hazards and implementation of public protective actions. Identify, evaluate, and implement measures to prevent and minimize impacts to the environment, natural and cultural resources, and historic properties from all-hazard emergencies and response operations.

On-Scene Security, Protection, and Law Enforcement: Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel engaged in lifesaving and life-sustaining operations. Establish a safe and secure environment in an affected area. Provide and maintain on-scene security and meet the protection needs of the affected population over a geographically dispersed area while eliminating or mitigating the risk of further damage to persons, property, and the environment.

Critical Transportation: Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas. Establish physical access through appropriate transportation corridors and deliver required resources to save lives and to meet the needs of disaster survivors. Ensure basic human needs are met, stabilize the incident, transition into recovery for an affected area, and restore basic services and community functionality.

Operational Communications: Ensure the capacity for timely communications in support of security, situational awareness, and operations, by any and all means available, among and between affected communities in the impact area and all response forces.

Infrastructure Systems: Stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore and revitalize systems and services to support a viable, resilient community. Re-establish critical infrastructure within the affected areas to support ongoing emergency response operations, life sustainment, community functionality, and a transition to recovery. Provide for the clearance, removal, and disposal of debris. This core capability includes the capability to address roadway impediments due to landslides and other events that impair/impede safe evacuation of the public.

The Core Capabilities and their associated Evaluation Criteria, selected for demonstration by the jurisdictions, establish the assessment objectives for the exercise. These Core Capabilities, when successfully demonstrated, meet the exercise objectives.

The objectives for this exercise were as follows:

Objective 1: Demonstrate the ability to provide direction and control and make protective action decisions through the state emergency operations centers, county emergency operations centers, and field activities by discussion of plans and procedures.

Objective 2: Demonstrate the ability to provide protective action decisions affecting state and county Emergency Workers and the public through discussion of plans and procedures.

Objective 3: Demonstrate the ability to implement protective actions for state and county Emergency Workers and the public through discussion of plans and procedures.

Objective 4: Demonstrate the ability to activate the prompt alert and notification system utilizing the primary notification system and the emergency alert system through discussion of plans and procedures.

Objective 5: Demonstrate the effectiveness of plans, policies, and procedures in the joint information centers and the joint information system for public and private sector emergency information communications through discussion of plans and procedures.

Objective 6: Demonstrate the ability to provide protective action decision making for the plume phase.

Objective 7: Demonstrate the capacity for timely communications in support of security, situational awareness, and operations in accordance with the plan, procedures, and Extent-of-Play Agreement, among and between affected communities in the impact area and all response forces.

Objective 8: Demonstrate the capacity to stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore and revitalize systems and services to support a viable, resilient community. Demonstrate the capacity to provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.

Collectively, the jurisdictions successfully demonstrated these eight Objectives and the associated Core Capabilities and Evaluation Criteria selected in accordance with NUREG-0654/FEMA-REP-1 and the REP Program Manual (FEMA P-1028, dated January 2016).

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SECTION 3: Analysis of Capabilities

3.1 EXERCISE EVALUATION AND RESULTS

This section provides a combined assessment of state and local jurisdictions based upon their collective demonstrated performance under the core capabilities associated with the exercise evaluation criteria described in Appendix D, Extent-of-Play Agreements. It employs an integration of the Homeland Security Exercise Evaluation Program and REP Program evaluation methodologies – an analytical process used to assess the demonstration of specific capabilities during an exercise. A capability provides a means to perform one or more critical tasks under specified conditions and to specific performance standards. Core capabilities form the foundation of the National Preparedness System. The REP Program evaluation criteria provide the conditions and performance standards for establishing reasonable assurance that State and Local authorities can protect public health and safety in response to a nuclear power plant accident.

An overall summary of demonstrated capabilities is presented in Section 3.2, Table 3.2-1, of this report. Criteria-specific narrative summaries are presented in Section 3.3 of this report. The narratives summarize observations made pursuant to the REP Program Evaluation Criteria used to assess the organizations and locations that were selected by the State of Michigan and Berrien County. The organizations, locations, and evaluation criteria selected by the State of Michigan and Berrien County are described in Appendix D, Extent-of-Play Agreements. There are two Extent-of-Play Agreements included in Appendix D: one for the September 21, 2021, D.C. Cook Full Participation, Plume Exposure Pathway Exercise (a virtual tabletop exercise) and one for the in -person out-of-sequence Field Monitoring Operations Demonstration conducted on October 19, 2021. Results of these assessments are summarized below by Core Capability.

Operational Coordination: Key leadership personnel established and maintained a unified and coordinated operational structure which provided effective and responsive command, direction and control and coordination within and between the affected jurisdictions to meet basic human needs and stabilize the incident. Critical stakeholders were appropriately integrated within the overall decision-making process, which enabled protective action recommendations to be evaluated in an appropriate and timely manner. This process included input from both relevant critical stakeholders and support personnel and took into account the safety and well-being of Emergency Workers and the general public and protecting property and infrastructure protective action decisions were made without undue delay.

Situational Assessment: Decision makers were provided with decision-relevant information regarding the nature and extent of the simulated radiological and other hazards, any cascading effects, and the status of the response. Berrien County demonstrated proficiency in the radiation levels and the dose projections provided by controller inject. Leadership was prepared to gather and deliver enhanced information to reinforce lifesaving and life-sustaining activities, if needed, and engage governmental and private sector resources within and outside of the affected area to meet basic human needs and stabilize the incident, as necessary.

Public Information and Warning: The jurisdictions as a whole demonstrated the ability to deliver coordinated, prompt, reliable and actionable information to the whole community through the use of clear, consistent and accessible means. Alert and notification of the public and media was completed in a timely manner by simulated means of sounding of sirens, Emergency Alert System messaging, warning in state parks, news releases and media briefings. The simulated release of information via the

aforementioned public information modes was consistent with protective action decisions and contained applicable and specific instructions relative to those decisions.

Environmental Response/Health and Safety: Appropriate measures were taken to ensure the protection of the health and safety of the public and workers, as well as the environment in support of responder operations and the affected communities. The availability of guidance and resources to address hazardous radiological materials was integrated in support of responder operations and the affected communities. Leadership identified, assessed, and mitigated worker health and safety hazards and disseminated health and safety guidance and resources to responders in accordance with the scenario, plans and procedures, and the extent-of-play agreement.

On-Scene Security and Protection: State and local law enforcement agencies demonstrated the capability to ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel who could have been directed to engage in lifesaving and life-sustaining operations. The implementation of traffic and access control was appropriately assessed and coordinated in a timely manner.

Critical Transportation: Officials demonstrated the capability to provide infrastructure access and accessible transportation services for response priority objectives, including the evacuation of people and animals and the delivery of vital response personnel, equipment, and services into the affected areas.

Operational Communications: Each applicable organization and location demonstrated the capacity for timely communications in support of security, situational awareness, and operations by primary and backup means, the ability to communicate with both the emergency response community and the affected populations, and to establish interoperable communications between Federal, state, and local all response groups and locations and between affected communities in the impact area.

Infrastructure Systems: Officials demonstrated the capability to stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore systems and services.

3.2 EXERCISE EVALUATION AND RESULTS

Table 3.2-1 present the results and findings of the evaluation of all jurisdictions and functional entities that participated in the Radiological Emergency Preparedness Program (REPP), Full Participation, Plume Exposure Pathway Tabletop Exercise (REPEX) for the D.C. Cook Nuclear Plant, for the State of Michigan and Berrien County, as well as an in-person out-of-sequence Field Monitoring Operations Demonstration.

Each jurisdiction and functional entity was evaluated based on their demonstration of Core Capabilities and their equivalent REP Evaluation Criteria, as delineated in the FEMA REP 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:

- M: Met (no unresolved Level 1 or Level 2 Findings were assessed, and there were no unresolved Findings from prior exercises)
- NA: Not Applicable
- NS: Not Selected (the criterion was not selected for demonstration)
- FC: Full Actual Incident Credit Received
- PC: Partial Actual Incident Credit Received.

Table 3.2-1 – Summary of Exercise Evaluation – State of Michigan and Berrien County, and the Michigan Department of Environment, Great Lakes, and Energy Field Monitoring Operations Demonstration

DATE: September 21 and October 19, 2021 SITE: D.C. Cook Nuclear Plant M: Met NA: Not Applicable NS: Not Selected FC: Full Credit (Actual Incident) PC: Partial Credit (Actual Incident)	CRITERION	State of Michigan	Berrien County	Field Monitoring Ops. Demo. - OoS
Emergency Operations Management				
Mobilization	1a1	M	FC	M
Facilities	1b1	NS	NS	NS
Direction and Control	1c1	M	FC	M
Communications Equipment	1d1	M	FC	M
Equipment and Supplies to Support Operations	1e1	M	PC	M
Protective Action Decision-Making				
EW Exposure Control Decisions	2a1	M	M	M
PARs	2b1	M	M	NA
PADs	2b2	M	M	NA
PADs for Disabled/Functional Needs	2c1	M	M	NA
Ingestion PADs	2d1	NS	NS	NA
RRR Decisions	2e1	NS	NS	NA
Protective Action Implementation				
EW Exposure Control Implementation	3a1	NS	NS	M
KI Public/Institutionalized	3b1	M	M	NA
PAD Implementation Disabled/Functional Needs	3c1	NA	FC	NA
PAD Implementation Schools	3c2	NA	FC	NA
TACP Establishment	3d1	M	FC	NA
Impediments	3d2	NA	M	NA
Implement Ingestion PADs	3e1	NS	NS	NA
Ingestion Pathway Decisions	3e2	NS	NS	NA
Implementation of RRR Decisions	3f1	NS	NS	NA
Field Measurement and Analysis				
RESERVED	4a1	NA	NA	NA
Field Team Management	4a2	NS	NA	M
Field Team Operations	4a3	NS	NA	M
Field Team Sampling	4b1	NS	NA	NS
Laboratory Operations	4c1	NS	NA	NS
Emergency Notification and Public Info				
Initial Alert & Notification	5a1	M	NS	NA
RESERVED	5a2	NA	NA	NA
Backup Alert & Notification	5a3	NA	NS	NA
Exception Area Alerting	5a4	NA	NA	NA
Subsequent Information & Instructions	5b1	M	PC	NA
Support Operations and Facilities				
Reception Center Operations	6a1	NA	NS	NA
EW Monitoring & Decontamination	6b1	NS	NS	NS
Congregate Care	6c1	NA	NS	NA
Contaminated Injured Transport & Care	6d1	NS	NS	NA

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3.3 JURISDICTIONAL SUMMARY OF EXERCISE EVALUATION RESULTS

Sections 3.3.1 and 3.3.2 present a summary of the Evaluation Criteria and Core Capabilities that were demonstrated by the State of Michigan and Berrien County Emergency Operations Center (EOC) staff during the Virtual Tabletop Exercise conducted on September 21, 2021.

Section 3.3.3 presents a summary of the Evaluation Criteria and Core Capabilities that were demonstrated during Out-of-Sequence Field Monitoring Operations on October 19, 2021. These operations that were carried out in-person at the State of Michigan Department of Environment, Great Lakes, and Energy (EGLE) Program Support Facility in East Lansing, Michigan, and in the surrounding area, as described in Appendix D, Extent-of-Play Agreements. Results of the assessments are summarized in Table 3.2-1.

3.3.1 State of Michigan EOC

The State of Michigan did not request Actual Incident Credit and fully demonstrated all applicable Demonstration Criteria.

Criterion 1.a.1 – Mobilization

Core Capability: Operational Communications

Criterion 1.c.1 – Direction and Control

Core Capability: Operational Communications

Core Capability: Operational Coordination

Core Capability: Situational Assessment

Criterion 1.d.1 – Communications Equipment

Core Capability: Operational Communications

Criterion 1.e.1 – Equipment and Supplies to Support Operations

Core Capability: Environmental Response/Health and Safety

Core Capability: Mass Care Services

Core Capability: Public Health, Healthcare, and Emergency Medical Services

Criterion 2.a.1 – Emergency Worker Exposure Control Decisions

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Criterion 2.b.1 – Protective Action Recommendations

Core Capability: Environmental Response/Health and Safety

Core Capability: Intelligence and Information Sharing

Core Capability: Operational Coordination

Core Capability: Operational Communications

Core Capability: Situational Assessment

Criterion 2.b.2 – Protective Action Decisions

Core Capability: Operational Coordination

Core Capability: Intelligence and Information Sharing
Core Capability: Environmental Response/Health and Safety
Core Capability: Operational Communications
Core Capability: Situational Assessment

Criterion 2.c.1 – Protective Action Decisions for Disabled/Functional Needs

Core Capability: Operational Coordination
Core Capability: Operational Communications
Core Capability: Situational Assessment

Criterion 3.b.1 – KI for the General Public and Institutionalized Populations

Core Capability: Operational Coordination
Core Capability: Public Information and Warning
Core Capability: Environmental Response/Health and Safety
Core Capability: Public and Private Services and Resources

Criterion 3.d.1 – Traffic and Access Control Point Establishment

Core Capability: Operational Coordination
Core Capability: Critical Transportation
Core Capability: On-Scene Security, Protection, and Law Enforcement

Criterion 5.a.1 – Initial Alert & Notification

Core Capability: Public Information and Warning
Core Capability: Operational Coordination
Core Capability: Operational Communications

Criterion 5.b.1 – Public Information & Emergency Instructions

Core Capability: Public Information and Warning
Core Capability: Operational Communications

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for the State of Michigan is as follows:

- a. MET: All Core Capabilities and Evaluation Criteria identified in the DHS/FEMA-approved extent-of-play agreement.
- b. LEVEL 1 FINDINGS: NONE
- c. LEVEL 2 FINDINGS: NONE
- d. PLAN ISSUES: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

3.3.2 Berrien County EOC

Pursuant to the documented and ongoing COVID-19 Public Health Emergency response, Berrien County requested and received Full Actual Incident Credit for Demonstration Criteria 1.a.1, 1.c.1, 1.d.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Actual Incident Credit for Demonstration Criteria 1.e.1 and 5.b.1. Actual Incident Credit for Berrien County was approved by DHS/FEMA Region V via correspondence on July 26, 2021.

Criteria selected for partial or full demonstration are as follows: 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.b.1, and 3.d.2.

Criterion 2.a.1 – Emergency Worker Exposure Control Decisions

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Criterion 2.b.1 – Protective Action Recommendations

Core Capability: Operational Coordination

Core Capability: Intelligence and Information Sharing

Core Capability: Environmental Response/Health and Safety

Core Capability: Operational Communications

Core Capability: Situational Assessment

Criterion 2.b.2 – Protective Action Decisions

Core Capability: Operational Coordination

Core Capability: Intelligence and Information Sharing

Core Capability: Environmental Response/Health and Safety

Core Capability: Operational Communications

Core Capability: Situational Assessment

Criterion 2.c.1 – Protective Action Decisions for Disabled and Functional Needs

Core Capability: Operational Coordination

Core Capability: Operational Communications

Core Capability: Situational Assessment

Criterion 3.b.1 – KI for the General Public and Institutionalized Populations

Core Capability: Operational Coordination

Core Capability: Public Information and Warning

Core Capability: Environmental Response/Health and Safety

Core Capability: Public and Private Services and Resources

Criterion 3.d.2 – Impediments to Evacuation

Core Capability: Operational Coordination

Core Capability: Critical Transportation

Core Capability: Critical Infrastructure Systems

Criterion 5.b.1 – Public Information and Instructions

Core Capability: Public Information and Warning

Core Capability: Operational Coordination

Core Capability: Operation Communications

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for the Berrien County is as follows:

- a. MET: All Core Capabilities and Evaluation Criteria identified in the DHS/FEMA-approved extent-of-play
- b. LEVEL 1 FINDINGS: NONE
- c. LEVEL 2 FINDINGS: NONE
- d. PLAN ISSUES: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

3.3.3 Field Monitoring Operations Demonstration

Criterion 1.a.1 – Mobilization

Core Capability: Operational Communications

Criterion 1.c.1 – Direction and Control

Core Capability: Operational Communications

Core Capability: Operational Coordination

Core Capability: Situational Assessment

Criterion 1.d.1 – Communications Equipment

Core Capability: Operational Communications

Criterion 1.e.1 – Equipment and Supplies to Support Operations

Core Capability: Environmental Response/Health and Safety

Core Capability: Mass Care Services

Core Capability: Public Health, Healthcare, and Emergency Medical Services

Criterion 2.a.1 – Emergency Worker Exposure Control Decisions

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Criterion 3.a.1 – Emergency Worker Exposure Control Implementation

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Criterion 4.a.2 – Emergency Worker Exposure Control Decisions

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Criterion 4.a.3 – Emergency Worker Exposure Control Decisions

Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for the Field Monitoring Operations Demonstration is as follows:

- a. MET: All Core Capabilities and Evaluation Criteria identified in the DHS/FEMA-approved extent-of-play agreement.
- b. LEVEL 1 FINDINGS: NONE
- c. LEVEL 2 FINDINGS: NONE
- d. PLAN ISSUES: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

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SECTION 4: Conclusion

The DHS/FEMA evaluation team identified no Findings and no Plan Issues for the State of Michigan and Berrien County during the September 21, 2021, D.C. Cook Exercise. Likewise, the DHS/FEMA evaluation team identified no Findings and no Plan Issues for the State of Michigan during the October 19, 2021, Field Monitoring Operations Demonstration.

The ongoing COVID-19 Public Health Emergency and other disasters that occurred during 2020-2021 presented the State of Michigan and Berrien County with substantial logistical and communications challenges for simultaneously developing and implementing a successful commercial nuclear power plant exercise. The response to these challenges and the results of the exercise are discussed in Appendix A of this After Action Report/Improvement Plan.

Based on the results of this exercise, the planning and preparedness for the State of Michigan and affected local jurisdictions provide reasonable assurance that appropriate measures can be taken to protect public health and safety. Therefore, Title 44 CFR Part 350 approval, of the offsite radiological emergency response plans and preparedness for the state of Michigan, remains in effect

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APPENDIX A: Improvement Plan

This Appendix summarizes the results from the of the evaluation of all jurisdictions and functional entities that participated in the September 21, 2021, D.C. Cook Nuclear Plant (DCCNP), Radiological Emergency Preparedness (REP) Full Participation, Plume Exposure Pathway Exercise and the October 19, 2021 Field Monitoring Team (FMT) Demonstration to evaluate State and County emergency response capabilities within the 10-mile Emergency Planning Zone surrounding DCCNP, communicate recommended corrective actions, and provide a schedule of corrective actions, if necessary, for the identified primary responsible agency.

The U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) Evaluation Team identified no Level 1 or Level 2 Findings and no Plan Issues for the State of Michigan and Berrien County during the 2021 virtual DCCNP Exercise and in-person FMT demonstration.

The ongoing COVID-19 Public Health Emergency, and other disasters that occurred during 2020-2021, presented the State of Michigan and Berrien County with substantial logistical and communications challenges for simultaneously developing and implementing a successful commercial nuclear power plant exercise plan in a combined virtual and physical environment. Travel and social distancing restrictions made it necessary to adopt and adapt virtual technologies to conduct the exercise and assess certain demonstration activities remotely.

Best Practices

The September 19, 2021, Table Top Exercise was evaluated virtually using Microsoft Teams[®] collaboration software platform. The software platform was configured by the State of Michigan (Michigan State Police) to establish controlled access with audio/visual, chat, and exercise-related document sharing features. Electronic mail and cellphone voice and texting modalities were also available to support the exercise, if needed [cellphone and texting were not needed]. The use of computer-based audio-visual collaboration software and email voice and text communications allowed the DHS/FEMA evaluation teams to remotely observe demonstration activities and access exercise documentation in real-time.

This exercise also involved approval of REP Actual Incident Credit for documented state and local response to the COVID-19 Public Health Emergency and other declared disasters. The approval of Full and Partial Actual Incident Credit required Offsite Response Organizations to submit documentation substantiating demonstration capabilities consistent with NUREG-0654 FEMA- REP-1, Rev. 1, and FEMA P-1028 REP Program Manual guidance. Assessment credit was approved for response actions that met REP Program capability targets and provided reasonable assurance for protecting public health and safety.

Communication with, and coordination within, the two observed FMTs were deemed to be outstanding and timely and revealed a detailed understanding of roles and processes throughout the FMT Demonstrations.

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APPENDIX B: Exercise Evaluation Team

SITE: D.C. Cook Nuclear Plant

EXERCISE DATE: September 21 and October 19, 2021

Exercise Management	Name	Agency/ Organization
Chair, Regional Assistance Committee	Sean O’Leary	DHS/FEMA
Exercise Director	Carl Bebrich	DHS/FEMA
Assistant Exercise Director	Stephen Tulley	DHS/FEMA
Michigan Site Specialist	Debra Schneck	DHS/FEMA
Team Lead – State of Michigan	Todd Gemskie	DHS/FEMA
Team Lead – Berrien County	Brett Beardsley	DHS/FEMA
Team Lead / Regional Coordinator – Field Monitoring Team Demo	John Wills	ICFI

State of Michigan		
State of Michigan – EOC	John Wills	ICFI
State of Michigan – EOC	Curtis Williams	DHS/FEMA
State of Michigan – EOC	Todd Lawson	DHS/FEMA
State of Michigan – EOC – Public Information	Meg Swearingen	ICFI

Berrien County		
Berrien County – EOC	Karl Rabenhorst	DHS/FEMA
Berrien County – EOC	James Hickey	ICFI
Berrien County – EOC – Emergency Worker Exposure Control	Meg Swearingen	ICFI

Field Monitoring Operations		
Field Team Center– Field Team Center	Thomas Essig	ICFI
Field Monitoring Team 1	Dennis Wilford	ICFI
Field Monitoring Team 2	Thomas Gahan	ICFI
Field Monitoring Operations (Observer)	Carl Bebrich	DHS/FEMA
Field Monitoring Operations (Observer)	Debra Schneck	DHS/FEMA

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APPENDIX C: Acronyms and Abbreviations

ACRONYM	DESCRIPTION
AAR	After Action Report
AAR/IP	After Action Report/Improvement Plan
AEP	American Electric Power
ACP	Access Control Point
ANS	Alert and Notification System
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
COVID-19	Coronavirus disease 2019 (COVID-19) - an infectious disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)
DCCNP	D.C. Cook Nuclear Plant
DHS	Department of Homeland Security
DOT	Department of Transportation
DRD	Direct-Reading Dosimeter
EAS	Emergency Alert System
ECL	Emergency Classification Level
EDRD	Electronic Direct-Reading Dosimeter
EDT	Eastern Daylight Time
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EMA	Emergency Management Agency
EMD	Emergency Management Director
EMHSD	Emergency Management & Homeland Security Division
EMS	Emergency Medical Services
EOC	Emergency Operation Center
EOP	Emergency Operations Plan
EoPA	Extent-of-Play Agreement
EPA	Environmental Protection Agency
EPD	Electronic Personal Dosimeter
EPZ	Emergency Planning Zone
ESF	Emergency Support Function
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
FMT / FMT1 / FMT2	Field Monitoring Team / Field Monitoring Team 1 / Field Monitoring Team 2
FRMAC	Federal Radiological Monitoring and Assessment Center
FTC / FTCC	Field Team Center / Field Team Center Coordinator
GE	General Emergency
GAR	Governor's Authorized Representative

UNCLASSIFIED
Radiological Emergency Preparedness (REP) Program

Final After Action Report/Improvement Plan

D.C. Cook Nuclear Plant

ACRONYM	DESCRIPTION
GIS	Geographic Information System
GIS	Geographic Information System
HP	Health Physicist
IP	Improvement Plan
HEMS	Health Emergency Medical Services
IPAWS	Integrated Public Alert and Warning System
JIC	Joint Information Center
KI	Potassium Iodide
MCIMS	Michigan Critical Incident Management System
MDARD	Michigan Department of Agriculture & Rural Development
MDEQ	Michigan Department of Environmental Quality
MDHHS	Michigan Department of Health & Human Services
MDOT	Michigan Department of Transportation
MEMP	Michigan Emergency Management Plan
MHz	Megahertz
mR	milliRoentgen
MS-1	Medical Service Drill
MSP	Michigan State Police
NGO	Non-Governmental Organization
NRC	U.S. Nuclear Regulatory Commission
ORO	Offsite Response Organization
OSL / OSLD	Optically-Stimulated Luminescence / Optically-Stimulated Luminescence Dosimeter
PAA	Protective Action Area
PAD	Protective Action Decision
PAG	Protective Action Guide
PAO	Protective Action Order
PAR	Protective Action Recommendation
PIO	Public Information Officer
PPE	Personal Protective Equipment
PRD	Permanent Record Dosimeter
PSF	Program Support Facility (EGLE)
R	Roentgen
RAC	Regional Assistance Committee
RASCAL	Radiological Assessment System for Consequence Analysis
rem	radiation exposure man
REP / REPP	Radiological Emergency Preparedness / Radiological Emergency Preparedness Program
RERP	Radiological Emergency Response Plan
RETCO	DOT Regional Emergency Transportation Coordinator
14	Relocation, Reentry and Return

UNCLASSIFIED
Radiological Emergency Preparedness (REP) Program

Final After Action Report/Improvement Plan

D.C. Cook Nuclear Plant

ACRONYM	DESCRIPTION
SAA	State Accident Assessor
SAE	Site Area Emergency
SAE	Site Area Emergency
SDA	State Dose Analyst
SEOC	State Emergency Operations Center
TACP	Traffic and Access Control Point
TED / TEDE	Total Effective Dose / Total Effective Dose Equivalent
TTX	Tabletop Exercise
VNPP	Virtual Nuclear Power Plant
WEA	Wireless Emergency Alerts

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APPENDIX D: Extent-of-Play Agreements

STATE OF MICHIGAN AND BERRIEN COUNTY

D.C. COOK NUCLEAR PLANT RADIOLOGICAL EMERGENCY PREPAREDNESS FULL PARTICIPATION PLUME EXPOSURE PATHWAY EXERCISE EXTENT-OF-PLAY AGREEMENT

SEPTEMBER 21, 2021

D.C. Cook REP Exercise Objectives September 21, 2021

Extent of Play Agreement for Berrien County and the State of Michigan

Note: Exercise schedule and the manner in which the exercise would be conducted were made during COVID-19 protective actions. The manner in which the exercise would be conducted was decided with the assumption that some restrictions would be in place regardless of whether they were actually in place by SEPT 21. Regardless of the level of protective orders in place, it is anticipated that some level of prudence will still be necessary during what is normally influenza season to ensure the SARS-COV-2 virus does not begin to spread to pandemic levels into 2022. Berrien County is limiting the number of exercise participants to only those who are necessary and to a number that is as low as reasonably achievable. This exercise is classified as a tabletop exercise.

Criteria:

Criteria that will be demonstrated during this exercise and can be re-demonstrated immediately for credit, include the following: 3.a.1, 3.b.1, 3.d.1, 6.d.1.

Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Regional Assistance Committee (RAC) Chair, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1, 5.b.1.

Criteria that are not evaluated for this exercise include the following: 1.a.1, 2.d.1, 2.e.1, 3.c.1, 3.c.2, 3.e.1, 3.e.2, 3.f.1, 5.a.3, 5.a.4, 6.a.1, 6.b.1, 6.c.1.

Evaluation Area 1 - Emergency Operations Management

Criterion 1.a.1: Offsite Response Organizations (ORO)s use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.

State of Michigan

1. This criterion will be demonstrated through a discussion-based interview.

Berrien County

Actual incident credit has been approved.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

State of Michigan

1. The SEOC and is maintained in operational readiness and set up will not be demonstrated. The state was evaluated in 2019 due in 2027.
2. The FTC/WDC was evaluated in 2015 due in 2023.
3. The JIC and is maintained in operational readiness and set up will not be demonstrated. The state was evaluated in 2014 due in 2022.
4. The Department of Environment, Great Lakes, and Energy (EGLE) Laboratory located at 815 Filley St., Lansing, Michigan is maintained in operational readiness and set up will not be demonstrated. The Laboratory was evaluated in 2019 due in 2027.

Berrien County

1. The EOC is maintained in operational readiness and will not be demonstrated for evaluation.
2. Public Reception Centers, Emergency Worker Decontamination Centers, and Congregate Care Centers will not be demonstrated for this exercise due to the COVID-19 pandemic.

3. Public Reception Center BRANDYWINE HIGH SCHOOL will be set to occur in 2022, date **TBD**.
4. EV-2 RIVER VALLEY HIGH SCHOOL will be set to occur in 2022, date **TBD**.
5. All other facilities have been exercised within the past 8 years.

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.

State of Michigan

1. This criterion will be demonstrated through a discussion-based interview
2. This criterion will be demonstrated by state personnel at the SEOC, by State Liaison Officers at county EOCs, and state personnel at the JIC.

Berrien County

Actual incident credit has been approved.

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.

State of Michigan

1. This criterion will be demonstrated through a discussion-based interview.
2. This criterion will be demonstrated by the SEOC and the JIC. If both the primary and back-up systems fail, this objective may be demonstrated by successful use of an alternate method of communication.

Berrien County

Actual incident credit has been approved.

Criterion 1.e.1: Equipment, maps, displays monitoring instruments, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.

State of Michigan

1. This criterion will be demonstrated through a discussion-based interview.
2. Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the SEOC, JIC, State Liaison Officers at County EOCs, and out-of-sequence events.
3. Additional supplies of potassium iodide are stored at the Michigan State Police Emergency Management and Homeland Security Division (MSP/EMHSD) office in Dimondale. These supplies are meant to augment the county supplies.
4. Calibration records will be provided for equipment calibrated by EGLE for the current calendar year.
5. Additional monitoring instruments are stored at the EGLE facility located at 815 Filley Street in Lansing.

Berrien County – Partial Credit Received

1. After Partial Incident Credit for COVID19 was given, the RAC Chair determined the following element WAS NOT demonstrated through COVID19 response and remains to be demonstrated in this Exercise: “Provide the current Berrien County inventory of dosimetry equipment and potassium iodide for review, including calibration and exchange dates.”
2. This criterion will be demonstrated after a MS-1 Drill on October 12, 2021 at 0800hrs at Spectrum Health - Lakeland Hospital Saint Joseph has concluded.
3. Potassium iodide, monitors, and dosimetry demonstration of quantities, storage, and maintenance records will be provided to FEMA.
4. Records will be provided to FEMA within the next ALC submission.

Evaluation Area 2 - Protective Action Decision Making

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.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. This criterion will be demonstrated by the Incident Management Group in the SEOC in conjunction with appropriate support staff including the Technical Support Unit (TSU) and the Michigan Department of Health and Human Services (MDHHS).
3. Authorization for State personnel to exceed state exposure limits will be demonstrated by the State Health Physicist, following a controller inject. If the scenario does not provide an opportunity to demonstrate these items, this will be demonstrated through an interview at a time that will not interfere with exercise play to demonstrate the ability to perform these actions.

Berrien County

1. This will be conducted through a discussion-based interview on September 21, 2021.
2. Berrien County may recommend that Emergency Workers ingest KI and/or authorize Emergency Workers to exceed State exposure limits based on best available information, if the incident (intentional vs. unintentional) warrants, and if the State is unable to provide Protective Actions Orders to protect Emergency Workers in a timely manner. All decisions made in the EOC and manner of implementation will be subject to an interview with the Emergency Management Coordinator.

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee.

Criterion 2.b.1: Appropriate Protective Action Recommendations (PARs) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. The Technical Support Unit (TSU) in the SEOC will evaluate technical information (provided by controller inject) and complete an independent analysis.
3. Dose assessment will be conducted as required by the scenario at the SEOC.

Berrien County

1. This will be conducted through a discussion-based interview on September 21, 2021.
2. Berrien County may implement interim protective action decisions prior to a governor's declaration of emergency; especially in cases where people need to be protected from hazards that are not exclusively linked to radiological release (i.e. danger from HAB). All decisions made in the EOC and manner of implementation will be subject to an interview with the Emergency Management Coordinator.
3. Responsibility to implement public KI plan is vested in the State of Michigan, regardless of the state's emergency/disaster declaration status.
4. Evaluation of Berrien County for this criterion is conditional upon the scenario variables. It will only be demonstrated, and therefore evaluated, if the scenario or exercise play results in the need for Berrien County to make a PAD because the State of Michigan is unable or untimely to take command through the Governor's declaration of an emergency. When Berrien County is found not to be responsible for this criterion, it will be recorded as "Not Applicable".

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

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 it is ORO policy).

State of Michigan

1. This will be conducted through a discussion-based interview.
2. This criterion will be demonstrated by the Incident Management Group in the SEOC in conjunction with appropriate support staff including the TSU and the Michigan Department of Health and Human Services (MDHHS).
3. The Potassium Iodide (KI) policy will be demonstrated at the General Emergency declaration through SEOC discussion and a press release at the JIC.

Berrien County

1. This will be conducted through a discussion-based interview on September 21, 2021.
2. Berrien County may implement interim protective action decisions prior to a governor's declaration of emergency. All decisions made in the EOC and manner of implementation will be subject to an interview with the Emergency Management Coordinator.
3. Responsibility to implement public KI plan is vested in the State of Michigan, regardless of the state's emergency/disaster declaration status.
4. Evaluation of Berrien County for this criterion is conditional upon the scenario variables. It will only be demonstrated, and therefore evaluated, if the scenario or exercise play results in the need for Berrien County to make a PAD because the State of Michigan is unable or untimely to take command through the Governor's declaration of an emergency. When Berrien County is found not to be responsible for this criterion, it will be recorded as "Not Applicable".

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

Criterion 2.c.1: Protective Action Decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. This criterion will be demonstrated by the Incident Management Group in the SEOC in coordination with applicable support staff, through the decision to recommend the use of KI to institutionalized persons that cannot be evacuated.

Berrien County

1. This will be conducted through a discussion-based interview on September 21, 2021.
2. Berrien County may implement protective measures prior to a Governor's Declaration to warn and protect the public based on best available information if the incident (intentional vs. unintentional) warrants and if the State is unable to provide Protective Actions Orders to warn and protect the public in a timely manner. All decisions made in the EOC and manner of implementation will be subject to an interview with the Emergency Management Coordinator.

Criterion 2.d.1:

Radiological consequences for the ingestion pathway are assessed and appropriate Protective Action Decisions are made based on the ORO planning criteria.

This criterion will not be evaluated.

Note: This criterion may be re-demonstrated immediately for credit.

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.

State of Michigan

This criterion will not be demonstrated for this exercise as requirements were met in 2019 due in 2027.

Berrien County

This criterion will not be demonstrated for this exercise as requirements were met in 2018 due in 2026.

Evaluation Area 3 - Protective Action Implementation

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to Emergency Workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for Emergency Workers is maintained.

State of Michigan

1. This criterion will be demonstrated out of sequence by the State of Michigan by the Field Team Center (FTC) and Field Monitoring Teams (FMTs) on October 19, 2021.

Berrien County

1. This criterion will be demonstrated during a MS-1 Drill on October 12, 2021 at 0800hrs at Spectrum Health - Lakeland Hospital Saint Joseph.

Note: This criterion may be re-demonstrated immediately for credit.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals and general public is maintained.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. The State will demonstrate this objective at the SEOC and through decision-making and directives to implement appropriate Protective Action Orders.

Berrien County

1. Documentation will be submitted prior to the September 21st exercise.
 - a. The County's inventory of KI will be submitted.
 - b. The public is responsible for obtaining KI from the pharmacy. These actions are not the responsibility of Berrien County.
2. Decision making will be assessed through a discussion-based interview on September 21, 2021.

Note: This criterion may be re-demonstrated immediately for credit.

Criterion 3.c.1: Protective Action Decisions (PADs) are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

State of Michigan

This criterion will not be demonstrated by the State, this is a county function.

Berrien County

Actual incident credit has been approved.

Criterion 3.c.2: OROs/School officials implement protective actions for schools.

State of Michigan

This criterion will not be demonstrated by the State, this is a county function.

Berrien County

Actual incident credit has been approved.

Note: This criterion may be re-demonstrated immediately for credit.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. This criterion will be demonstrated by the SEOC through the simulated restriction of air, interstate, rail, and waterway access.

Berrien County

Actual incident credit has been approved.

Note: This criterion may be re-demonstrated immediately for credit.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

State of Michigan

This criterion will not be demonstrated by the State, this is a county function.

Berrien County

1. This will be conducted through a discussion-based interview on September 21, 2021.
2. This will be demonstrated through discussions and injects at the county EOC. Messages will be injected by Exercise Controllers to drive these demonstrations. Personnel will address the impediments on County highways by discussing the need for equipment, discussing its estimated time of arrival, etc. If the impediment posed involves road closures that would have been known to exercise participants during the course of normal operations, this information will be provided to the players as part of the initial conditions for the exercise. The Controller will notify players when the impediment has been resolved. The JIC is not being demonstrated for this exercise. The Emergency Management Coordinator and County PIO may be interviewed to evaluate the manner in which the public will be informed of re-routes of traffic.

Note: This criterion may be re-demonstrated immediately for credit.

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.

This criterion will not be demonstrated during this exercise.

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.

This criterion will not be demonstrated during this exercise.

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.

State of Michigan

This criterion will not be demonstrated for this exercise as requirements were met in 2019 due in 2027.

Berrien County

This criterion will not be demonstrated for this exercise as requirements were met in 2018 due in 2026.

Evaluation Area 4 - Field Measurement and Analysis Criterion

Criterion 4.a.1: (RESERVED)

Criterion 4.a.2: Field teams (two or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

State of Michigan

This criterion will be demonstrated during the out-of-sequence FTC and FMT demonstration.

Berrien County

This criterion does not apply.

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.

State of Michigan

1. This criterion will be demonstrated during the out-of-sequence FTC and FMT demonstration.

Berrien County

This criterion does not apply.

Criterion 4.b.1: The field teams (two or more) demonstrate the capability to make appropriate measurements and collect appropriate samples (e.g., food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making.

This criterion will not be demonstrated during this exercise.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

State of Michigan

This criterion will not be demonstrated for this exercise as requirements for the Laboratory were met in 2019 due in 2027.

Berrien County

This criterion does not apply.

Evaluation Area 5 - Emergency Notification and Public Information

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.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. The State will provide information to the county for release in the Emergency Alert System messages.

Berrien County

1. This criterion will be demonstrated during a virtual SAV.
 - a. The date of the SAV is currently scheduled for NOV 05, 2021 at 2:30PM Eastern Time. The demonstration is scheduled in conjunction with a scheduled Monthly Test for the County to test WEA at 3:00PM.
 - b. The Emergency Management Coordinator will facilitate a virtual meeting to share the screen used to launch a regularly scheduled WEA test to the public and EAS system.
 - c. The Emergency Management Coordinator will demonstrate the sounding of the WEA test to demonstrate end-to-end testing.

d. Thereafter, the Emergency Management Coordinator will perform a proficiency demonstration in testing mode to send a message template that would be used in an actual emergency. The IPAWS laboratory validation tool will be used to demonstrate the message is formatted properly to activate the live system. That report will be provided to the SAV evaluator. The text of the template will also be provided for evaluation of the message content.

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following detection by the ORO of a failure of the primary alert and notification system.

This criterion will not be demonstrated during this exercise.

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.

The D.C. Cook EPZ does not contain any DHS/FEMA approved exception areas.

This criterion will not be demonstrated during this exercise.

Criterion 5.b.1: OROs provide accurate subsequent emergency information and instructions to the public and the news media in a timely manner.

State of Michigan

1. This will be conducted through a discussion-based interview.
2. This will be demonstrated at the JIC via dissemination of emergency information and instructions through media briefings and news release announcements in coordination with the SEOC and County EOCs. All media briefings will be conducted at the JIC.
3. A public inquiry hotline will be operated by AEP personnel based at the JIC during the exercise. Trending is performed by the Inquiry Response Coordinator, who identifies trends and ensures appropriate information is provided to the inquiry response staff and the JIC for inclusion in press briefings.

Berrien County – Partial Credit Received

1. After Partial Incident Credit for COVID19 was given, the RAC Chair determined the following element WAS NOT demonstrated through COVID19 response and remains to be demonstrated in this Exercise: “Demonstrate the use of pre-scripted messages and the capability to issue messaging for protective actions in accordance with REP guidance; and the capability to monitor media broadcasts and how monitoring information is used.”
2. Pre-scripted messages used for the ANS (IPAWS) system will be evaluated during the SAV as described in 5.a.1.
3. The remaining elements will be conducted through a discussion-based interview on September 21, 2021.

Note: This criterion may be re-demonstrated as approved on a case-by case basis by the Chair of the Regional Assistance Committee.

Evaluation Area 6 - Support Operation/Facilities

Postponed until travel restrictions have been lifted.

Criterion 6.a.1: The reception center facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees.

State of Michigan

This criterion does not apply.

Berrien County

1. Public Reception Centers, Emergency Worker Decontamination Centers, and Congregate Care Centers will not be demonstrated for this exercise due to the COVID-19 pandemic. A date to demonstrate BRANDYWINE HIGH SCHOOL (PRC) and RIVER VALLEY HIGH SCHOOL (EV-2) will be set to occur on a 2022 date TBD. All other facilities have been exercised within the past 8 years.

Note: This criterion may be re-demonstrated immediately for credit.

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.

Postpone until travel restrictions are lifted.

State of Michigan

1. Due to ongoing challenges from the COVID-19 pandemic during the exercise planning period, the WDC will not be demonstrated.

Berrien County

1. Public Reception Centers, Emergency Worker Decontamination Centers, and Congregate Care Centers will not be demonstrated for this exercise due to the COVID-19 pandemic.
2. Public Reception Center BRANDYWINE HIGH SCHOOL will be set to occur in 2022, date TBD.
3. EV-2 RIVER VALLEY HIGH SCHOOL will be set to occur in 2022, date TBD.
4. All other facilities have been exercised within the past 8 years.

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 before entering congregate care facilities.

State of Michigan

This criterion will not be demonstrated by the State, this is a county function.

Berrien County

1. Congregate Care Centers will not be demonstrated for this exercise due to the COVID-19 pandemic.
2. All have been exercised within the past 8 years.

Note: This criterion may be re-demonstrated immediately for credit.

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.

State of Michigan

1. During this exercise EGLE will provide phone support upon request. Phone calls may be simulated through discussions with State personnel who are available in person for the out-of-sequence demonstrations.

Berrien County

1. This criterion will be demonstrated during a MS-1 Drill on October 12, 2021 at 0800hrs at Spectrum Health - Lakeland Hospital Saint Joseph.

Note: This criterion may be re-demonstrated immediately for credit.

STATE OF MICHIGAN

D.C. COOK NUCLEAR PLANT FIELD MONITORING OPERATIONS DEMONSTRATION EXTENT-OF-PLAY AGREEMENT

OCTOBER 19, 2021

**Extent of Play Agreement
for Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Out-of-Sequence Field Operations Demonstration
Tuesday, October 19, 2021**

EXERCISE LOCATION:

This exercise will be held in Lansing, MI and the surrounding area.

A simulated release of radioactive material will occur at a virtual nuclear power plant (VNPP). The use of the VNPP is necessary to accommodate actual geography for the demonstration and will allow the creation of maps using real street names and other landmarks, since the exercise will not be conducted within the D.C. Cook 10-mile Emergency Planning Zone (EPZ). The VNPP will be located at 42°55'19.5"N 84°37'53.2"W, roughly 13.5 miles NNW of the Michigan Capitol. Monitoring routes are predesignated, and appropriate navigational aides have been developed (e.g., maps and turn-by-turn instructions) for use by players.

The Field Team Center (FTC) will be located at the EGLE Program Support Facility located at 815 Filley St., Lansing, MI 48906. Field Monitoring Teams (FMTs) will be based out of the FTC (e.g., this is the location where they will receive equipment, briefings) and will conduct field monitoring operations in the vicinity of the VNPP.

Exercise conduct will be in accordance with current plans and procedures, except as noted in this Extent of Play Agreement. Plans and procedures will not be updated to list the exercise locations as alternate facility locations. However, where appropriate, location-specific maps and navigational aids will be provided.

EXERCISE CONTROLLING AND SIMULATION:

The release of radiation will be simulated. This out-of-sequence demonstration will use a stand-alone scenario, and therefore will not be related to any other scenarios that may be used as part of the overall Cook Exercise. The scenario, including all supporting injects, maps, and documentation will be submitted to FEMA prior to (not less than 60 days before) this out-of-sequence demonstration.

The FTC will be staffed by the FTC Coordinator and by the FTC Dispatcher. The FTC Communicator, who normally communicates with the State Emergency Operations Center (SEOC), will not be in play, as the Field Ops demonstration will be conducted out of sequence – not on the day of the Exercise – and the SEOC will not be in play at that time.

The EGLE Lead Technical Controller (LTC) will serve as the FTC Controller.

A controller and a FEMA Evaluator will be placed with each of the FMTs. FMT data will be fed directly to handheld survey equipment via Teletrix and Virtual Plumes. The computerized systems will be operated by the controllers. If these systems fail, radiation data will be provided by the applicable FMT Controller via inject for the current time at the FMT's current approximate location, as read from radiation data tables.

The Emergency Worker Decontamination Center (WDC) will not be in play. Therefore, all FMT supplies, which would normally be issued from the WDC, will be pre-staged for players at the FTC. FMTs will perform equipment checks, as required by procedures and checklists. FMT activities that would normally take place at the WDC, but cannot be demonstrated without the WDC, will be evaluated via Evaluator Interview.

Personal Protective Equipment (PPE) will be included with the staged supplies. Players will be able to answer questions about the proper use and function of PPE. One player will be selected to demonstrate the proper donning and doffing of PPE, but all players will wear PPE, if they are required to do so by their procedures. If appropriate (e.g., to protect players from overheating), the Evaluator may authorize players to take mitigating actions (e.g., remove extra gloves, unzip Tyvek, etc.) for personal safety and/or comfort. A balance between realism and safety should be sought.

The EGLE Program Support Facility is an active EGLE facility. Daily operations will continue despite the exercise. They are not a part of the exercise.

The FTC Coordinator, FTC Dispatcher, and FMT personnel may be interviewed or questioned by Evaluators regarding their roles and interactions with the WDC, including interactions for Sample Drop-off and Sample Handling.

CRITERIA

Criteria that will be demonstrated during this exercise include the following:

1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 3.a.1, 3.b.1, 4.a.2, and 4.a.3.

Criteria that can be re-demonstrated immediately for credit, include the following:

3.a.1, 3.b.1, and 4.a.3.

Criterion 1.a.1: Offsite Response Organizations (OROs) use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.

- 1) The FTC and two FMTs will be activated.
 - a) Each FMT will have its normal staffing of Driver, Team Leader, and Supplemental.
 - b) The FTC will be minimally staffed by the FTC Coordinator and FTC Dispatcher.
 - c) No other response areas (e.g., Staging Area; WDC) or individuals will be activated for this out-of-sequence demonstration.
- 2) Personnel will be pre-positioned and will begin exercise participation as directed by controller injects.
- 3) The demonstration will take place in the Lansing vicinity on October 19, 2021. Play will begin at 815 Filley Street, Lansing Michigan.
- 4) A roster will be provided to demonstrate 24-hour staffing capability for EGLE.

Criterion 1.b.1: Facilities are sufficient to support the emergency response

- 1) This criterion will not be demonstrated; the demonstration will occur at an alternate location not included in official response locations.

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.

- 1) The FTC Coordinator will provide overall command and control of FMTs, with each FMT commanded in the field by its own respective FMT Leader.

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.

- 1) Communication systems will be used to communicate between the FTC and FMTs per procedures. If both the primary and back-up systems fail, this objective may be met by successful use of an alternate method of communication.
- 2) The use of MI CIMS will not be demonstrated.
- 3) Communication with the WDC will not be demonstrated by the FTC or FMTs. Such communications may be discussed via Evaluator Interview.
- 4) The FTC Dispatcher serves as the communications link between the FTC and FMTs. These communications will be demonstrated per procedures.
- 5) The FTC Comms Officer serves as the communications link between the FTC and State Emergency Operations Center (SEOC). Neither the SEOC nor the Comms Officer will be in play.
 - a) Communications typically initiated by the SEOC will be simulated through pre-defined controller injects which will be included in EGLE's scenario package.
 - b) If the FTC needs or chooses to initiate communication with the SEOC, those communications may be demonstrated through Evaluator Interview, simulation, or by use of controller injects, as appropriate.

Criterion 1.e.1: Equipment, maps, displays monitoring instruments, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations.

- 1) Adequate equipment and supplies will be provided to FMTs and the FTC. Equipment will be staged instead of issued through the usual equipment issuance process.
- 2) Calibration records are supplied as part of the Annual Letter of Certification for the previous calendar year and in accordance with relief approved by the FEMA Region 5 RAC Chair on April 3, 2020. Updated calibration records will be provided to show equipment used for the demonstration are within their calibration periods or are covered by an appropriate waiver.
- 3) Maps appropriate to the geographic area will be provided for use during the exercise, as they are not included within official plans and procedures.
- 4) The EGLE Program Support Facility is EGLE's warehouse for radiological emergency response equipment. Evaluators will be able to observe relevant EGLE equipment present at the facility.

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.

- 1) FMTs and the FTC will demonstrate appropriate exposure control, per plans and procedures. As noted elsewhere, interactions with other facilities and response locations (e.g., the SEOC) will be simulated.
- 2) FMTs are not, under normal circumstances, expected to need to exceed dose limits. However, if this issue does arise during exercise play, it will be handled via Controller Inject or Evaluator Interview, as appropriate, with the FTC Coordinator and FMTs.

Note: The remainder of the Criteria 2.x.x series has not been selected for evaluation and has been omitted from this document for brevity.

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to Emergency Workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

- 1) Adequate equipment and supplies (including dosimetry and KI) will be provided to FMTs and the FTC. Equipment will be staged instead of issued through the usual equipment issuance process.
- 2) Briefings will be conducted by the FTC Coordinator, per procedures.
- 3) Emergency worker doses will be reported to the FTC by the FMTs, per procedures.
- 4) Certain aspects of the Dose Limit Guide require consultation with assessment staff at the SEOC. As the SEOC will not be in play, the FTC Coordinator and FMTs will describe, via interview, their role in the process. Those aspects that are solely the responsibility of the SEOC will not be demonstrated during this exercise.
- 5) The FTC is outside of the virtual 10-mi EPZ for the VNPP; therefore, KI is not required for FTC workers.
- 6) FMTs will be operating within the virtual 10-mi EPZ; therefore, they will demonstrate the use of KI, per procedures, except that the actual ingestion of KI will be simulated.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals and general public is maintained.

- 1) FMTs will simulate taking KI prior to deployment into the field and will fill out appropriate paperwork, per procedures.

Note: The remainder of the Criteria 3.x.x series has not been selected for evaluation and has been omitted from this document for brevity.

Criterion 4.a.2: Field teams (two or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

- 1) This criterion will be demonstrated per procedures, except as indicated elsewhere in this document.
- 2) Radiological releases will be simulated, and data will be provided by simulator and controller inject.
- 3) Monitoring routes appropriate for the exercise location will be used. Appropriate maps and routing information will be provided to players with their equipment and will be submitted to FEMA with the exercise scenario packet.

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.

- 1) All radiological releases will be simulated.
- 2) Radiological data will be provided by controller inject, Virtual Plumes and Teletrix, or other appropriate means.
- 3) Two FMTs will demonstrate the capability to take and record ambient radiation measurements of a simulated airborne plume per procedures.

4) The release point and monitoring routes will be based on a VNPP located at 42°55'19.5"N 84°37'53.2"W.

5) Air samples will be collected and counted by FMTs per applicable procedures.

6) All sample media designated for laboratory analysis is typically relinquished to the WDC by the FMT. However, the WDC will not participate in this demonstration. FMTs will demonstrate the ability to properly fill out a Sample Control Form & Chain of Custody but will not be expected to be knowledgeable about what the WDC does with samples after they are relinquished by the FMT, as that is beyond the scope of an FMT's responsibilities.

Note: The remainder of the Criteria 4.x.x series and all of Criteria 5.x.x and 6.x.x have not been selected for evaluation and have been omitted from this document for brevity.

EXERCISE CONCLUSION:

Once the FEMA evaluator and EGLE LTC agree that all criteria have been demonstrated and any criteria approved for, and needing, redemonstration have been completed, the EGLE LTC will announce the exercise has concluded. At this point, exercise play will stop, and all evaluation activities will cease.

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