

After-Action Report/ Improvement Plan

Exercise Dates – May 18 and 19, 2021

Radiological Emergency Preparedness (REP) Program



Fermi 2 Nuclear Power Plant



FEMA

*FINAL AAR/IP
Published August 13, 2021*

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EXECUTIVE SUMMARY

On May 18 and 19, 2021, the U.S. Department of Homeland Security Federal Emergency Management Agency (DHS/FEMA) Region V evaluated a Radiological Emergency Preparedness Program, Partial-Participation, Plume Exposure Pathway Exercise for the Fermi 2 Nuclear Power Plant (FNPP), including Relocation, Reentry and Return (RRR) for Monroe and Wayne Counties in the Emergency Planning Zone (EPZ). The demonstration activities were evaluated virtually using a Microsoft Teams® software collaboration platform.

The FNPP is located approximately six miles northeast of Monroe, Michigan; 30 miles southwest of downtown Detroit, Michigan; and 25 miles northeast of downtown Toledo, Ohio. The Plume Exposure Pathway EPZ for the FNPP encompasses part of Monroe and Wayne Counties in Michigan, parts of Lake Erie, and the southern tip of Essex County, (Bay Point) Canada. Most of the EPZ falls within Monroe County.

The purpose of the exercise was to assess the level of preparedness in responding to an incident at the FNPP. The exercise was conducted in accordance with DHS/FEMA policies and guidance concerning the exercise of local radiological emergency response plans and procedures. The previous federally evaluated full-scale exercise for this site was conducted on August 28, 2018. The qualifying emergency preparedness exercise was conducted on February 2, 1982.

The second day of this exercise was devoted to the conduct of a facilitated tabletop exercise (TTX) that focused on RRR coordination and decision-making. In addition, a plume exposure pathway Medical Service Drill (MS-1) was conducted out-of-sequence on December 10, 2020. The Final Report for the MS-1 Drill was issued on December 22, 2020. The purpose of the federally evaluated MS-1 Drill was to assess the ability of offsite agencies to respond to a medical emergency involving a radiologically contaminated member of the public.

Officials and representatives from Monroe County and Wayne County participated in the May 18 and 19, 2021, virtual exercise. State of Michigan representatives participated as Facilitators and Observers. 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.

Local officials demonstrated knowledge of their emergency response plans and procedures and successfully implemented them.

The State of Michigan was not evaluated during this exercise, as all eight-year and biennial requirements, which applied to the State, were successfully demonstrated during previous exercises and drills. The DHS/FEMA evaluation team identified no Level 1 or Level 2 Findings and no Plan Issues for Monroe and Wayne Counties during the 2021 FNPP exercise.

The ongoing COVID-19 Public Health Emergency and other disasters that occurred during 2020 and 2021 presented 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 was evaluated virtually using Microsoft Teams® collaboration software. The Microsoft Teams® platform was configured by the Michigan State Police, Emergency Management & Homeland Security Division, to accommodate players, observers, and evaluators.

The exercise was originally scheduled for December 15, 2020. The exercise was postponed, due to the State and County response to the COVID-19 Public Health Emergency. As a result of this and other real-world responses, the participating jurisdictions were credited with extensive Actual Incident Credit. They successfully tethered and implemented virtual technologies and logistics that facilitated the assessment of the capabilities of Monroe and Wayne Counties to protect public health and safety. These combined efforts have significantly expanded the REP Program's relevance and capabilities.

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 Partial-Participation Plume Exposure Pathway Exercise, with Relocation, Reentry and Return (RRR) for Monroe and Wayne Counties, was conducted virtually on May 18 and 19, 2021, and evaluated by the DHS/FEMA to assess the capabilities of local offsite emergency preparedness organizations in implementing their RERPs and procedures to protect the public's health and safety during a radiological emergency involving the Fermi 2 Nuclear Power 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 Scenario and updated Extent-of-Play Agreement submitted by the State of Michigan for Monroe and Wayne counties on August 14, 2020 and April 1, 2021, respectively, were approved by the DHS/FEMA Region V RAC Chair on April 5, 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. 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 state and 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 Monroe and Wayne counties requested and received full Actual Incident Credit for the following Demonstration Criteria: 1.a.1, 1.c.1, 1.d.1, and 1.e.1. Partial Actual Incident Credit was approved for Demonstration Criteria 2.c.1 and 3.d.1 for Monroe County. Partial Actual Incident Credit was approved for Demonstration Criterion 3.d.1 for Wayne County. The Actual Incident Credit for the two Counties was approved by DHS/FEMA Region V via correspondence on December 4, 2020. The evaluation of Demonstration Criteria 3.c.2, 6.a.1, 6.c.1 was postponed to a later date once COVID-19-related travel restrictions are lifted. All other eight-year and biennial requirements were met by the State of Michigan during previous exercises and drills.

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

Fermi 2 Nuclear Power Plant Radiological Emergency Preparedness, Partial-Participation, Plume Exposure Pathway Exercise with Relocation, Reentry and Return (RRR) for Monroe and Wayne Counties

TYPE OF EXERCISE

Plume Exposure Pathway

EXERCISE DATE

May 18 and 19, 2020

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, Monroe Post
Michigan Department of Environment, Great Lakes, and Energy (a.k.a., EGLE)
(formerly known as the Michigan Department of Environmental Quality)
Michigan Department of Health and Human Services

RISK COUNTY ORGANIZATIONS

Monroe County

Monroe County Emergency Management Division
Monroe County Road Commission
Monroe County Health Department
Monroe County Police Department
Monroe County Sheriff's Department
City of Monroe
City of Monroe Fire Department

Wayne County

Wayne County Homeland Security & Emergency Management
Wayne County Sheriff's Department
Wayne County Department of Public Services
City of Trenton Emergency Management

PRIVATE ORGANIZATIONS

DTE Energy Electric Company (Fermi 2 NPP Licensee) (Observer)
Health Emergency Medical Services (HEMS)
Radio Amateur Civil Emergency Services (RACES)
Region 2 South Healthcare Coalition
Salvation Army

FEDERAL ORGANIZATIONS

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

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.

Formal submission of the Radiological Emergency Response Plans (RERPs) for the Fermi 2 Nuclear Power Plant to FEMA Region V by the State of Michigan occurred August 28 and September 28, 2020, for Wayne and Monroe Counties, respectively. Formal approval of these RERPs was granted by FEMA on December 3, 2020 for both Wayne County and Monroe County, by individual correspondence, under 44 CFR 350.

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 Monroe and Wayne Counties. 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 monitor, decontaminate, register, and shelter evacuees through discussion of plans and procedures.

Objective 7: Demonstrate the ability to provide protective action decision making for the plume phase.

Objective 8: 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 9: 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 nine 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 Agreement. 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 Monroe and Wayne Counties. The organizations, locations, and evaluation criteria selected by the State of Michigan and Monroe and Wayne Counties are described in Appendix D, Extent-of-Play Agreement, which was approved by DHS/FEMA on April 5, 2021.

The results of the assessment are summarized below by Core Capability, as demonstrated during the May 18 and 19, 2021, FNPP REP, Partial-Participation, Plume Exposure Pathway Exercise, including a Relocation, Reentry and Return (RRR) TTX for Monroe and Wayne Counties.

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. Monroe and Wayne Counties 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 SUMMARY OF RESULTS OF EXERCISE EVALUATION

Table 3.2-1 present the results and findings of the evaluation of all jurisdictions and functional entities that participated in the FNPP REP, Partial-Participation, Plume Exposure Pathway Exercise with Relocation, Reentry and Return (RRR) for Monroe and Wayne Counties.

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 – Monroe and Wayne Counties

DATE: May 18 and 19, 2021 SITE: Fermi 2 Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected FC: Full Credit (Actual Incident) PC: Partial Credit (Actual Incident)	CRITERION	Monroe County	Wayne County
Emergency Operations Management			
Mobilization	1a1	FC	FC
Facilities	1b1	NS	NS
Direction and Control	1c1	FC	FC
Communications Equipment	1d1	FC	FC
Equipment and Supplies to Support Operations	1e1	FC	FC
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	M	M
PARs	2b1	M	M
PADs	2b2	M	M
PADs for Disabled/Functional Needs	2c1	PC/M	M
Ingestion PADs	2d1	NS	NS
RRR Decisions	2e1	M	M
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	M
KI Public/Institutionalized	3b1	M	M
PAD Implementation Disabled/Functional Needs	3c1	NS	NS
PAD Implementation Schools	3c2	NS	NS
TACP Establishment	3d1	PC/M	PC/M
Impediments	3d2	M	M
Implement Ingestion PADs	3e1	NS	NS
Ingestion Pathway Decisions	3e2	NS	NS
Implementation of RRR Decisions	3f1	M	M
Field Measurement and Analysis			
RESERVED	4a1	NA	NA
Field Team Management	4a2	NS	NS
Field Team Operations	4a3	NS	NS
Field Team Sampling	4b1	NS	NS
Laboratory Operations	4c1	NS	NS
Emergency Notification and Public Info			
Initial Alert & Notification	5a1	M	M
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NS	NS
Exception Area Alerting	5a4	NS	NS
Subsequent Information & Instructions	5b1	M	M
Support Operations and Facilities			
Reception Center Operations	6a1	NS	NS
EW Monitoring & Decontamination	6b1	NS	NS
Congregate Care	6c1	NS	NS
Contaminated Injured Transport & Care	6d1	NS	NS

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3.3 CRITERIA EVALUATION SUMMARIES

The following sections present narrative summaries that describe observations made during the exercise pursuant to the Evaluation Criteria and Core Capabilities demonstrated virtually at each jurisdiction's response locations. Narrative summaries are organized by Jurisdiction, Assessed Core Capability, and the Evaluation Criterion discussed in the Appendix D, Extent-of-Play Agreement. Results of the assessments are summarized in Table 3.2-1.

The State of Michigan successfully demonstrated all eight-year and biennial requirements during previous exercises and drills.

3.3.1 Monroe County EOC

Monroe County requested and received Full Actual Incident Credit for Demonstration Criteria 1.a.1, 1.c.1, 1.d.1, and 1.e.1, and Partial Actual Incident Credit for Demonstration Criteria 2.c.1 and 3.d.1. Criteria selected for partial or full demonstration were as follows: 2.a.1, 2.b.1, 2.b.2, 2.c.1 (partial), 2.e.1, 3.a.1, 3.b.1, 3.d.1 (partial), 3.d.2, 3.f.1, 5.a.1, and 5.b.1. The following Demonstration Criteria will be evaluated at a later date once travel restrictions are lifted: 3.c.2, 6.a.1, and 6.c.1. Monroe County met all other eight-year and biennial requirements during previous exercises and drills.

Criterion 2.a.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Criterion 2.b.1 – 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 – 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 – Core Capability: Operational Coordination

Core Capability: Operational Communications

Core Capability: Situational Assessment

Criterion 2.e.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Situational Assessment

Core Capability: Economic Recovery

Core Capability: Health and Social Services

Core Capability: Housing

Core Capability: Natural and Cultural Resources

- Criterion 3.a.1 – Core Capability: Operational Coordination
Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – 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 – Core Capability: Operational Coordination
Core Capability: Critical Transportation
Core Capability: On-Scene Security and Protection
- Criterion 3.d.2 – Core Capability: Operational Coordination
Core Capability: Critical Transportation
Core Capability: Critical Infrastructure Systems
- Criterion 3.f.1 – Core Capability: Operational Coordination
Core Capability: Critical Transportation
Core Capability: Economic Recovery
Core Capability: Health and Social Services
Core Capability: Housing
Core Capability: Natural and Cultural Resources
- Criterion 5.a.1 – Core Capability: Public Information and Warning
Core Capability: Operational Coordination
Core Capability: Operation Communications
- Criterion 5.b.1 – 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 Monroe County 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 Wayne County EOC

Wayne County requested and received Full Actual Incident Credit for Demonstration Criteria 1.a.1, 1.c.1, 1.d.1, and 1.e.1, and Partial Actual Incident Credit for Demonstration Criterion 3.d.1. Criteria selected for partial or full demonstration are as follows: 2.a.1, 2.b.1, 2.b.2, 2.c.1, 2.e.1, 3.a.1, 3.b.1, 3.d.1 (partial), 3.d.2, 3.f.1, 5.a.1, and 5.b.1. The following Demonstration Criteria will be evaluated once travel restrictions are lifted: 3.c.2, 6.a.1, 6.c.1. Wayne County met all other eight-year and biennial requirements during previous exercises and drills.

- Criterion 2.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Situational Assessment
- Criterion 2.b.1 – 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 – 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 – Core Capability: Operational Coordination
 - Core Capability: Operational Communications
 - Core Capability: Situational Assessment
- Criterion 2.e.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Situational Assessment
 - Core Capability: Economic Recovery
 - Core Capability: Health and Social Services
 - Core Capability: Housing
 - Core Capability: Natural and Cultural Resources
- Criterion 3.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – 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 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: On-Scene Security and Protection
- Criterion 3.d.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Critical Infrastructure Systems
- Criterion 3.f.1 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Economic Recovery
 - Core Capability: Health and Social Services
 - Core Capability: Housing
 - Core Capability: Natural and Cultural Resources
- Criterion 5.a.1 – Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications
- Criterion 5.b.1 – 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 Wayne 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

SECTION 4: Conclusion

The DHS/FEMA evaluation team identified no Findings and no Plan Issues for Monroe and Wayne Counties during the 2021 Fermi 2 Exercise. The ongoing COVID-19 Public Health Emergency and other disasters that occurred during 2020-2021 presented the State of Michigan and Monroe and Wayne Counties 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 May 18 and 19, 2021, Fermi 2 Nuclear Power Plant (FNPP), Radiological Emergency Preparedness (REP) Partial-Participation, Plume Exposure Pathway Exercise to test the offsite emergency response capabilities of local governments in the 10-mile Emergency Planning Zone surrounding FNPP, recommended corrective actions, and 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 Findings and Plan Issues for the State of Michigan, as the State had successfully demonstrated all eight-year and biennial requirements during previous exercises and drills. The DHS/FEMA evaluation team identified no Level 1 or Level 2 Findings and no Plan Issues for Monroe and Wayne Counties during the 2021 FNPP exercise.

The ongoing COVID-19 Public Health Emergency, and other disasters that occurred during 2020-2021, presented the State of Michigan and Monroe and Wayne Counties 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 demonstration activities remotely.

Best Practices

The exercise was evaluated virtually using Microsoft Teams[®] collaboration software. In coordination with DHS/FEMA Region V, Microsoft Teams[®] software was configured by the State of Ohio Emergency Management Agency and Columbiana County to establish multiple Channels, each with audio/visual, chat, and exercise-related document sharing features. Electronic mail and cellphone voice and texting modalities were also used to support the exercise. The use of computer-based audio-visual collaboration software, email, and cellular telephone-facilitated voice and text communications allowed 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.

Finally, communication and coordination between the Wayne County and Monroe County Emergency Management organizations were deemed to be outstanding, timely and revealed a detailed understanding

of the other's respective roles and processes. This was demonstrated throughout the facilitated discussions comprising the Exercise.

APPENDIX B: Exercise Evaluation Team

SITE: Fermi 2 Nuclear Power Plant

EXERCISE DATE: May 18 and 19, 2021

Exercise Management	Name	Agency/ Organization
Chair, Regional Assistance Committee	Sean O’Leary	DHS/FEMA
Exercise Director	Stephen Tulley	DHS/FEMA
Deputy Exercise Director	Edward Golinski	DHS/FEMA
Michigan Site Specialist / Team Lead - Monroe County	James King	DHS/FEMA
Michigan Site Specialist (in Training)	Debra Schneck	DHS/FEMA
Team Lead – Wayne County	Todd Gemskie	DHS/FEMA

Monroe County		
Monroe County – EOC	Brett Beardsley	DHS/FEMA
Monroe County – EOC – Emergency Worker Exposure Control	Todd Lawson	DHS/FEMA
Monroe County – EOC – Public Information	Angela Cloutier	DHS/FEMA
Monroe County – EOC – Relocation, Reentry, Return	Todd Gemskie	DHS/FEMA

Wayne County		
Wayne County – EOC	James King	DHS/FEMA
Wayne County – EOC	Karl Rabenhorst	DHS/FEMA
Wayne County – EOC – Emergency Worker Exposure Control	David Persaud	DHS/FEMA
Wayne County – EOC – Public Information	Debra Schneck	DHS/FEMA
Wayne County – EOC – Relocation, Reentry, Return	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
ANS	Alert and Notification System
ACP	Access Control Point
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)
DHS	Department of Homeland Security
DRD	Direct-Reading Dosimeter
EAS	Emergency Alert System
ECL	Emergency Classification Level
EDT	Eastern Daylight Time
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EM	[Wayne County] Emergency Manager
EMA	Emergency Management Agency
EMD	Emergency Management Director
EMD	[Monroe County] Emergency Management Division
EOC	Emergency Operation Center
EOP	Emergency Operations Plan
EoPA	Extent-of-Play Agreement
EPD	Electronic Personal Dosimeter
EPZ	Emergency Planning Zone
ESF	Emergency Support Function
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
FNPP	Fermi 2 Nuclear Power Plant
FRMAC	Federal Radiological Monitoring and Assessment Center
GE	General Emergency
IP	Improvement Plan
HEMS	Health Emergency Medical Services
IPAWS	Integrated Public Alert and Warning System
JIC	Joint Information Center
JIS	Joint Information System
KI	Potassium Iodide
MAC	Multiagency Coordination
MCSO	Monroe County Sheriff's Office
MPD	Monroe [County] Police Department

ACRONYM	DESCRIPTION
mR	milliRoentgen
MS-1	Medical Service Drill
MSP	Michigan State Police
NGO	Non-Governmental Organization
No.	Number
NPP	Nuclear Power Plant
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
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
R	Roentgen
RAC	Regional Assistance Committee
RADPRO	Radiation Protection Officer
rem	radiation exposure man
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
RESA	[Wayne County] Regional Education Services Agency
RRR	Relocation, Reentry and Return
SAE	Site Area Emergency
SEOC	State Emergency Operations Center
TACP	Traffic and Access Control Point
TEDE	Total Effective Dose Equivalent
TTX	Tabletop Exercise
U.S.	United States

APPENDIX D: Extent-of-Play Agreement

STATE OF MICHIGAN AND MONROE AND WAYNE COUNTIES

FERMI 2 NUCLEAR POWER PLANT RADIOLOGICAL EMERGENCY PREPAREDNESS PARTIAL-PARTICIPATION PLUME EXPOSURE PATHWAY EXERCISE

MAY 18 AND 19, 2021

FERMI 2 NUCLEAR POWER PLANT RADIOLOGICAL EMERGENCY RESPONSE PARTIAL-PARTICIPATION PLUME EXPOSURE PATHWAY EXERCISE 2021



STATE OF MICHIGAN, MONROE COUNTY, AND WAYNE COUNTY EXTENT-OF-PLAY AGREEMENT MAY 18 AND 19, 2021

Fermi 2 REP Exercise Objectives May 18 & 19, 2021 Extent of Play Agreements for Monroe County, Wayne County, and the State of Michigan

Criteria that will be virtually demonstrated during this exercise and can be re-demonstrated immediately for credit, include the following: 2.e.1, 3.a.1, 3.b.1, 3.d.1 (partial), 3.f.1.

Criteria that may be re-demonstrated, as approved on a case-by-case basis by the FEMA Region V Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 2.c.1 (partial), 3.d.2, 5.a.1, 5.b.1.

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

Evaluation Area 1 - Emergency Operations Management

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.

State of Michigan

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

Actual incident credit has been approved.

Wayne County

Actual incident credit has been approved.

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

State of Michigan

1. The State Emergency Operations Center (SEOC) is maintained in operational readiness and its set up will not be demonstrated. The State was evaluated in 2019 and is due in 2027.
2. The Joint Information Center (JIC) is maintained in operational readiness and its set up will not be demonstrated. The State was evaluated in 2014 and is due in 2022.
3. The Field Team Center (FTC) will not be demonstrated.

Monroe County

1. The Emergency Operations Center (EOC) is maintained in operational readiness and its set up will not be demonstrated. Monroe County was evaluated in 2014 and is due in 2022.

Wayne County

1. The EOC is maintained in operational readiness and its set up will not be demonstrated. Wayne County was evaluated in 2015 and is due in 2023.

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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

Actual incident credit has been approved.

Wayne 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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019 and is due in 2021.

Monroe County

Actual incident credit has been approved.

Wayne 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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019 and is due in 2021.

Monroe County

Actual incident credit has been approved.

Wayne County

Actual incident credit has been approved.

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 (PAGs).

State of Michigan

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County – Does not apply unless situation warrants immediate action.

1. Monroe 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect emergency workers in a timely manner will be documented as an "Interim Protective Measures Decision" in lieu of a "Protective Action Decision".

Wayne County – Does not apply unless situation warrants immediate action.

1. Wayne 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect emergency workers in a timely manner will be documented as an "Interim Protective Measures Decision" in lieu of a "Protective Action Decision".

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 condition, field monitoring data, and licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions.

State of Michigan

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County – Does not apply unless situation warrants immediate action.

1. Monroe 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect the emergency workers in a timely manner will be documented as a "Precautionary Protective Measures Decision" in lieu of a "Protective Action Decision".

3. This criterion will be evaluated via interview if the scenario does not require the counties to make a PAR (2b1) or PAD (2b2) independent of the State PAR/PAD process.

Wayne County – Does not apply unless situation warrants immediate action.

1. Wayne 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect the emergency workers in a timely manner will be documented as a "Precautionary Protective Measures Decision" in lieu of a "Protective Action Decision".

3. This criterion will be evaluated via interview if the scenario does not require the counties to make a PAR (2b1) or PAD (2b2) independent of the State PAR/PAD process.

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chairman 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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

1. Monroe 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect the emergency workers in a timely manner will be documented as a "Precautionary Protective Measures Decision" in lieu of a "Protective Action Decision".

3. This criterion will be evaluated via interview if the scenario does not require the counties to make a PAR (2b1) or PAD (2b2) independent of the State PAR/PAD process.

Wayne County

1. Wayne 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.

2. Any decision regarding the implementation of protective measures prior to a Governor's Declaration by an agency with authority to warn and protect the emergency workers in a timely manner will be documented as a "Precautionary Protective Measures Decision" in lieu of a "Protective Action Decision".

3. This criterion will be evaluated via interview if the scenario does not require the counties to make a PAR (2b1) or PAD (2b2) independent of the State PAR/PAD process.

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chairman 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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County – Does not apply unless situation warrants immediate action. Partial actual incident credit was received.

1. Monroe 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.

Wayne County – Does not apply unless situation warrants immediate action.

1. Wayne 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.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate PADs are made based on the ORO planning criteria.

This criterion will not be demonstrated during this exercise.

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 evaluated.

Monroe County

1. Monroe County will demonstrate this criterion through an out-of-sequence Tabletop on May 19, 2021 through a discussion-based interview.

Wayne County

1. Wayne County will demonstrate this criterion through an out-of-sequence Tabletop on May 19, 2021 through a discussion-based interview.

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

This criterion will not be demonstrated during this exercise.

Monroe County

1. Monroe County will demonstrate this criterion through a discussion-based interview. This will be completed through the Traffic and Access Control Point (TACP) interview.
2. Two Emergency Workers (EWs) will need to be interviewed if the scenario does not require dose to be exceeded.
3. Monroe County will need to demonstrate the implementation of EW KI via the scenario.
4. Monroe County will demonstrate this criterion through out-of-sequence activities at the Dundee High School Public Reception & Decontamination Center and the Ida Public School Public Reception & Decontamination Center on a date and time to be determined.

These will take place once travel restrictions are lifted.

Wayne County

1. Wayne County will demonstrate this criterion through a discussion-based interview. This will be completed through the TACP interview.
2. Two EWs will need to be interviewed if the scenario does not require dose to be exceeded.
3. Wayne County will need to demonstrate the implementation of EW KI via the scenario.

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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

1. Monroe County will demonstrate the ability (simulate) to administer KI to institutionalized individuals. This criterion will be demonstrated through a discussion-based interview.
2. If institutionalized populations are found to exist at the time of the exercise, actual contacts will not be evaluated. One simulated call will be logged on a situation log, unless it is found there are no institutionalized populations that would apply within the EPZ.

Wayne County

1. Wayne County will demonstrate the ability (simulate) to administer KI to institutionalized individuals. This criterion will be demonstrated through a discussion-based interview.
2. If institutionalized populations are found to exist at the time of the exercise, actual contacts will not be evaluated. One simulated call will be logged on a situation log, unless it is found there are no institutionalized populations that would apply within the EPZ.

Note: This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

Criterion 3.c.1: 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.

Monroe County

This criterion was successfully demonstrated during the Fermi biennial exercise on August 28, 2018.

Wayne County

This criterion was successfully demonstrated during the Fermi biennial exercise on August 28, 2018.

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.

Monroe County

1. This criterion will be demonstrated by Monroe County EOC as driven by the scenario.
2. An EV-2 interview will be conducted out-of-sequence on a date and time to be determined, through a discussion-based interview. This will be scheduled once travel restrictions are lifted.

Wayne County

1. This criterion was successfully demonstrated as an out-of-sequence activity during the Fermi biennial exercise in 2016 and 2018.

Note: This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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

State of Michigan

This criterion will not be demonstrated by the State.

Monroe County (Partial Actual Incident Credit Received)

1. Decisions related to traffic and access control will be demonstrated in the Monroe County EOC.
2. Staffing of all other access and traffic control points will be simulated.
3. Demonstration will be conducted through a discussion-based interview.

Wayne County (Partial Actual Incident Credit Received)

1. Decisions related to traffic and access control will be demonstrated in the Wayne County EOC.
2. Staffing of all other access and traffic control points will be simulated.
3. Demonstration will be conducted through a discussion-based interview.

Note: This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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.

Monroe County

1. This will be conducted through a discussion-based interview.

Wayne County

1. This will be conducted through a discussion-based interview.

Note: This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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 PADs 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 by the State.

Monroe County

1. Monroe County will demonstrate this criterion through an out-of-sequence Tabletop on May 19, 2021, through a discussion-based interview.

Wayne County

1. Wayne County will demonstrate this criterion through an out-of-sequence Tabletop on May 19, 2021, through a discussion-based interview.

Evaluation Area 4 - Field Measurement and Analysis

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 not be demonstrated during this exercise.

Monroe County and Wayne 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

This criterion will not be demonstrated during this exercise.

Monroe County and Wayne County

This criterion does not apply.

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

State of Michigan

This criterion will not be demonstrated during this exercise.

Monroe County and Wayne County

This criterion does not apply.

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

State of Michigan

This criterion will not be demonstrated during this exercise.

Monroe County and Wayne 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 FEMA REP guidance.

State of Michigan

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

1. Monroe County is the primary activation point for the public warning sirens. Monroe County also activates the Emergency Alert System (EAS) using the Integrated Public Alert and Warning System (IPAWS). A FEMA evaluator will confirm the message was received at FEMA IPAWS lab any time after the message was sent.

Wayne County

1. Wayne County will provide, as needed, information to Monroe County for inclusion in EAS messages.

Note: This criterion may be re-demonstrated as approved on a case-by-case basis by the Chairman 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 of the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

This criterion will not be demonstrated during this exercise. The Fermi 2 Emergency Planning Zone (EPZ) does not contain any DHS/FEMA approved exception areas.

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

This criterion will not be evaluated. This criterion was successfully demonstrated during the DC Cook biennial exercise on August 27, 2019.

Monroe County

1. This will be demonstrated through a discussion-based interview with the county PIO.

Wayne County

1. This will be demonstrated through a discussion-based interview with the county PIO.

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

Evaluation Area 6 - Support Operation/Facilities

Evaluation Area 6 criteria will not be evaluated, but will be demonstrated and evaluated at a later date.

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 will not be evaluated.

Monroe County

This criterion will not be demonstrated during this exercise. At a later date:

1. Monroe County will demonstrate separate public reception/decontamination center out-of-sequence: Dundee High School Public Reception & Decontamination Center on and Ida Public School Public Reception & Decontamination Center on a date and time to be determined. This will be conducted once the travel restrictions have been lifted.

2. The capability to monitor 20% of the population in the 10-mi EPZ over a 12-hour period will be demonstrated. To meet this objective a facility must be able to monitor, on average, 3.3 people per minute. Six (simulated) evacuees will be monitored. One portal monitor will be set up to process the evacuees. One person will be contaminated (simulated).
3. Dosimetry and survey instrument calibration and maintenance records will be evaluated as described under Criterion 1.e.1.
4. Set-up will occur and conclude in a reasonable time. Evaluators will observe but not interfere with the set-up process at the Center prior to the beginning of the evaluated demonstration.
5. A Radiological Worker Break area will be demonstrated through discussion and will not be required to be set up. Workers will be allowed to eat and drink during the center setup period, prior to demonstration of operations. Workers may use restrooms freely during center set-up and operation.
6. Decontamination of the public and vehicles will not be demonstrated. Vehicles will be parked, if contaminated.

Wayne County

This criterion will not be demonstrated during this exercise.

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.

State of Michigan

The State Worker Decontamination (DECON) Center will not be demonstrated.

Monroe County

All emergency worker DECON centers have been successfully demonstrated within the 8-year cycle.

Wayne County

All emergency worker DECON centers have been successfully demonstrated within the 8-year cycle.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

State of Michigan

This criterion does not apply.

Monroe County

This criterion will not be demonstrated during this exercise. At a later date:

1. Monroe County will demonstrate a congregate care center out-of-sequence with the exercise at Dundee High School and at Ida Public School on a date and time to be determined. Personnel operating the center will not go through alert, mobilization, activation, or shift changes. Appropriate 24/7 staffing will be demonstrated via personnel rosters, call-up lists, etc. This will take place once the travel restrictions have been lifted.

Wayne County

All congregate care centers have been successfully demonstrated within the 8-year cycle.

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

During this exercise State Technical Personnel 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.

Monroe County

This criterion was successfully demonstrated during an MS-1 Drill on December 10, 2020 with ProMedica Monroe Hospital located at 718 North Macomb Street, Monroe, Michigan.

Wayne County

This criterion was successfully demonstrated as an out-of-sequence activity during the MS-1 Drill on November 13, 2020 with Beaumont Hospital-Trenton, South Shore Campus Medical Center located at 5450 Fort Street, Trenton, Michigan.