



Palisades Nuclear Power Plant

After Action Report/ Improvement Plan

Exercise Date - October 28, 2014

Radiological Emergency Preparedness (REP) Program



FEMA

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EXECUTIVE SUMMARY

On October 28, 2014, a Hostile Action Based (HAB), Partial Participation Plume Exposure Pathway Radiological Emergency Preparedness (REP) Exercise evaluation was conducted by the U.S. Department of Homeland Security (DHS) / Federal Emergency Management Agency (FEMA) for the 10-mile Emergency Planning Zone (EPZ) around the Palisades Nuclear Power Plant (PNPP). The purpose of this exercise was to assess the level of State and local preparedness for responding to a hostile action initiated radiological emergency. The exercise was conducted in accordance with DHS/FEMA's policies and guidance concerning the exercise of State and local Radiological Emergency Response Plans (RERPs) and procedures.

The most recent exercise at this site was conducted on October 30, 2012. The qualifying emergency preparedness exercise was conducted on December 9, 1980.

DHS/FEMA wishes to acknowledge the efforts of the many individuals who participated in this exercise. In the State of Michigan, the risk counties of Allegan, Berrien, and Van Buren participated in cooperation with various state government and non-profit agencies.

Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. Cooperation and teamwork on the part of all the participants were evident during this exercise.

This Final Report contains the evaluation of the biennial exercise and the evaluation of the following out-of-sequence interviews and activities:

- Protective Actions for Schools (EV-2)
- Monitoring and decontamination of evacuees and emergency workers
- Monitoring and decontamination of emergency worker's equipment
- Public registration
- Congregate care center
- Medical service drills (MS-1)

Except where noted in this report, the State and local organizations demonstrated knowledge of and adequately implemented their emergency response plans and procedures.

No Deficiencies or Areas Requiring Corrective Action (ARCAs) were identified for the State of Michigan or for Allegan, Berrien, and Van Buren Counties during this exercise.

Three plan issues were identified for the State of Michigan during the April 29, 2014, Enrico Fermi 2 Nuclear Power Plant REP exercise but were not resolved during this exercise. Due to the scope of the inter-agency coordination required to develop and implement the necessary changes and the time needed to conduct training for the offsite responders, the State of Michigan requested approval to continue using the existing plans and procedures for this exercise. The Interim Regional Assistance Committee Co-Chairs granted provisional approval to use the existing State and County plans and directed that any additional plan anomalies identified during this exercise would be documented and provided to the appropriate agencies for incorporation into their pending revisions, but that no new plan issues would be generated for these criteria. A FEMA Region V Staff Assistance Visit (SAV) and comprehensive state-wide, multi-jurisdictional Radiological Emergency Response Plan review is scheduled for the spring of 2015. These plan issues will be resolved in conjunction with the DC Cook Plume Exposure Pathway exercise in October, 2015.

Plan Issue: 23-14-2a1-P-01, Assessment Area 2, Protective Action Decision-making, Sub-element a. Emergency Worker Exposure Control, Criterion 2.a.1 – In various locations throughout the State Plan, Nuclear Facilities Emergency Management Plan (NFEMP), and the County Plans, different expectations are provided to Emergency Workers and Radiological Safety Officers regarding Administrative Limits and under whose authority they can be exceeded. The NFEMP has stipulations for Non-State emergency workers that they must receive specific authorization from the SEOC to exceed their dose limit except as authorized under a county plan. It further explains that responsibility to exceed administrative limits resides with the Ops HP at the State Emergency Operation Center (SEOC). The Monroe and Wayne County plans and procedures do not refer to the expectation that to exceed dose limits the State must be consulted. There is also inconsistency as to what dose levels (e.g. 1R, 3R, 25R) specific authorization is necessary.

Plan Issue: 23-14-5b1-P-02, Assessment Area 5, Emergency Notification and Public Information, Sub-element b. Emergency Information and Instructions for the Public and the Media, Criterion 5.b.1 – Conflicting instructions were provided to dairy herd and livestock operators in Protective Action Areas (PAAs) 1, 2 and 3. During the Site Area Emergency, at

0950 hours, the Michigan Department of Agriculture and Rural Development (MDARD) issued an Agricultural Advisory for “Dairy Herd and Livestock Operators” in PAAs 1 through 5 which directed the sheltering of animals inside and placing them stored feed and water. Both the Governor’s Disaster Declaration at 0952 hours, and the State Emergency Operations Center (SEOC) New Release at 1002 hours, paraphrased the MDARD Agricultural Advisory. The pre-scripted message issued by the SEOC at 1115 hours, during the General Emergency, indicated that the Governor had ordered “Evacuation of all individuals living or working in Area(s) 1, 2 and 3. However, the attached “Evacuation Directive” ordered “...evacuation of all non-essential personnel in the following described areas in the Counties of Wayne and Monroe: Areas 1, 2 and 3...” Definition of “non-essential personnel” was not provided, nor was there an indication that the previously issued Livestock Advisory had been rescinded.

At 1120 hours, MDARD issued Agricultural Advisories for “Food Establishments and Facilities, Feed Operators and Facilities, Fruit & Vegetable Growers and Distributors and Farmers, Gardeners, & Produce-Stand Operators in PAAs 1, 2 & 3. Again there was no mention was made of the previous livestock advisories, nor any indication that they had been formally rescinded.

At 1218 hours, News Release JIC 002 – JIC to Media, page 3, paragraph six, titled “Dairy Herd and Livestock Operators” reiterated the original MDARD Agricultural Advisory: “Until further notice and to the extent possible, all dairy and livestock animals in all five Areas must be sheltered in a barn or shed with doors/windows closed. Poultry should be caged in layer facilities with ventilation fans operating at low speed to minimize exposure to outside air. Pets and other domestic animals should be sheltered indoors or under cover. Animals should be fed only from stored feed and well water.”

Plan Issue: 23-14-2a1-P-03, Assessment Area 2, Protective Action Decision-making, Sub-element a. Emergency Worker Exposure Control, Criterion 2.a.1 – The Michigan Department of Environmental Quality 2014 Nuclear Facilities Emergency Management Plan (NFEMP) specified that emergency workers were limited to Total Effective Dose Equivalent (TEDE) limits of 5 rem for emergency operations, with 1 R per day and 3 R per event administrative exposure limits. The Plan did not specify a Direct-Reading Dosimeter (DRD) correction factor to account for internal component of TEDE. While Health Physics Response Team (HPRT) member TEDE may be calculated in the Field Team Center using the Team Dose tab in the DoseModel program, there is no process to ensure other emergency workers’ TEDE is calculated.

There was one Plan Issue identified for Allegan County. Plan Issue: 44-14-6a1-P-01, Assessment Area 6, Support Operations / Facilities, Sub-element a. Monitoring, Decontamination and Registration of Evacuees, Criterion 6.a.1 – The Allegan County Radiological Emergency Procedure requires that vehicle interior surveys be conducted with a CDV-700 instrument with a GM pancake probe after depositing passengers at the personnel monitoring station at the Evacuee Monitoring and Decontamination facility at Otsego High School. During the exercise conducted on October 29, 2014, monitoring of the vehicle interior with the CDV-700 was not performed.

There were no Plan Issues identified for Berrien or Van Buren Counties during this exercise.

INTRODUCTION - EXERCISE BASIS

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. DHS/FEMA's activities are conducted pursuant to the Code of Federal Regulations (CFR), Title 44: Emergency Management and Assistance, Parts 350 “Review and Approval of State and Local Radiological Emergency Plans and Preparedness”, 351 “Radiological Emergency Planning and Preparedness” and 352 “Commercial Nuclear Power Plants: Emergency Preparedness Planning.” These regulations prescribe policy and procedures for the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

The policies and procedures for DHS/FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants are prescribed in 44 CFR 350. This approval is contingent, in part, on State and local governments' participation in joint exercises with licensees.

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

- Taking the lead in offsite emergency planning and in the review and evaluation of 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 June 17, 1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of 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.

Formal submission of the RERPs for the Palisades Nuclear Power Plant to FEMA Region V by the State of Michigan and involved local jurisdictions occurred on December 9, 1980. Formal approval of these RERPs was granted by FEMA on July 6, 1982, in accordance with 44 CFR 350.

A HAB Partial-Participation Plume Exposure Pathway REP Exercise was conducted on October 28, 2014, and evaluated by DHS/FEMA to assess the capabilities of State and local offsite emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a hostile action initiated radiological emergency involving the Palisades 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 hostile action initiated radiological emergency.

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 Chairperson, 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;
- FEMA "Radiological Emergency Preparedness Manual," June 2013.
- FEMA "Radiological Emergency Preparedness: Exercise Evaluation Methodology; Notice" as published in the Federal Register Notice, Vol. 67, No. 80, dated April 25, 2002.

Section 1 of this report, entitled "Exercise Overview", presents information pertaining to the team that planned and coordinated the exercise. This section also provides listing of all participating jurisdictions and functional entities that were evaluated.

Section 2 of this report, entitled "Exercise Design Summary", contains the purpose and design of the exercise, a description of the plume pathway EPZ and presents basic information and data relevant to the exercise scenario.

Section 3 of this report, entitled "Analysis of Capabilities," presents detailed information on the demonstration of applicable exercise criteria at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. This section also contains: (1) descriptions of all Deficiencies and ARCAs (if any) assessed during this exercise, recommended corrective actions, and the State and local governments' schedule of corrective actions, if applicable, for each identified exercise issue; and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs' efforts to resolve them.

Section 4 of this report, entitled "Conclusion" presents the DHS/FEMA summary of overall exercise conduct and results as evaluated against the requirements of 44 CFR 350.

EMERGENCY PLANNING ZONE (EPZ) DESCRIPTION

The Palisades Nuclear Power Plant is a single unit pressurized water reactor with a net capacity of 805 megawatts. The facility owned and operated by Entergy Nuclear Operations, Incorporated, commenced commercial operation in December 1971. Lake Michigan is the cooling water source for the plant.

The plant is located in northwestern Van Buren County, Michigan, on the shore of Lake Michigan, approximately five miles south-southwest of South Haven. The 10-mile Plume Exposure Pathway EPZ of the Palisades Nuclear Power Plant encompasses parts of Allegan, Berrien, and Van Buren Counties, with the major portion of the zone falling within Van Buren County. The most current EPZ population data provided to FEMA reflects the 2000 Census. Per the 2000 Census data, the total plume pathway EPZ permanent population was 33,027 persons. In Michigan, the 50-mile Ingestion Exposure Pathway EPZ of the Palisades Nuclear Power Plant encompasses parts of Allegan, Barry, Berrien, Cass, Kalamazoo, Kent, Ottawa, St. Joseph and Van Buren Counties. In Indiana, the 50-mile Ingestion Exposure Pathway EPZ of the Palisades Nuclear Power Plant encompasses parts of Elkhart, La Porte and St. Joseph Counties.

The 10-mile Plume Exposure Pathway EPZ is comprised of five Protective Action Areas (PAAs), numbered 1 to 5, with PAAs 1, 2, and 3 being located within Van Buren County only; PAA 4 is located within both Allegan and Van Buren Counties; and PAA 5 is located within both Berrien and Van Buren Counties. Per the 2000 Census, the permanent population of PAA 1 was 2,001. The permanent population of PAA 2 was 1,939. The permanent population of PAA 3 was 2,360. The permanent population of PAA 4 was 10,283. The permanent population of PAA 5 was 4,308.

Approximately 50 percent of the 10-mile Plume Exposure Pathway EPZ lies within Lake Michigan. The lake attracts a large number of vacationers during the summer. The area includes various summer resorts, which offer camping facilities, light housekeeping cottages, tourist's attractions, and the Van Buren State Park. The City of South Haven, with a tourism based economy, is located five miles north of the plant. The population varies from summer to winter months.

Agricultural use of the land includes seasonal fresh fruit and vegetable farming and processing. Peak agricultural use takes place during the spring, summer, and fall months.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

Palisades Nuclear Power Plant

Type of Exercise

Plume

Exercise Date

October 28, 2014

Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

Scenario Type

Radiological Emergency

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1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Palisades Nuclear Power Plant exercise:

State Jurisdictions

- State of Michigan Governor's Office
- Michigan State Police
- Michigan Department of Agriculture
- Michigan Department of Community Health
- Michigan Department of Environmental Quality
- Michigan Department of Licensing and Regulatory Affairs
- Michigan Department of Military and Veteran Affairs
- Michigan Department of Technology, Management and Budget
- Michigan Department of Transportation
- Michigan Office of Services to the Aging
- Michigan State Attorney General's Office
- Michigan State Fire Marshal
- Michigan Supreme Court

Risk Jurisdictions

- Allegan County Board of Commissioners
- Allegan County Sheriff's Department (911 operators)
- Allegan County Sheriff's Department
- Allegan County Emergency Management Agency
- Allegan Area Educational Service Agency (AAESA)
- Allegan County Emergency Medical Services
- Allegan County Fire Services
- Allegan County Health Department

Allegan County Human Services
Allegan County Public Information Officer
Allegan County Radiological Defense (RADEF)
Allegan County Road Commission
Allegan County Transportation Department
Berrien County Board of Commissioners
Berrien County Emergency Management
Berrien County Public Safety Communications Dispatch Center
Berrien County Sheriff's Department
Berrien County Emergency Medical Services
Berrien County Health Department
Berrien County Human Services
Berrien County Public Information Officer
Berrien County Radiological Protection (RADPRO)
Berrien County Road Commission
Berrien County School District
South Haven Area Emergency Services (SHAES) Authority
Van Buren County Board of Commissioners
Van Buren County Sheriff's Office
Van Buren County Office of Domestic Preparedness
Van Buren County Emergency Medical Services
Van Buren County Fire Services
Van Buren / Cass County Health Department
Van Buren County Human Services
Van Buren County Intermediate Schools
Van Buren County Public Information Officer
Van Buren County Radiological Defense (RADEF)
Van Buren County Road Commission

Support Jurisdictions

Bangor Fire Department
Bangor School District
Covert Township Fire Department
Covert Township Police Department
Hagar Township

North Berrien Fire & Rescue

North Berrien Fire & Rescue Ladies Auxiliary

Otsego Fire Department

Paw Paw Fire Department

Watervliet Public School District

Private Organizations

Allegan County Radio Amateur Civil Emergency Service (RACES)

American Red Cross

Area Agency on Aging Region IV

Berrien Amateur Radio Emergency Service (ARES)

Emergency Alert System Radio Station WCXT

Entergy Nuclear Operations, Inc

Lakeview Hospital

Palisades Nuclear Power Plant Liaisons

Riverwood Center

Salvation Army

South Haven Community Hospital

Van Buren County Radio Amateur Civil Emergency Service (RACES)

Federal Jurisdictions

Federal Bureau of Investigation

National Weather Service

US Department of Transportation

US Coast Guard

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

The DHS/FEMA Region V Office evaluated the Palisades Nuclear Power Plant (PNPP) Hostile Action Based (HAB), Full-Participation, Plume Exposure Pathway Radiological Emergency Preparedness (REP) Exercise conducted on October 28, 2014, to assess the capabilities of local emergency preparedness organizations in implementing their Radiological Emergency Response Plans (RERP) and procedures to protect the public health and safety during a hostile action initiated radiological emergency involving the PNPP. The purpose of this report is to present the results and findings on the performance of the Offsite Response Organizations (OROs) during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and identified Capabilities/REP Criteria selected to be demonstrated are discussed in Appendix E “Exercise Plan.”

2.3 Scenario Summary

Appendix F “Off-Site Scenario Details,” contains a summary of the exercise scenario, a simulated sequence of events that was used as the basis for invoking emergency response actions by Offsite Response Organizations (OROs) in the Palisades Nuclear Power Plant (PNPP) HAB Partial-Participation, Plume Exposure Pathway, REP exercise on October 28, 2014.

The exercise scenario was submitted by the Entergy Nuclear Operations Senior Emergency Planner directly to the FEMA contract technical evaluator, without FEMA Region V coordination, during the week of August 25, 2014. Results of a technical review indicated that the scenario was adequate to support Offsite demonstration of 44 CFR 350 biennial demonstration requirements and the criteria selected by the State of Michigan and Van Buren County in the State of Michigan’s July 15, 2014 through October 20, 2014 extent-of-play submissions. The Utility’s scenario did not fully support the Offsite Plume Exposure Pathway biennial demonstration requirements for Allegan or Berrien Counties. Berrien County demonstrated its Hostile Action Based and Plume Exposure Pathway response capabilities and biennial requirements during the D. C. Cook HAB exercise on June 4, 2013. Allegan County’s last demonstration was on June 4, 2012. Per the DHS/FEMA Region V Regional Assistance

Committee (RAC) Interim Co-Chair conditional letter of approval of October 9, 2014 “The Scenario for Allegan County criterion may not be adequate to drive exercise related "play" demonstration, however these criterion may be demonstrated through use of out-of-sequence exercise injects or mini-scenarios. Therefore, the Scenario, with the noted exceptions for Allegan County, is approved.” In the absence of Offsite scenario driven exercise play, it was incumbent upon the State of Michigan exercise controllers to provide appropriate out-of-sequence injects and/or mini-scenarios to ensure that all Offsite Response Organizations (OROs) were afforded adequate opportunity to demonstrate the selected criteria.

During the Pre-Exercise Meeting on October 27, 2014, the Lead State Controller informed the FEMA evaluation team that the Incident Command Post (ICP) and Staging Area demonstrations would be conducted as practiced during recent drills based on the following plans:

- Michigan Emergency Management Plan, Hostile Action Based Events Support Plan of August 2014
- Van Buren County Hostile Action Based Plan for Palisades Nuclear Plant of August 2014
- Van Buren County Radiological Emergency Incident Command Post/Unified Incident Command Standard Operating Procedures of September 2014

At the direction of the Exercise Director, the ICP and Staging Area evaluation teams were reorganized to accommodate the representatives of all supporting agencies serving under the tactical and operational command of the Van Buren County Sheriff’s Office as prescribed in Michigan Compiled Law Act 390 § 30.410. Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.1, 2.c.1, 3.a.1, 3.c.1, 3.d.1 and 3.d.2 at the ICP and Staging Area were evaluated under the tactical and operational command of Van Buren County.

During the exercise, in addition to information and data provided through the PNPP onsite scenario, controllers from the State of Michigan provided “inject messages” containing scenario events and/or relevant data to those persons or locations who would normally receive notification of such events. These inject messages were the method used for invoking additional specific response actions by OROs. To preclude Not Demonstrated findings when a mini-scenario and/or inject messages were not provided to facilitate Allegan County's 44 CFR 350 biennial demonstration requirements, the evaluators conducted extensive interviews of appropriate players to accomplish demonstration of the affected criteria.

The details of the exercise scenario are provided in Appendix F “Off-Site Scenario Details.”

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Exercise Evaluation and Results

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the October 28, 2014, HAB Full-Participation, Plume Exposure Pathway REP Exercise conducted to test the offsite emergency response capabilities of State and local governments in the EPZ surrounding the PNPP.

Each jurisdiction and functional entity was evaluated based on its demonstration of exercise criteria delineated in the REP Program Manual of June, 2013. Detailed information on the exercise criteria and the extent-of-play agreements used in this exercise are found in Appendix E “Exercise Plan” of this report.

Presented below are definitions of the terms used in this report relative to the criteria demonstration status:

- **M – Met:** The status of a REP exercise Evaluation Area Criterion indicating that the participating Offsite Response Organization (ORO) demonstrated all demonstration criteria for the Evaluation Area Criterion to the level required in the extent-of-play agreement with no Deficiencies or ARCAs assessed in the current exercise and no unresolved prior ARCAs.
- **D – Deficiency:** An observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.
- **A – Area Requiring Corrective Action (ARCA) –** An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety. Listing of the demonstrated exercise criteria under which one or more ARCAs was/were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of any ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.
- **P – Plan Issue –** An observed or identified inadequacy in the ORO’s emergency plan or implementing procedures, rather than in the ORO’s performance.
- **N – Not Demonstrated –** Exercise criteria that were not demonstrated as scheduled during this

exercise and the reason(s) they were not demonstrated.

- Prior ARCAs - Resolved – Descriptions of ARCAs assessed during previous exercises that were resolved and the corrective actions demonstrated, in this exercise.
- Prior ARCAs - Unresolved – Descriptions of ARCAs assessed during prior exercises that were not resolved in this exercise. Included is the reason the ARCA remains unresolved and recommended corrective actions to be demonstrated before or during the next exercise.

3.2 Summary Results of Exercise Evaluation

The matrix presented in Table 3.1, on the following pages, presents the status of all exercise criteria prescribed in the REP Program Manual of June, 2013, which were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. If the criterion status box is blank, the criterion was not scheduled for demonstration.

This subsection provides information on the evaluation of each participating jurisdiction and functional entity in a jurisdiction-based, issues-only format.

The DHS has developed a standardized system for numbering exercise issues. This system is used to achieve consistency in numbering exercise issues among DHS Regions and site-specific exercise reports within each Region. It also is used to expedite tracking of exercise issues on a nationwide basis.

The identifying number of Deficiencies, ARCAs, and Plan Issues includes the following elements, with each element separated by a hyphen (-).

- Plant Site Identifier – A two-digit number, corresponding to the Utility Billable Plant Site Code (44 for Palisades Nuclear Power Plant).
- Exercise Year – The last two digits of the year the exercise was conducted.
- Criterion Number – An alpha and two-digit number corresponding to the criteria numbers in the six Exercise Evaluation Areas described in REP Program Manual, dated April, 2012, Radiological Emergency Preparedness Exercise Manual.
- Issue Classification Identifier – (D = Deficiency, A = ARCA, P = Plan Issue).
- Exercise Identification Number – A separate two or three-digit indexing number assigned to each issue identified in the exercise.

Table 3.1 - Summary of Exercise Evaluation (5 pages)

<p align="center">DATE: 2014-10-28 SITE: Palisades Nuclear Power Plant, MI M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated</p>		MI-MSP MIOC-INP	MI-SEOC	MI-SEOC TSG	MI-FTC SC	MI-EOC ALG-StLias--	MI-EOC BER-StLias--	MI-EOC VAN-StLial--	MI-HAB-ICP/UCP LNO-PNPP	MI-HAB-Staging LNO-PNPP	MI-JIC--PNPP	MI-JIC--RunCon-PNPP
Emergency Operations Management												
Mobilization	1a1	M	M		M	M	M	M			M	M
Facilities	1b1											
Direction and Control	1c1		M			M	M	M			M	M
Communications Equipment	1d1	M	M			M	M	M			M	M
Equipment and Supplies to Support Operations	1e1		M			M	M	M			M	M
Protective Action Decision Making												
EW Exposure Control Decisions	2a1		P	P								
PARs	2b1			M								
PADs	2b2		M	M								
PADs for Disabled/Functional Needs	2c1		M	M								
Ingestion PADs	2d1											
RRR Decisions	2e1											
Protective Action Implementation												
EW Exposure Control Implementation	3a1											
KI Public/Institutionalized	3b1		M									
PAD Implementation Disabled/Functional Needs	3c1											
PAD Implementation Schools	3c2											
TACP Establishment	3d1		M									
Impediments	3d2											
Implement Ingestion PADs	3e1											
Ingestion Pathway Decisions	3e2											
Implementation of RRR Decisions	3f1											
Field Measurement and Analysis												
RESERVED	4a1											
Field Team Management	4a2				M							
Field Team Operations	4a3											
Field Team Sampling	4b1											
Laboratory Operations	4c1											
Emergency Notification and Public Info												
Initial Alert & Notification	5a1		M	M		M	M	M				
RESERVED	5a2											
Backup Alert & Notification	5a3											
Exception Area Alerting	5a4											
Subsequent Information & Instructions	5b1		P	M		M	M	M			M	M
Support Operations/Facilities												
Reception Center Operations	6a1											
EW Monitoring & Decontamination	6b1											
Congregate Care	6c1											

Contaminated Injured Transport & Care	6d1													
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Table 3.1 - Summary of Exercise Evaluation (Continued. page 2/5)

<p style="text-align: center;">DATE: 2014-10-28 SITE: Palisades Nuclear Power Plant, MI M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated</p>			MI-Berrien Springs HS-Ev M&D-MDEQ Tech	MI-Coloma HS--EW/MD-MDEQ Tech	MI-Otsego HS--EvMD-MDEQ Tech-	MI--South Haven ES Amb-MS/IT-MDEQ Tech	MI-South Haven CH-MS-1F-MDEQ Tech	ALG-INP---	ALG-EOC---	ALG---DosBrief-EW/TACP	ALG---TACP-	ALG-HAB-ICP/UCP LNO-PNPP
Emergency Operations Management												
Mobilization	1a1							M	M			
Facilities	1b1								M			
Direction and Control	1c1								M			
Communications Equipment	1d1	M	M	M	M	M	M	M	M		M	
Equipment and Supplies to Support Operations	1e1	M	M	M	M	M			M	M	M	
Protective Action Decision Making												
EW Exposure Control Decisions	2a1								M			
PARs	2b1								M			
PADs	2b2								M			
PADs for Disabled/Functional Needs	2c1								M			
Ingestion PADs	2d1											
RRR Decisions	2e1											
Protective Action Implementation												
EW Exposure Control Implementation	3a1	M	M	M	M	M				M	M	
KI Public/Institutionalized	3b1								M			
PAD Implementation Disabled/Functional Needs	3c1								M			
PAD Implementation Schools	3c2											
TACP Establishment	3d1								M		M	
Impediments	3d2								M			
Implement Ingestion PADs	3e1											
Ingestion Pathway Decisions	3e2											
Implementation of RRR Decisions	3f1											
Field Measurement and Analysis												
RESERVED	4a1											
Field Team Management	4a2											
Field Team Operations	4a3											
Field Team Sampling	4b1											
Laboratory Operations	4c1											
Emergency Notification and Public Info												
Initial Alert & Notification	5a1								M			
RESERVED	5a2											
Backup Alert & Notification	5a3											
Exception Area Alerting	5a4											
Subsequent Information & Instructions	5b1								M			

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Support Operations/Facilities												
Reception Center Operations	6a1	M		M								
EW Monitoring & Decontamination	6b1	M	M									
Congregate Care	6c1											
Contaminated Injured Transport & Care	6d1				M	M						

Table 3.1 - Summary of Exercise Evaluation (Continued. page 3/5)

<p style="text-align: center;">DATE: 2014-10-28 SITE: Palisades Nuclear Power Plant, MI M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated</p>			ALG-HAB-Staging LNO-PNPP	ALG--JIC-Co PIO--PNPP	ALG-Otsego HS--EvMD-	ALG-Otsego HS--EvMDV-	ALG-Otsego HS--CCC-	BER-INP---	BER-EOC---	BER-DosBrief-EOC-EW/TACP	BER---TACP-	BER-HAB-ICP/UCP LNO-PNPP
Emergency Operations Management												
Mobilization	1a1		M					M	M			
Facilities	1b1											
Direction and Control	1c1		M						M			
Communications Equipment	1d1		M	M		M	M	M	M		M	
Equipment and Supplies to Support Operations	1e1		M	M		M		M	M	M	M	
Protective Action Decision Making												
EW Exposure Control Decisions	2a1								M			
PARs	2b1								M			
PADs	2b2								M			
PADs for Disabled/Functional Needs	2c1								M			
Ingestion PADs	2d1											
RRR Decisions	2e1											
Protective Action Implementation												
EW Exposure Control Implementation	3a1			M						M	M	
KI Public/Institutionalized	3b1								M			
PAD Implementation Disabled/Functional Needs	3c1								M			
PAD Implementation Schools	3c2								M			
TACP Establishment	3d1								M		M	
Impediments	3d2								M			
Implement Ingestion PADs	3e1											
Ingestion Pathway Decisions	3e2											
Implementation of RRR Decisions	3f1											
Field Measurement and Analysis												
RESERVED	4a1											
Field Team Management	4a2											
Field Team Operations	4a3											
Field Team Sampling	4b1											
Laboratory Operations	4c1											
Emergency Notification and Public Info												
Initial Alert & Notification	5a1								M			
RESERVED	5a2											
Backup Alert & Notification	5a3											
Exception Area Alerting	5a4											
Subsequent Information & Instructions	5b1		M						M			
Support Operations/Facilities												
Reception Center Operations	6a1			M	P							
EW Monitoring & Decontamination	6b1											
Congregate Care	6c1					M						

Contaminated Injured Transport & Care	6d1												
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Table 3.1 - Summary of Exercise Evaluation (Continued. page 4/5)

<p style="text-align: center;">DATE: 2014-10-28 SITE: Palisades Nuclear Power Plant, MI M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated</p>			BER-HAB-Staging LNO-PNPP	BER--JC-Co PIO--PNPP	BER-Berrien Springs HS--Ev MD&R-	BER-Berrien Springs HS--Ev VM&D-	BER-Berrien Springs HS--CCC-	BER-Coloma HS-EW V&E M&D-	BER-Coloma HS--EvWMDR-	BER--Watervliet PS-EV2-	VAN-INP---	VAN-EOC---
Emergency Operations Management												
Mobilization	1a1		M								M	M
Facilities	1b1											M
Direction and Control	1c1		M									M
Communications Equipment	1d1		M	M		M		M	M	M	M	M
Equipment and Supplies to Support Operations	1e1		M	M		M		M	M			M
Protective Action Decision Making												
EW Exposure Control Decisions	2a1											M
PARs	2b1											M
PADs	2b2											M
PADs for Disabled/Functional Needs	2c1											M
Ingestion PADs	2d1											
RRR Decisions	2e1											
Protective Action Implementation												
EW Exposure Control Implementation	3a1			M				M	M			
KI Public/Institutionalized	3b1											M
PAD Implementation Disabled/Functional Needs	3c1											M
PAD Implementation Schools	3c2								M			M
TACP Establishment	3d1											M
Impediments	3d2											M
Implement Ingestion PADs	3e1											
Ingestion Pathway Decisions	3e2											
Implementation of RRR Decisions	3f1											
Field Measurement and Analysis												
RESERVED	4a1											
Field Team Management	4a2											
Field Team Operations	4a3											
Field Team Sampling	4b1											
Laboratory Operations	4c1											
Emergency Notification and Public Info												
Initial Alert & Notification	5a1											M
RESERVED	5a2											
Backup Alert & Notification	5a3											
Exception Area Alerting	5a4											
Subsequent Information & Instructions	5b1		M									M
Support Operations/Facilities												
Reception Center Operations	6a1			M	M							

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EW Monitoring & Decontamination	6b1						M	M				
Congregate Care	6c1					M						
Contaminated Injured Transport & Care	6d1											

Table 3.1 - Summary of Exercise Evaluation (Continued. page 5/5)

<p style="text-align: center;">DATE: 2014-10-28 SITE: Palisades Nuclear Power Plant, MI M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated</p>			VAN-VAN/HD--DosiStor-	VAN---DosBrief-EW/TACP	VAN---TACP-	VAN-HAB-ICP/UCP-PNPP	VAN-HAB-Staging-PNPP	VAN--JIC-Co PIO-- PNPP	VAN-EAS-WSJM/WCXT---	VAN--Bangor PS-EV2-	VAN--SHAES EMS-MSIT-	VAN-South Haven CH-MSIF-
Emergency Operations Management												
Mobilization	1a1					M	M	M				
Facilities	1b1											
Direction and Control	1c1					M	M	M				
Communications Equipment	1d1		M	M	M	M	M	M	M	M	M	M
Equipment and Supplies to Support Operations	1e1		M	M	M	M	M	M	M	M	M	M
Protective Action Decision Making												
EW Exposure Control Decisions	2a1					M						
PARs	2b1					M						
PADs	2b2					M						
PADs for Disabled/Functional Needs	2c1					M						
Ingestion PADs	2d1											
RRR Decisions	2e1											
Protective Action Implementation												
EW Exposure Control Implementation	3a1		M	M	M	M				M	M	M
KI Public/Institutionalized	3b1					M						
PAD Implementation Disabled/Functional Needs	3c1											
PAD Implementation Schools	3c2									M		
TACP Establishment	3d1				M							
Impediments	3d2											
Implement Ingestion PADs	3e1											
Ingestion Pathway Decisions	3e2											
Implementation of RRR Decisions	3f1											
Field Measurement and Analysis												
RESERVED	4a1											
Field Team Management	4a2											
Field Team Operations	4a3											
Field Team Sampling	4b1											
Laboratory Operations	4c1											
Emergency Notification and Public Info												
Initial Alert & Notification	5a1					M			M			
RESERVED	5a2											
Backup Alert & Notification	5a3											
Exception Area Alerting	5a4											
Subsequent Information & Instructions	5b1							M	M			
Support Operations/Facilities												
Reception Center Operations	6a1											
EW Monitoring & Decontamination	6b1											
Congregate Care	6c1											

Contaminated Injured Transport & Care	6d1													M	M
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3.3 Criteria Evaluation Summaries

3.3.1 Michigan Jurisdictions

3.3.1.1 State of Michigan - Initial Notification Point

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

- a. MET: 1.a.1, 1.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.2 State of Michigan - State Emergency Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.b.2, 2.c.1, 3.b.1, 3.d.1, 5.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: 2.a.1, 5.b.1.

ISSUE NO.: 23-14-2a1-P-01

ISSUE: In various locations throughout the State Plan, Nuclear Facilities Emergency Management Plan (NFEMP), and the County Plans, different expectations are provided to Emergency Workers and Radiological Safety Officers regarding Administrative Limits and under whose authority they can be exceeded. The NFEMP has stipulations for Non-State emergency workers that they must receive specific authorization from the SEOC to exceed their dose limit except as authorized under a county plan. It further explains that responsibility to exceed administrative limits resides with the Ops HP at the State Emergency Operation Center (SEOC).

The Monroe and Wayne County plans and procedures do not refer to the expectation that to exceed dose limits the State must be consulted. There is also inconsistency as to what dose levels (e.g. 1R, 3R, 25R) specific authorization is necessary.

REASON UNRESOLVED: Three plan issues were identified for the State of Michigan during the April 29, 2014, Enrico Fermi 2 Nuclear Power Plant REP exercise but were not resolved during this exercise. Due to the scope of the inter-agency coordination required to develop and implement the necessary changes and the time needed to conduct training for the offsite responders, the State of Michigan requested approval to continue using the existing plans and procedures for this exercise. The Interim Regional Assistance Committee Co-Chairs granted provisional approval to use the existing State and County plans and directed that any additional plan anomalies identified during this exercise would be documented and provided to the appropriate agencies for incorporation into their pending revisions, but that no new plan issues would be generated for these criteria. A FEMA Region V Staff Assistance Visit (SAV) and comprehensive state-wide, multi-jurisdictional Radiological Emergency Response Plan review is scheduled for the spring of 2015. These plan issues will be resolved in conjunction with the DC Cook Plume Exposure Pathway exercise in October, 2015.

ISSUE NO.: 23-14-5b1-P-02

ISSUE: Conflicting instructions were provided to dairy herd and livestock operators in Protective Action Areas (PAAs) 1, 2 and 3. During the Site Area Emergency, at 0950 hours, the Michigan Department of Agriculture and Rural Development (MDARD) issued an Agricultural Advisory for “Dairy Herd and Livestock Operators” in PAAs 1 through 5 which directed the sheltering of animals inside and placing them stored feed and water. Both the Governor’s Disaster Declaration at 0952 hours, and the State Emergency Operations Center (SEOC) New Release at 1002 hours, paraphrased the MDARD Agricultural Advisory. The pre-scripted message issued by the SEOC at 1115 hours, during the General Emergency, indicated that the Governor had ordered “Evacuation of all individuals living or working in Area(s) 1, 2 and 3. However, the attached “Evacuation Directive” ordered “...evacuation of all non-essential personnel in the following described areas in the

Counties of Wayne and Monroe: Areas 1, 2 and 3...” Definition of “non-essential personnel” was not provided, nor was there an indication that the previously issued Livestock Advisory had been rescinded.

At 1120 hours, MDARD issued Agricultural Advisories for “Food Establishments and Facilities, Feed Operators and Facilities, Fruit & Vegetable Growers and Distributors and Farmers, Gardeners, & Produce-Stand Operators in PAAs 1, 2 & 3. Again there was no mention was made of the previous livestock advisories, nor any indication that they had been formally rescinded.

At 1218 hours, News Release JIC 002 – JIC to Media, page 3, paragraph six, titled “Dairy Herd and Livestock Operators” reiterated the original MDARD Agricultural Advisory: “Until further notice and to the extent possible, all dairy and livestock animals in all five Areas must be sheltered in a barn or shed with doors/windows closed. Poultry should be caged in layer facilities with ventilation fans operating at low speed to minimize exposure to outside air. Pets and other domestic animals should be sheltered indoors or under cover. Animals should be fed only from stored feed and well water.”

REASON UNRESOLVED: Three plan issues were identified for the State of Michigan during the April 29, 2014, Enrico Fermi 2 Nuclear Power Plant REP exercise but were not resolved during this exercise. Due to the scope of the inter-agency coordination required to develop and implement the necessary changes and the time needed to conduct training for the offsite responders, the State of Michigan requested approval to continue using the existing plans and procedures for this exercise. The Interim Regional Assistance Committee Co-Chairs granted provisional approval to use the existing State and County plans and directed that any additional plan anomalies identified during this exercise would be documented and provided to the appropriate agencies for incorporation into their pending revisions, but that no new plan issues would be generated for these criteria. A FEMA Region V Staff Assistance Visit (SAV) and comprehensive state-wide, multi-jurisdictional Radiological Emergency Response Plan review is scheduled for the spring of 2015. These plan issues will be resolved in conjunction with the DC Cook Plume Exposure Pathway exercise in October, 2015.

3.3.1.3 State of Michigan - Technical Support Group

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

- a. MET: 2.b.1, 2.b.2, 2.c.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: 2.a.1.

ISSUE NO.: 23-14-2a1-P-03

ISSUE: Michigan Department of Environmental Quality 2014 Nuclear Facilities Emergency Management Plan (NFEMP) specified that emergency workers were limited to Total Effective Dose Equivalent (TEDE) limits of 5 rem for emergency operations, with 1 R per day and 3 R per event administrative exposure limits. The Plan did not specify a Direct-Reading Dosimeter (DRD) correction factor to account for internal component of TEDE. While Health Physics Response Team (HPRT) member TEDE may be calculated in the Field Team Center using the Team Dose tab in the DoseModel program, there is no process to ensure other emergency workers' TEDE is calculated.

REASON UNRESOLVED: Three plan issues were identified for the State of Michigan during the April 29, 2014, Enrico Fermi 2 Nuclear Power Plant REP exercise but were not resolved during this exercise. Due to the scope of the inter-agency coordination required to develop and implement the necessary changes and the time needed to conduct training for the offsite responders, the State of Michigan requested approval to continue using the existing plans and procedures for this exercise. The Interim Regional Assistance Committee Co-Chairs granted provisional approval to use the existing State and County plans and directed that any additional plan anomalies identified during this exercise would be documented and provided to the appropriate agencies for incorporation into their pending revisions, but that no new plan issues would be generated for these criteria. A FEMA Region V Staff Assistance Visit (SAV) and comprehensive state-wide, multi-jurisdictional

Radiological Emergency Response Plan review is scheduled for the spring of 2015.
These plan issues will be resolved in conjunction with the DC Cook Plume Exposure
Pathway exercise in October, 2015.

3.3.1.4 State of Michigan - Field Team Center SimCell

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

- a. MET: 1.a.1, 4.a.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.5 State of Michigan - Allegan County Emergency Operations Center - State Liaison

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.6 State of Michigan - Berrien County Emergency Operations Center - State Liaison

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None

- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.7 State of Michigan - Van Buren County Emergency Operations Center - State Liaison

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.8 State of Michigan - HAB Incident/Unified Command Post Liaison - PNPP

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

3.3.1.9 State of Michigan - HAB Staging Area Liaison - PNPP

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

3.3.1.10 State of Michigan - Joint Information Center - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.11 State of Michigan - Joint Information Center - Rumor Control - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.12 State of Michigan - Berrien Springs High School - Evacuee Monitoring and Decontamination - MDEQ Technician

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.a.1, 6.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.13 State of Michigan - Coloma High School - Emergency Worker Monitoring and Decontamination - MDEQ Technician

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.14 State of Michigan - Otsego High School - Evacuee Monitoring and Decontamination - MDEQ Technician

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.15 State of Michigan - South Haven Area Emergency Services - Ambulance - Medical Service - Transportation- MDEQ Technician

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.16 State of Michigan - South Haven Community Hospital - Medical Service - Facility - MDEQ Technician

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2 Risk Jurisdictions

3.3.2.1 Allegan County - Initial Notification Point

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

- a. MET: 1.a.1, 1.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.2 Allegan County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.3 Allegan County - Dosimetry Briefing - Emergency Worker / Traffic and Access Control Point

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

- a. MET: 1.e.1, 3.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None

- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.4 Allegan County - Traffic and Access Control Point

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.5 Allegan County - HAB Incident/Unified Command Post Liaison - PNPP

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

3.3.2.6 Allegan County - HAB Staging Area Liaison - PNPP

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

3.3.2.7 Allegan County - Joint Information Center County PIO - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.8 Berrien County - Initial Notification Point

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

- a. MET: 1.a.1, 1.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.9 Berrien County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.10 Berrien County - Dosimetry Briefing - EOC - Emergency Worker / Traffic and Access Control Point

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

- a. MET: 1.e.1, 3.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.11 Berrien County - Traffic and Access Control Point

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.12 Berrien County - HAB Incident/Unified Command Post Liaison - PNPP

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

3.3.2.13 Berrien County - HAB Staging Area Liaison - PNPP

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

3.3.2.14 Berrien County - Joint Information Center County PIO - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.15 Berrien County - Watervliet Public Schools - Evacuation School

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.c.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None

- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.16 Van Buren County - Initial Notification Point

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

- a. MET: 1.a.1, 1.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.17 Van Buren County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.18 Van Buren County - Van Buren Health Department - Dosimetry Storage

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

3.3.2.19 Van Buren County - Dosimetry Briefing - Emergency Worker / Traffic and Access Control Point

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

- a. MET: 1.d.1, 1.e.1, 3.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.20 Van Buren County - Traffic and Access Control Point

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.21 Van Buren County - HAB Incident/Unified Command Post - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 5.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.22 Van Buren County - HAB Staging Area - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.23 Van Buren County - Joint Information Center County PIO - PNPP

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.24 Van Buren County - Emergency Alert System Radio Station WSJM/WCXT

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

- a. MET: 1.d.1, 1.e.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.25 Van Buren County - Bangor Public Schools - Evacuation School

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.c.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.26 Van Buren County - South Haven Area Emergency Services - Medical Service - Transportation

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3 Support Jurisdictions

3.3.3.1 Allegan County - Otsego High School - Evacuee Monitoring and Decontamination

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.2 Allegan County - Otsego High School - Evacuee Monitoring and Decontamination of Vehicles

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

- a. MET: None
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: 6.a.1.

ISSUE NO.: 44-14-6a1-P-01

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

CONDITION: The Allegan County Radiological Emergency Procedure requires that vehicle interior surveys be conducted with a CDV-700 instrument with a GM pancake probe after depositing passengers at the personnel monitoring station at the Evacuee Monitoring and Decontamination facility at Otsego High School. During the exercise conducted on October 29, 2014, monitoring of the vehicle interior with the CDV-700 was not performed.

POSSIBLE CAUSE: The evacuee vehicle traffic pattern shown on the Site Plan in the Allegan County Public Reception/Decontamination Centers and Congregate Care Centers Standard Operating Procedure version of September 2014 is different than the previous version of September 2012. FEMA received the 2014 version of the SOP via an email from the Lead State Controller time stamped at 3:13 PM CDT on October 24, 2014. The cause was attributed to inadequate training which resulted in this important procedural step being omitted.

REFERENCE: NUREG-0654/FEMA-REP-1, Planning Standard K.5.b

EFFECT: The failure to perform a contamination survey of the interior of an evacuee's vehicle, regardless of whether the vehicles' exterior was contaminated, could have resulted in unnecessary exposure of the vehicle owner to radioactive

contamination at some later point.

RECOMMENDATION: Align the Standard Operating Procedure and Responder training; This criteria needs to be re-demonstrated.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.3 Allegan County - Otsego High School - Congregate Care Center

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

- a. MET: 1.d.1, 1.e.1, 6.c.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.4 Berrien County - Berrien Springs High School - Evacuee Monitoring, Decontamination & Registration

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.5 Berrien County - Berrien Springs High School - Evacuee Vehicle Monitoring and Decontamination

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

- a. MET: 6.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.6 Berrien County - Berrien Springs High School - Congregate Care Center

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

- a. MET: 1.d.1, 1.e.1, 6.c.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.7 Berrien County - Coloma High School - Emergency Worker Vehicle and Equipment Monitoring and Decontamination

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

- a. MET: 6.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.3.8 Berrien County - Coloma High School - Evacuee/Emergency Worker Monitoring and Decontamination, Registration of Evacuees

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.4 Private Organizations

3.3.4.1 Van Buren County - South Haven Community Hospital - Medical Service - Facility

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

SECTION 4: CONCLUSION

Based on the results of the October 28, 2014 exercise, the off-site radiological emergency response plans and preparedness for the State of Michigan and affected local jurisdictions, site-specific to the Palisades Nuclear Power Plant, can be implemented and are adequate to provide reasonable assurance that appropriate measures can be taken off-site to protect the health and safety of the public in the event of a radiological emergency at the site. Therefore, the Title 44 CFR, Part 350, approval of the offsite radiological emergency response plans and preparedness for the State of Michigan site-specific to the Palisades Nuclear Power Plant, remain in effect.

APPENDIX A: IMPROVEMENT PLAN

Issue Number: 44-14-6a1-P-01		Criterion: 6a1
<p>ISSUE: The Allegan County Radiological Emergency Procedure requires that vehicle interior surveys be conducted with a CDV-700 instrument with a GM pancake probe after depositing passengers at the personnel monitoring station at the Evacuee Monitoring and Decontamination facility at Otsego High School. During the exercise conducted on October 29, 2014, monitoring of the vehicle interior with the CDV-700 was not performed.</p> <p>RECOMMENDATION: Align the Standard Operating Procedure and Responder training; This criteria needs to be re-demonstrated.</p>		
CORRECTIVE ACTION DESCRIPTION:		
CAPABILITY:	PRIMARY RESPONSIBLE AGENCY:	
CAPABILITY ELEMENT:	START DATE:	
AGENCY POC:	ESTIMATED COMPLETION DATE:	

Issue Number: 23-14-2a1-P-01		Criterion: 2a1
<p>ISSUE: In various locations throughout the State Plan, Nuclear Facilities Emergency Management Plan (NFEMP), and the County Plans, different expectations are provided to Emergency Workers and Radiological Safety Officers regarding Administrative Limits and under whose authority they can be exceeded. The NFEMP has stipulations for Non-State emergency workers that they must receive specific authorization from the SEOC to exceed their dose limit except as authorized under a county plan. It further explains that responsibility to exceed administrative limits resides with the Ops HP at the State Emergency Operation Center (SEOC). The Monroe and Wayne County plans and procedures do not refer to the expectation that to exceed dose limits the State must be consulted. There is also inconsistency as to what dose levels (e.g. 1R, 3R, 25R) specific authorization is necessary.</p> <p>RECOMMENDATION: Provide consistency throughout State and County Plans and Procedures for exceeding Emergency Worker dose limits.</p>		
CORRECTIVE ACTION DESCRIPTION: Revise plans and procedures to eliminate these inconsistencies.		
CAPABILITY: Responder Safety and Health	PRIMARY RESPONSIBLE AGENCY: Michigan State Police Emergency Management and Homeland Security Division	
CAPABILITY ELEMENT: Planning	START DATE: 2014-04-29	
AGENCY POC: Tonya Nobach 517-333-5028	ESTIMATED COMPLETION DATE: 2015-01-01	

Issue Number: 23-14-5b1-P-02		Criterion: 5b1
<p>ISSUE: Conflicting instructions were provided to dairy herd and livestock operators in Protective Action Areas (PAAs) 1, 2 and 3. During the Site Area Emergency, at 0950 hours, the Michigan Department of Agriculture and Rural Development (MDARD) issued an Agricultural Advisory for “Dairy Herd and Livestock Operators” in PAAs 1 through 5 which directed the sheltering of animals inside and placing them stored feed and water. Both the Governor’s Disaster Declaration at 0952 hours, and the State Emergency Operations Center (SEOC) New Release at 1002 hours, paraphrased the MDARD Agricultural Advisory. The pre-scripted message issued by the SEOC at 1115 hours, during the General Emergency, indicated that the Governor had ordered “Evacuation of all individuals living or working in Area(s) 1, 2 and 3. However, the attached “Evacuation Directive” ordered “...evacuation of all non-essential personnel in the following described areas in the Counties of Wayne and Monroe: Areas 1, 2 and 3...” Definition of “non-essential personnel” was not provided, nor was there an indication that the previously issued Livestock Advisory had been rescinded.</p> <p>At 1120 hours, MDARD issued Agricultural Advisories for “Food Establishments and Facilities, Feed Operators and Facilities, Fruit & Vegetable Growers and Distributors and Farmers, Gardeners, & Produce-Stand Operators in PAAs 1, 2 & 3. Again there was no mention was made of the previous livestock advisories, nor any indication that they had been formally rescinded.</p> <p>At 1218 hours, News Release JIC 002 – JIC to Media, page 3, paragraph six, titled “Dairy Herd and Livestock Operators” reiterated the original MDARD Agricultural Advisory: “Until further notice and to the extent possible, all dairy and livestock animals in all five Areas must be sheltered in a barn or shed with doors/windows closed. Poultry should be caged in layer facilities with ventilation fans operating at low speed to minimize exposure to outside air. Pets and other domestic animals should be sheltered indoors or under cover. Animals should be fed only from stored feed and well water.”</p>		
<p>RECOMMENDATION: Review and update existing plans, procedures and checklists and develop a process that ensures coordination between the SEOC and JIC regarding all inter-agency public information messaging and Protective Action Orders issued prior to the establishment of the JIC. Specific focus should be given to identifying and rescinding superseded information which has been overcome by events during a rapidly escalating response.</p>		
<p>CORRECTIVE ACTION DESCRIPTION: Revise plans, procedures and checklists and develop a process that ensures such coordination between the SEOC and JIC.</p>		
<p>CAPABILITY: Emergency Public Information and Warning</p>	<p>PRIMARY RESPONSIBLE AGENCY: Michigan State Police Emergency Management and Homeland Security Division</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE: 2014-04-29</p>	
<p>AGENCY POC: Tonya Nobach 517-333-5028</p>	<p>ESTIMATED COMPLETION DATE: 2015-01-01</p>	

Issue Number: 23-14-2a1-P-03		Criterion: 2a1
<p>ISSUE: Michigan Department of Environmental Quality 2014 Nuclear Facilities Emergency Management Plan (NFEMP) specified that emergency workers were limited to Total Effective Dose Equivalent (TEDE) limits of 5 rem for emergency operations, with 1 R per day and 3 R per event administrative exposure limits. The Plan did not specify a Direct-Reading Dosimeter (DRD) correction factor to account for internal component of TEDE. While Health Physics Response Team (HPRT) member TEDE may be calculated in the Field Team Center using the Team Dose tab in the DoseModel program, there is no process to ensure other emergency workers' TEDE is calculated.</p>		
<p>RECOMMENDATION: Provide consistency throughout State and County Plans and Procedures for exceeding emergency worker dose limits.</p> <ol style="list-style-type: none"> 1. Describe the method to be used for converting DRD readings to TEDE in the State Plan and/or procedures. 2. Develop and document a method to trigger the performance of TEDE calculations after field measurements (e.g., air samples) are available to support use of the Team Dose tab in the DoseModel program, or when an emergency worker receives 1 R, whichever occurs first. 3. Ensure that the dosimeter correction factor that is calculated based on field measurements noted above is periodically re-assessed as more measurements are available and is made available for use by any ERO members who may enter the EPZ as part of a work assignment. 		
<p>CORRECTIVE ACTION DESCRIPTION: Revise plans and procedures to eliminate these inconsistencies.</p>		
<p>CAPABILITY: Responder Safety and Health</p>	<p>PRIMARY RESPONSIBLE AGENCY: Michigan Department of Environmental Quality</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE: 2014-04-29</p>	
<p>AGENCY POC: Ken Yale 517-930-5784</p>	<p>ESTIMATED COMPLETION DATE: 2015-01-01</p>	

APPENDIX B: EXERCISE TIMELINE

Table 1, on the following page, presents the times at which key events and activities occurred during the Palisades Nuclear Power Plant (PNPP) Hostile Action Based (HAB) Partial Participation Plume Exposure Pathway Radiological Emergency Preparedness (REP) exercise conducted on October 28, 2014. Also included are times notifications were made to the participating jurisdictions/functional entities.

Table 1 - Exercise Timeline
DATE: 2014-10-28, SITE: Palisades Nuclear Power Plant, MI

Emergency Classification Level or Event	Time Utility Declared	MI-SEOC	MI-FTC SC	ALG-EOC---	BER-EOC---	VAN-EOC---
Unusual Event	N/A	N/A	N/A	N/A	N/A	N/A
Alert	N/A	N/A	N/A	N/A	N/A	N/A
Site Area Emergency	0812	0828	N/A	0818	0827	0820
General Emergency	1144	1148	1210	1204	1156	1146
Simulated Rad. Release Started	N/A	N/A	N/A	N/A	N/A	N/A
Simulated Rad. Release Terminated	N/A	N/A	N/A	N/A	N/A	N/A
Facility Declared Operational		0916	0916	0900	0909	0837
Declaration of State of Emergency		0911	0911	0854	0845	0845
Exercise Terminated		1258	1258	1256	1257	1255
Early Precautionary Actions:		0922	1208	0941	0844	0846
1st Protective Action Decision:		1205	1152	1215	N/A	1210
1st Siren Activation		N/A	N/A	N/A	N/A	1212
1st EAS or EBS Message		N/A	N/A	N/A	N/A	1219
2nd Protective Action Decision:						
2nd Siren Activation						
2nd EAS or EBS Message						
3rd Protective Action Decision:						
3rd Siren Activation						
3rd EAS or EBS Message						
4th Protective Action Decision:						
4th Siren Activation						
4th EAS or EBS Message						
5th Protective Action Decision:						
5th Siren Activation						
5th EAS or EBS Message						
6th Protective Action Decision:						
6th Siren Activation						
6th EAS or EBS Message						
KI Administration Decision:		1205	N/A	1215	1215	1215

APPENDIX C: EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel that evaluated the Palisades Nuclear Power Plant (PNPP) Hostile Action Based (HAB) Partial Participation Plume Exposure Pathway Radiological Emergency Preparedness (REP) Exercise on October 28, 2014. The list includes the evaluation team leadership and all evaluators. The organization each evaluator represents is indicated by the following abbreviations:

Department of Homeland Security / Federal Emergency Management Agency (DHS/FEMA)

Title	Name	Organization
Radiological Assistance Committee, Co-Chair	Stephen Tulley	DHS/FEMA
Exercise Director	Dwaine Warren	DHS/FEMA
Observer	Sean O'Leary	DHS/FEMA
Site Specialist	Karl Rabenhorst	DHS/FEMA
Team Leader - Michigan	Mark Ludeking	DHS/FEMA
Team Leader - Van Buren County	James King	DHS/FEMA
Team Leader - Berrien County	David Persuad	DHS/FEMA
Team Leader - Allegan County	Clinton Crackel	DHS/FEMA
ICF Consulting		
Regional Coordinator	John Wills	ICF

DATE: 2014-10-28, SITE: Palisades Nuclear Power Plant, MI

LOCATION	EVALUATOR	AGENCY
State of Michigan - Initial Notification Point	John Wills	ICFI
State of Michigan - State Emergency Operations Center	Todd Gemske John Wills	FEMA RV ICFI
State of Michigan - Technical Support Group	Michael Howe	FEMA HQ
State of Michigan - Field Team Center SimCell	Paul Ward	FEMA HQ
State of Michigan - Allegan County Emergency Operations Center - State Liaison	Kara Scott	FEMA RV
State of Michigan - Berrien County Emergency Operations Center - State Liaison	Gregg Dawkins	ICFI
State of Michigan - Van Buren County Emergency Operations Center - State Liaison	Edward Golinski	FEMA RV
State of Michigan - HAB Incident/Unified Command Post Liaison - PNPP		
State of Michigan - HAB Staging Area Liaison - PNPP		
State of Michigan - Joint Information Center - PNPP	Paul Nied	ICFI
State of Michigan - Joint Information Center - Rumor Control - PNPP	Meg Swearingen	ICFI
State of Michigan - Berrien Springs High School - Evacuee Monitoring and Decontamination - MDEQ Technician	Christopher Bellone	FEMA HQ
State of Michigan - Coloma High School - Emergency Worker Monitoring and Decontamination - MDEQ Technician	Janet Hlavaty-LaPosa	FEMA RX
State of Michigan - Otsego High School - Evacuee Monitoring and Decontamination - MDEQ Technician	Thomas Essig	ICFI
State of Michigan - South Haven Area Emergency Services - Ambulance - Medical Service - Transportation- MDEQ Technician	Paul Ward	FEMA HQ
State of Michigan - South Haven Community Hospital - Medical Service - Facility - MDEQ Technician	Christopher Bellone	FEMA HQ
Allegan County - Initial Notification Point	Gary Goldberg	ICFI
Allegan County - Emergency Operations Center	*Clinton Crackel Gary Goldberg Kara Scott	FEMA RV ICFI FEMA RV
Allegan County - Dosimetry Briefing - Emergency Worker / Traffic and Access Control Point	Thomas Essig	ICFI
Allegan County - Traffic and Access Control Point	Thomas Essig	ICFI
Allegan County - HAB Incident/Unified Command Post Liaison - PNPP		
Allegan County - HAB Staging Area Liaison - PNPP		
Allegan County - Joint Information Center County PIO - PNPP	Meg Swearingen	ICFI
Berrien County - Initial Notification Point	James Greer	ICFI
Berrien County - Emergency Operations Center	Gregg Dawkins James Greer	ICFI ICFI
Berrien County - Dosimetry Briefing - EOC - Emergency Worker / Traffic and Access Control Point	Cheryl Weaver	ICFI
Berrien County - Traffic and Access Control Point	Cheryl Weaver	ICFI
Berrien County - HAB Incident/Unified Command Post Liaison - PNPP		
Berrien County - HAB Staging Area Liaison - PNPP		
Berrien County - Joint Information Center County PIO - PNPP	Meg Swearingen	ICFI
Berrien County - Watervliet Public Schools - Evacuation School	Janet Hlavaty-LaPosa	FEMA RX

Unclassified
Radiological Emergency Preparedness Program (REP)

After Action Report/Improvement Plan

Palisades Nuclear Power Plant

Van Buren County - Initial Notification Point	Gary Bolender	ICFI
Van Buren County - Emergency Operations Center	Gary Bolender Edward Golinski *James King	ICFI FEMA RV FEMA RV
Van Buren County - Van Buren Health Department - Dosimetry Storage		
Van Buren County - Dosimetry Briefing - Emergency Worker / Traffic and Access Control Point	John Zeidler	ICFI
Van Buren County - Traffic and Access Control Point	John Zeidler	ICFI
Van Buren County - HAB Incident/Unified Command Post - PNPP	Carl Bebrich Don Daniel Christopher Roe Richard Smith	FEMA RV FEMA RV FEMA RV ICF
Van Buren County - HAB Staging Area - PNPP	Danny Loomis	ICFI
Van Buren County - Joint Information Center County PIO - PNPP	Paul Nied	ICFI
Van Buren County - Emergency Alert System Radio Station WSJM/WCXT	Carol D. Shepard	ICFI
Van Buren County - Bangor Public Schools - Evacuation School	Marcy Campbell	ICFI
Van Buren County - South Haven Area Emergency Services - Medical Service - Transportation	Paul Ward	FEMA HQ
Allegan County - Otsego High School - Evacuee Monitoring and Decontamination	Thomas Essig	ICFI
Allegan County - Otsego High School - Evacuee Monitoring and Decontamination of Vehicles	Gary Goldberg	ICFI
Allegan County - Otsego High School - Congregate Care Center	Gary Goldberg	ICFI
Berrien County - Berrien Springs High School - Evacuee Monitoring, Decontamination & Registration	Marcy Campbell	ICFI
Berrien County - Berrien Springs High School - Evacuee Vehicle Monitoring and Decontamination	Christopher Bellone	FEMA HQ
Berrien County - Berrien Springs High School - Congregate Care Center	Michael Meshenberg	ICFI
Berrien County - Coloma High School - Emergency Worker Vehicle and Equipment Monitoring and Decontamination	Janet Hlavaty-LaPosa	FEMA RX
Berrien County - Coloma High School - Evacuee/Emergency Worker Monitoring and Decontamination, Registration of Evacuees	Michael Meshenberg	ICFI
Van Buren County - South Haven Community Hospital - Medical Service - Facility	Christopher Bellone	FEMA HQ
* Team Leader		

APPENDIX D: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAESA	Allegan Area Educational Service Agency
ACEMD	Allegan County Emergency Management Director
AD	Administrative Director
ARC	American Red Cross
ARCA	Area Requiring Corrective Action
BCEOC	Berrien County Emergency Operations Center
BP	Blood Pressure
BSHS	Berrien Springs High School
BZN	Buffer Zone Nurse
BZPP	Buffer Zone Protection Points
CCC	Congregate Care Center
CEO	Chief Executive Official
CIMS	Critical Incident Management System
CPM	Counts Per Minute
CTFD	Covert Township Fire Department
CTH	Covert Township Hall
CTPD	Covert Township Police Department
DCO	Dosimetry Control Officer
DO	Duty Officer
DRD	Direct Reading Dosimeter
EAL	Emergency Action Levels
EAS	Emergency Alert System
ECL	Emergency Classification Level
ED	Emergency Department
EMA	Emergency Management Agency
EMD	Emergency Management Director
EMHSD	Emergency Management Homeland Security Division
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EPD	Electronic Personal Dosimeter
EPZ	Emergency Planning Zone
EST	Emergency Support Team
EW	Emergency Workers

FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Team
FTC	Field Team Coordinator
GE	General Emergency
GETS	Government Emergency Telecommunications System
HAB	Hostile Action Based
HERN	Hospital Emergency Radio Network
HPRT	Health Physics Response Team
HR	Heart Rate
IC	Incident Commander
ICP	Incident Command Post
ISD	Intermediate School District
JIC	Joint Information Center
LEIN	Law Enforcement Information Network
MARS	Military Auxiliary Radio System
MIOC	Michigan Intelligence Operations Center
MPSCS	Michigan Public Safety Communication System
MSP	Michigan State Police
NFEMP	Nuclear Facilities Emergency Management Plan
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
OSLD	Optically Stimulated Luminescent Dosimeters
PAA	Protective Action Areas
PAD	Protective Action Decisions
PAO	Protective Action Order
PAR	Protective Action Recommendations
PHD	Public Health Department
PIO	Public Information Officer
PNPP	Palisades Nuclear Power Plant
PPE	Personal Protective Equipment
PRC	Public Reception Center
PRD	Personal Record Dosimeter
PSCC	Public Safety Communication Center
PW	Public Works
RAC	Regional Assistance Committee
RACES	Radio Amateur Civil Emergency Service
REA	Radiation Emergency Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
RESA	Regional Educational Service Agency

RR	Respiratory Rate
SA	Staging Area
SAE	Site Area Emergency
SAM	Staging Area Manager
SAV	Staff Assistance Visit
SEOC	State Emergency Operations Center
SHAES	South Haven Area Emergency Services
SHHS	South Haven Health System
SOP	Standard Operating Procedure
TEDE	Total Effective Dose Equivalent
TSC	Technical Support Center
TSG	Technical Support Group
UC	Unified Command
VBC	Van Buren County
VBEOC	Van Buren Emergency Operations Center
VBISD	Van Buren Intermediate School District
VHF	Very High Frequency
VOIP	Voice Over Internet Protocol
WPS	Wireless Priority Service

APPENDIX E: EXERCISE PLAN

This appendix lists the exercise criteria, which were scheduled for demonstration in the Palisades Nuclear Power Plant Hostile Action Based (HAB) Partial Participation Plume Exposure Pathway Radiological Emergency Preparedness (REP) Exercise on October 28, 2014. To protect Personal Identifying Information embedded throughout the full Exercise Plan, only the offsite extent-of-play agreement accepted by DHS/FEMA Region V on October 9, 2014 is provided in this section. The exercise criteria, contained in the FEMA REP Program Manual, dated June 2013, represent a functional translation of the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980. Because the exercise criteria are intended for use at all nuclear power plant sites, and because of variations among offsite plans and procedures, an extent-of-play agreement is prepared by the State and accepted by DHS/FEMA to provide evaluators with guidance on expected actual demonstration of the criteria.

Palisades REP Exercise Objectives October 28, 2014

Extent of Play Agreements for Allegan County, Berrien County, Van Buren County and the State of Michigan

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. The State Emergency Operations Center (SEOC), MSP Operations/Michigan Intelligence Operations Center (MIOC) and Field Team Center (FTC) SimCell will be activated. State personnel reporting to the SEOC will be mobilized in accordance with procedures.
2. State personnel reporting to the county Emergency Operation Center (EOC) will be pre-staged and will report when mobilized by the SEOC (approximately 15-20 minutes after play).
3. State personnel reporting to the FTC SimCell will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 30 minutes after the request for the FTC SimCell).
4. State personnel reporting to the Van Buren County Incident Command Post (ICP) will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
5. State personnel reporting to the Joint Information Center (JIC) will be pre-staged and will begin participation after the arrival of Allegan, Berrien and Van Buren Counties' JIC personnel.
6. State personnel involved in out of sequence demonstrations will be pre-staged.
7. A roster will be provided to demonstrate 24-hour staffing.

Allegan County

1. The Allegan County EOC will be activated and mobilized in accordance with procedures.
2. ICP players will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
3. Allegan County JIC personnel will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
4. All personnel involved in out of sequence demonstrations will be pre-staged.
5. A roster will be provided to demonstrate 24-hour staffing of the county EOC.

Berrien County

1. The Berrien County EOC will be activated and mobilized in accordance with procedures.
2. ICP players will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
3. Berrien County JIC personnel will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
4. All personnel involved in out of sequence demonstrations will be pre-staged.
5. A roster will be provided to demonstrate 24-hour staffing of the county EOC.

Van Buren County

1. The Van Buren County EOC will be activated and mobilized in accordance with procedures.
2. ICP players will be pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play). Staging area will be partially pre-staged.
3. Van Buren County JIC personnel will pre-staged and will report at the time determined by the scenario and controller injects (approximately 15-20 minutes after play).
4. All personnel involved in out of sequence demonstrations will be pre-staged.
5. A roster will be provided to demonstrate 24-hour staffing of the county EOC.

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

State of Michigan

1. The SEOC is maintained in operational readiness and set up will not be demonstrated for evaluation.
2. The JIC is maintained in operational readiness and set up will not be demonstrated for evaluation.
3. This criterion was demonstrated at the DC Cook exercise in 2013.

Allegan County

The EOC is maintained in operational readiness and will be demonstrated for evaluation.

Berrien County

The EOC is maintained in operational readiness and will not be demonstrated for evaluation. This was completed at the DC Cook exercise in 2013.

Van Buren County

The EOC is maintained in operational readiness and will be demonstrated for evaluation.

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, Allegan, Berrien and Van Buren Counties

1. This criterion will be demonstrated at the SEOC, counties EOC, ICP, Staging Area, and the JIC.

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, Allegan, Berrien and Van Buren Counties

1. This criterion will be demonstrated by the SEOC, counties EOC, ICP, Staging Area, JIC, Public Reception/Emergency Worker Decontamination Centers, and Access Control, and applicable out-of-sequence demonstrations.

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. Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the SEOC, JIC, counties EOC, ICP, FTC SimCell, Staging Area and out-of-sequence events.
2. Additional supplies of potassium iodide are stored at the Michigan State Police Emergency Management and Homeland Security Division (MSP/EMHSD) office in Lansing. This was demonstrated at the FERMI exercise 29 April 2014 and will not be demonstrated.
3. Documentation related to emergency worker KI shelf life extension is maintained by MSP/EMHSD and will be provided to FEMA along with instrument calibration data.

Allegan County

1. Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the EOC, JIC and out of sequence events.
2. ACSO traffic and access control personnel will demonstrate personal & emergency vehicle equipment and knowledge of how/where to obtain additional equipment at the County EOC.
3. Potassium iodide and dosimetry will be demonstrated at the County EOC.
4. Records will be provided to FEMA.

Berrien County

1. Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the EOC, JIC and out of sequence events.
2. Traffic and access control personnel will demonstrate personal & emergency vehicle equipment, and knowledge of how/where to obtain additional equipment at the County EOC.
3. Potassium iodide and dosimetry will be demonstrated at the County EOC.
4. Records will be provided to FEMA.

Van Buren County

1. Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the EOC, JIC, ICP, Staging Area and out of sequence events.
2. Traffic and access control personnel will demonstrate personal & emergency vehicle equipment, and knowledge of how/where to obtain additional equipment at the County EOC.
3. Potassium iodide and dosimetry will be demonstrated at the County EOC.
4. Records will be provided to FEMA.

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 criterion will be demonstrated by the Incident Management Group in the SEOC in conjunction with appropriate support staff including the Technical Support Group (TSG) and the Michigan Department of Community Health (MDCH).
2. Authorization to exceed State exposure limits was successfully demonstrated by the Operations Health Physicist in the SEOC on April 29, 2014 during the Fermi 2 HAB exercise and will not be demonstrated this exercise.

Allegan County

1. Allegan 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."

Berrien County

1. 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.
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 an "Interim Protective Measures Decision" in lieu of a "Protective Action Decision."

Van Buren County

1. Van Buren 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 the 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

1. The TSG in the SEOC will evaluate licensee and FTC SimCell provided information, and complete an independent analysis of scenario data.
2. Dose assessment will be conducted as required by the scenario at the FTC SimCell (**not evaluated**) and the results will be sent to the SEOC for further analysis during the plume phase.

Allegan County

1. Allegan 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.

Berrien County

1. 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.

Van Buren County

1. Van Buren 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.

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 criterion will be demonstrated by the Incident Management Group in the SEOC in conjunction with appropriate support staff including the TSG and the Michigan Department of Community Health (MDCH).
2. The Potassium Iodide (KI) policy will be demonstrated at the General Emergency declaration through SEOC discussion and a press release at the JIC.

Allegan County

1. Allegan County may implement protective measures prior to a Governor's Declaration to warn and protect the public and offsite responders 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.

Berrien County

1. Berrien County may implement protective measures prior to a Governor's Declaration to warn and protect the public and offsite responders 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.

Van Buren County

1. Van Buren County may implement protective measures prior to a Governor's Declaration to warn and protect the public and offsite responders 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.

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 criterion will be demonstrated by the Incident Management Group and TSG 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.

Allegan County

1. Allegan 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.

Berrien County

1. 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.

Van Buren County

1. Van Buren 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 Protective Action Decisions 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.

This criterion will not be demonstrated during this exercise.

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.

This was demonstrated successfully on April 29, 2014 at the Fermi 2 HAB exercise.

Allegan County

Allegan County will demonstrate this criterion through out-of-sequence TACP activities at the County EOC and Public Monitoring and Decontamination Center at Otsego High School.

Berrien County

1. Berrien County will demonstrate this criterion through out-of-sequence activities for the center staff at the Emergency Worker Decontamination Centers **at Coloma High School (Monday October 27, 2014 at 6:00pm)**.
2. Berrien County will demonstrate this criterion through out-of-sequence TACP activities at the County EOC for emergency responders.

Van Buren County

1. Van Buren County will demonstrate this criterion through out-of-sequence TACP activities at the County EOC.

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

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. The State will demonstrate this objective at the SEOC and through decision-making and directives to implement appropriate Protective Action Orders.

Allegan County

1. Allegan County will demonstrate the ability (simulate) to administer KI to institutionalized individuals.

Berrien County

1. Berrien County will demonstrate the ability (simulate) to administer KI to institutionalized individuals.

Van Buren County

1. Van Buren County will demonstrate the ability (simulate) to administer KI to institutionalized individuals.

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.

Allegan County

1. This criterion will be demonstrated in the EOC via staff discussions regarding evacuation of hospitals, nursing homes, correctional facilities, mobility impaired individuals, and transportation dependent. These discussions will be documented in situation logs.
2. Actual contacts to special population groups will not be made. One simulated call will be logged as such.
3. Allegan County will contact a minimum of four providers of transportation services, which may include public transit authorities, school systems for buses, ambulance services, or fire/rescue services. There will be no discussion of scenario information during these calls.

Berrien County

1. This criterion will be demonstrated in the EOC via staff discussions regarding evacuation of hospitals, nursing homes, correctional facilities, mobility impaired individuals, and transportation dependent. These discussions will be documented in situation logs.
2. Actual contacts to special population groups will not be made. One simulated call will be logged as such.
3. Berrien County will contact a minimum of four providers of transportation services, which may include public transit authorities, school systems for buses, ambulance services, or fire/rescue services. There will be no discussion of scenario information during these calls.

Van Buren County

1. This criterion will be demonstrated in the EOC via staff discussions regarding evacuation of hospitals, nursing homes, correctional facilities, mobility impaired individuals, and transportation dependent. These discussions will be documented in situation logs.
2. Actual contacts to special population groups will not be made. One simulated call will be logged as such.
3. Van Buren County will contact a minimum of four providers of transportation services, which may include public transit authorities, school systems for buses, ambulance services, or fire/rescue services. There will be no discussion of scenario information during these calls.

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

State of Michigan

This criterion does not apply.

Allegan County

This criterion does not apply.

Berrien County

1. This criterion will be demonstrated by Berrien County EOC as driven by the scenario.
2. EV-2 interview will be conducted in: **Watervliet High School (Monday October 27, 2014 at 10:00am).**
3. Refer to the Table of Exercise Demonstrations for specific times. This will be conducted out-of-sequence.

Van Buren County

1. This criterion will be demonstrated by Van Buren County EOC as driven by the scenario.
2. EV-2 interview will be conducted at: **Bangor High School (Wednesday October 29 at 9:00am).**
3. Refer to the Table of Exercise Demonstrations for specific times. This will be conducted out-of-sequence.

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 criterion will be demonstrated by the SEOC through the restriction of air, interstate, rail, and waterway access.

Allegan County

1. Decisions related to traffic and access control will be demonstrated in the Allegan County EOC.
2. Staffing of all other access and traffic control points will be simulated.
3. Demonstration will take place in the parking lot of Allegan County's EOC.

Berrien County

1. Decisions related to traffic and access control will be demonstrated in the Berrien County EOC.
2. Staffing of all other access and traffic control points will be simulated.
3. Demonstration will take place in the parking lot of Berrien County's EOC.

Van Buren County

1. Decisions related to traffic and access control will be demonstrated in the Van Buren County EOC.
2. Staffing of all other access and traffic control points will be simulated.
3. Demonstration will take place in the parking lot of the staging area.

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 does not apply

Allegan County

1. This will be demonstrated through discussions at the county EOC. Messages will be injected by Exercise Controllers to drive these demonstrations. Personnel will deal with the impediments 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. All contacts, actual or simulated will be logged. Information will be provided to the JIC for each impediment.

Berrien County

1. This will be demonstrated through discussions at the county EOC. Messages will be injected by Exercise Controllers to drive these demonstrations. Personnel will deal with the impediments 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. All contacts, actual or simulated will be logged. Information will be provided to the JIC for each impediment.

Van Buren County

1. This will be demonstrated through discussions at the county EOC. Messages will be injected by Exercise Controllers to drive these demonstrations. Personnel will deal with the impediments 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. All contacts, actual or simulated will be logged. Information will be provided to the JIC for each impediment.

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 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.

This criterion will not be demonstrated during this exercise.

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.

This criterion will not be demonstrated during this exercise.

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.

This criterion will not be demonstrated during this exercise.

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.

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.

This criterion will not be demonstrated during this exercise.

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

1. The State will provide information to the county for release in the Emergency Alert System messages.

Van Buren County

The Van Buren County Sheriff's Department is the primary activation point for the public warning sirens. Van Buren County also activates the Emergency Alert System. An interview with WSJM personnel will be conducted by FEMA following transmittal of EAS messages.

Allegan County & Berrien County

Allegan and Berrien Counties will provide, as needed, information to Van Buren County for inclusion in EAS messages.

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 Palisades EPZ does not contain any DHS/FEMA approved exception areas. This criterion will not be demonstrated during this exercise.

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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, Allegan County, Berrien County & Van Buren County

1. 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.
2. A public inquiry hotline will be operated by Entergy 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

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

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

1. State level emergency worker decontamination was demonstrated successfully at the FTC on April 29, 2014.
2. State personnel will provide assistance as requested during county Public Reception/Emergency Worker decontamination center demonstrations. State technical advisors will display appropriate occupational dosimetry; however, evaluation of State personnel will be limited to activities performed in support of the demonstrations.

Allegan County

1. Allegan County will demonstrate public reception/decontamination center out-of sequence: **Otsego High School (Wednesday October 29, 2014 at 6:00pm).**
2. Public reception centers will demonstrate 1/3 of the monitoring teams required to monitor 20% of the population allocated to that facility within a 12-hour period. One team will monitor six individuals.

Berrien County

1. Berrien County will demonstrate separate public reception/decontamination center out-of sequence: **Berrien Springs High School (Tuesday October 28, 2014 at 6:00pm).**
2. Public reception centers will demonstrate 1/3 of the monitoring teams required to monitor 20% of the population allocated to that facility within a 12-hour period. One team will monitor six individuals.

Van Buren County

This criterion will not be demonstrated during this exercise.

Note: The decontamination and washing of vehicles and individuals, if detailed in the county plans, will be simulated.

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

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

1. State personnel will provide assistance as requested per the procedures in the Nuclear Facilities Emergency Management Plan during county Public Reception/Emergency Worker decontamination center demonstrations.
2. State technical advisors will display appropriate occupational dosimetry; however, evaluation of State personnel will be limited to activities performed in support of the demonstrations.

Allegan County

This criterion will not be demonstrated during this exercise.

Berrien County

1. Berrien County will demonstrate the emergency worker/equipment decontamination center out of sequence with the exercise at **Coloma High School (Monday October 27, 2014 at 6:00pm).**

Van Buren County

This criterion will not be demonstrated during this exercise.

Note: The decontamination and washing of vehicles and individuals, if detailed in the county plans, will be simulated.

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

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.

Allegan County

1. Allegan County will demonstrate a congregate care center out of sequence with the exercise at **Otsego High School (Wednesday October 29, 2014 at 6:00pm)**. 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.

Berrien County

1. Berrien County will demonstrate a congregate care center out of sequence with the exercise at **Berrien Springs High School (Tuesday October 28, 2014 at 4:00pm)**. 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.

Van Buren County

This criterion will not be demonstrated during this exercise.

Note: The American Red Cross Shelter Manager will conduct a walking tour of the facility and describe the Center's operation in accordance with the plans and procedures. A representative sample of each work station/capability will be used to demonstrate the registration and processing of at least three evacuees requiring emergency housing. Full set-up of the facility (e.g. housing, food-service, etc.) will not be required, but equipment inventories and personnel rosters will be provided to demonstrate capacity and 24-hour capabilities."

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

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 MDEQ will provide assistance if needed.

Van Buren County

Note: This criterion will be demonstrated during a MS-1 Drill with South Haven Area Emergency Services and the South Haven Hospital on (**Wednesday October 29, 2014 at TBD**).

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

U.S. Department of Homeland Security
FEMA Region V
536 South Clark Street, 6th Floor
Chicago, IL 60605



FEMA

October 9, 2014

Ms. Tonya Nobach
REP Unit Manager
Emergency Management and Homeland Security Division
Michigan State Police
4000 Collins Road
Lansing, Michigan 48910

Dear Ms. Nobach:

A technical review of the Scenario for the October 28, 2014, Palisades Nuclear Power Plant - Partial Participation Exercise, has been completed by the Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) Region V. The Scenario is reviewed to ensure that it is adequate to support the demonstration of criteria selected by the off-site response organizations, as provided in the State and Counties final extent of play agreement submitted on September 29, 2014.

The DHS/FEMA has determined that the Scenario is adequate to support the demonstration of criteria provided in the extent of play for the counties of Van Buren and Berrien. The Scenario for Allegan County criterion may not be adequate to drive exercise related "play" demonstration, however these criterion may be demonstrated through use of out-of-sequence exercise injects or mini-scenarios. Therefore, the Scenario, with the noted exceptions for Allegan County, is approved.

If you have any questions, please contact me at (312) 408-5342 or Karl Rabenhorst at (312) 408-5516.

Sincerely,

A handwritten signature in blue ink that reads "Dwaine K. Warren".

Dwaine K. Warren, Interim Co-Chairman
Regional Assistance Committee

Scenario Synopsis

Palisades Hostile Action Based (HAB) Emergency Preparedness Biennial Exercise – October 28th, 2014

It is a weekday (Tuesday) and a plant holiday. The plant is operating at 100% power and has been for the past six months. Weather is stable. There are no Limiting Conditions for Operation (LCOs). Fire Pump P-9A is out of service for breaker preventive maintenance. A routine diesel fuel oil delivery is scheduled for dayshift.

Shortly after the Operations Crew assumes responsibility for the watch, the Control Room receives a call from the Security Shift Supervisor detailing a hostile action within the Protected Area – the driver of the diesel fuel delivery truck attacked the escorting Security Officer then drove his truck into the Transformer Yard where it exploded. The explosion injured a second Security Officer and created a fire in the Transformer Yard. There is a loss of the Safeguards Bus and Bus 1C failed to fast transfer to start up power. Bus 1C is subsequently powered by EDG 1-1. Security calls Van Buren County Central Dispatch to notify of a Hostile Action.

The crew enters AOP-44, "Response to an Attack on Palisades." Onsite plant personnel are advised to Take Cover and the reactor is manually tripped at which time Bus 1D is de-energized due to an over current condition. The Shift Manager declares a "Site Area Emergency" per HS4.1 (a hostile action inside the Protected Area) and initiates offsite notifications to Van Buren County, the State of Michigan and the NRC. ERO staff augmentation is initiated with staff reporting to their offsite facility, including the Alternative TSC and Alternative OSC.

The Security Shift Supervisor notifies the Control Room that a second diesel fuel delivery truck is on fire at the east end of the employee parking lot and is totally blocking ingress and egress. The Control Room and Security discuss the "Take Cover" condition and urgent need to respond to the two injured officers and the fire in the Transformer Yard.

Van Buren County establishes a security perimeter around the Palisades site and an Incident Command Post (ICP) at the Covert Township Hall.

The EOF, JIC, Alternative TSC and Alternative OSC are established. Palisades ICP Liaisons are dispatched to the ICP. Emergency Operation Centers (EOCs) are established by Van Buren County, Allegan County, Berrien County and the State of Michigan. A Staging Area for offsite resources is

established at Covert High School. A State of Michigan radiological monitoring Field Team Center (FTC) will be simulated.

Diesel Fire Pump, P-9B, fails due to bearing failure resulting in increased urgency for offsite assistance.

Palisades' Liaisons at the ICP join the Emergency Director Bridge Line establishing a direct connection between the plant ERO and offsite support at the ICP. The Emergency Director and the ICP brief on the hostile action, current conditions, hazards and challenges, resources available and plant needs – from which priorities are established. Immediate needs of the plant include the mitigation of two fires, clearing of a vehicle blocking site access, medical care for two injured officers, law enforcement protection during an unknown security state, troubleshooting equipment failures, and safe passage for response teams. Based on the established priorities, the ICP establishes missions, briefs response teams, provides PPE and dispatches teams from the Staging Area. Security assists with the rapid onsite access into the Protected Area by the response teams.

Eventually, the plant loses all offsite and onsite AC power to the 2400 Safeguard Buses and conditions indicate restoration will not be possible within four hours. A "General Emergency" is declared per either SG1.1 or HG4.1, with a Plant Status PAR of an evacuation of Areas 1 and 2. There is no radiological release. The State of Michigan is notified and issues a Protective Action Order (PAO), Van Buren County activates the Alert Notification System and issues an EAS message. The JIC prepares and issues a news release and holds a media briefing.

The exercise ends once all licensee and offsite exercise objectives have been evaluated.

Palisades Hostile Action Based Exercise (HAB) Scenario 10-28-2014

Event	SEOC Actions	Van Buren Actions	Berrien Actions	Allegan Actions	JIC Actions
<ul style="list-style-type: none"> Initial conditions provided to SCR. Conditions met for an Site Area Emergency 					
<ul style="list-style-type: none"> Site Area Emergency Declared due to a large diesel fuel truck just overpowered a security officer Local & State notifications made. OSC, TSC, and EOF activated. 15-minute notification update established. 	<ul style="list-style-type: none"> MSP Operations notified by plant. MSP Operations notifies MSP/EMHSD and MDEQ/DWRPS. SEOC activation begun. MSP Operations notifies Allegan Berrien and Van Buren Counties. Activation of JIC. SEOC notifies FEMA and Indiana. 	<ul style="list-style-type: none"> Sheriff Dispatch notified by plant and MSP LEIN. Dispatch notifies EM & Chairperson. EOC activation begun. 	<ul style="list-style-type: none"> Sheriff Dispatch notified by plant and MSP LEIN. Dispatch notifies EM & Chairperson. EOC activation begun. 	<ul style="list-style-type: none"> JIC activation begun. Utility personnel will not demonstrate A/N or facility setup. State JIC personnel pre-positioned. 	
<ul style="list-style-type: none"> Hotline established to SEOC. 	<ul style="list-style-type: none"> SEOC operational. Governor may declare State of Emergency/Disaster. Hotlines opened to plant and counties. Notifications to counties via SEOC. 	<ul style="list-style-type: none"> EOC activation underway. Hotline opened to SEOC. Staging area and ICP are activated. 	<ul style="list-style-type: none"> EOC activation underway. Hotline opened to SEOC 	<ul style="list-style-type: none"> Communications initiated with SEOC. 	
<ul style="list-style-type: none"> EOF operational. TSC & OSC operational. 		<ul style="list-style-type: none"> EOC operational R/D & CCCs placed on standby. Staging area (simulated) and ICP are operational. 	<ul style="list-style-type: none"> EOC operational R/D & CCCs placed on standby 	<ul style="list-style-type: none"> JIC operational. 	
<ul style="list-style-type: none"> General Emergency (GE) declared loss of all offsite and all onsite AC power. Protective action recommendation (PAR) made to State Director. 	<ul style="list-style-type: none"> Plant notifies SEOC within 15 minutes. Notifications to counties via SEOC. If not done previously, declare State of Emergency/ Disaster. Evaluates PAR. Decides on a Protective Action Order (PAO). Issues PAO to counties. Requests federal assistance via FEMA. Issues further PAOs as needed. 	<ul style="list-style-type: none"> Sounds sirens. Issues EAS message. Implements PAO. 	<ul style="list-style-type: none"> Implement PAO (if pertain Berrien County) 	<ul style="list-style-type: none"> Implement PAO (if pertain to Allegan County) 	<ul style="list-style-type: none"> Informed of GE and PAO by SEOC. Informs media.
<ul style="list-style-type: none"> Plant terminates exercise play with State. 	<ul style="list-style-type: none"> Exercise play terminated when all objectives demonstrated. May terminate independently. 	<ul style="list-style-type: none"> Exercise play terminated when all objectives demonstrated. May terminate independently. 	<ul style="list-style-type: none"> Exercise play terminated when all objectives demonstrated. May terminate independently 	<ul style="list-style-type: none"> Exercise play terminated when all objectives demonstrated. May terminate independently. 	

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