

Final After Action Report/ Improvement Plan

Exercise Date – September 15, 2020

Radiological Emergency Preparedness (REP) Program



FEMA

Perry Nuclear Power Plant

Published November 30, 2020

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EXECUTIVE SUMMARY

On September 15, 2020, the Department of Homeland Security, Federal Emergency Management Agency (DHS/FEMA) Region V evaluated a Radiological Emergency Preparedness Program, Partial Participation, Plume Exposure Pathway Exercise in the Emergency Planning Zone (EPZ) for the Perry Nuclear Power Plant (PNPP).

The PNPP plant is located 35 miles east of Cleveland, Ohio. The 10-mile Plume Exposure Pathway EPZ of the PNPP encompasses land areas of Lake, Ashtabula, and Geauga Counties and Lake Erie.

The purpose of the exercise was to assess the level of state and local preparedness in responding to an incident at the PNPP. This exercise was conducted in accordance with DHS/FEMA's policies and guidance concerning the exercise of State and Local radiological emergency response plans and procedures. The previous federally evaluated exercise for this site was conducted on September 18, 2018. The qualifying emergency preparedness exercise was conducted on November 28, 1984.

Officials and representatives from the State of Ohio and the risk counties of Lake, Ashtabula, and Geauga and the Licensee participated in this exercise. State and Local officials demonstrated knowledge of their emergency response plans and procedures and successfully implemented them. No Findings or Plan Issues were identified for State of Ohio, Lake, Ashtabula, and Geauga Counties as a result of the 2020 PNPP Exercise.

The DHS/FEMA wishes to acknowledge the efforts of the many individuals who participated in the exercise and made it a success. Approximately 231 individuals participated in the offsite portion of the exercise, including many PNPP owner/operator personnel and local volunteers.

The ongoing COVID-19 Pandemic and other disasters that occurred during 2020 presented the State of Ohio with substantial logistical and communications challenges for simultaneously developing and implementing a successful commercial nuclear power plant exercise plan in a combined virtual and physical environment. The exercise was evaluated virtually using Microsoft Teams collaboration software configured by the State of Ohio Emergency Management Agency (EMA) and Lake, Ashtabula, and Geauga County to establish multiple Channels, each with audio/visual, chat, and exercise-related document sharing features.

This exercise also involved extensive use of well-documented Actual Incident Credit, as well as the successful tethering and implementation of virtual technologies and logistics, to assess the state's capabilities for protecting public health and safety. These combined efforts significantly expand the REP Program's relevance and capabilities. Pursuant to the documented and ongoing COVID-19 Pandemic response, the State of Ohio requested and received Actual Incident Credit for public information elements of Evaluation Criterion 5.b.1.

Lake, Ashtabula and Geauga Counties requested and received substantial Actual Incident Credit for Evaluation Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, and 3.d.1, and Partial Incident Credit for Criteria 3.d.2 and 5.b.1.

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SECTION 1: Exercise Overview

The 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 Radiological Emergency Preparedness Plans (RERPs) and procedures developed by State and local governments;
- Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated December 7, 2015 (Federal Register, Vol. 82, No. 88, May 9, 2017); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Agriculture;
 - U.S. Department of Commerce;
 - U.S. Department of Energy;
 - U.S. Department of Health and Human Services;
 - U.S. Department of the Interior;
 - U.S. Department of Transportation;
 - U.S. Environmental Protection Agency;
 - U.S. Food and Drug Administration; and
 - U.S. Nuclear Regulatory Commission.

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

A REP Partial-Participation Plume Exposure Pathway Exercise was conducted on September 15, 2020, and evaluated by the DHS/FEMA to assess the capabilities of State and Local offsite emergency preparedness organizations in implementing their RERPs and procedures to protect the public's health and safety during a radiological emergency involving the Perry Nuclear Power Plant. The purpose of this exercise report is to present the exercise results and findings on the performance of the Offsite Response Organizations (ORO) during a simulated radiological emergency.

The Scenario and Extent-of-Play Agreements submitted by the State of Ohio on August 18, 2020, by Lake County on July 24, and by Ashtabula and Geauga Counties on August 14, 2020, were approved by the DHS/FEMA Region V RAC Chair on August 25, 2020.

The COVID-19 Pandemic related travel and social distancing restrictions made it necessary to adopt and adapt virtual technologies to conduct the exercise. A virtual exercise evaluation platform was developed by the State of Ohio in collaboration with DHS/FEMA Region V. The use of computer-based audio-visual collaboration software, email, and cellular telephone-facilitated voice, text, and FaceTime communications allowed DHS/FEMA evaluation teams to remotely observe demonstration activities at multiple locations and access exercise documentation in real time.

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

Actual Incident Credit for the State of Ohio was approved by DHS/FEMA Region V on July 22, 2020 for Evaluation Criterion 5.b.1. Actual Incident Credit was approved for Lake, Ashtabula, and Geauga Counties on August 25, 2020, for Evaluation Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, and 3.d.1, and Partial Actual Incident Credit was approved on August 25, 2020, for Evaluation Criteria 3.d.2 and 5.b.1.

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

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

- NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980; and
- FEMA P-1028 REP Program Manual, dated January 2016.

1.1 EXERCISE DETAILS

EXERCISE NAME

Perry Nuclear Power Plant Radiological Emergency Preparedness (REP), Partial Participation, Plume Exposure Pathway Exercise

TYPE OF EXERCISE

Plume Exposure Pathway

EXERCISE DATE

September 15, 2020

LOCATIONS

See Appendices C and E for a complete list of locations.

SPONSORS

Ohio Emergency Management Agency
2855 West Dublin-Granville Road
Columbus, Ohio 43235

Energy Harbor – Perry Nuclear Power Plant
10 Center Rd
Perry, Ohio 44081

PROGRAM

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

MISSION

Response

SCENARIO TYPE

Radiological Emergency

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1.3 PARTICIPATING ORGANIZATIONS

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

STATE ORGANIZATIONS

- Ohio Department of Health
- Ohio Department of Natural Resources
- Ohio Department of Public Safety
- Ohio Emergency Management Agency
- Ohio Environmental Protection Agency

RISK COUNTY ORGANIZATIONS

Lake County

- Lake County Board of Commissioners
- Lake County Emergency Management Agency
- Lake County General Health District
- Lake County School District
- Lake County Sheriff's Office
- Lake County Utilities Department
- Retired Senior Volunteer Program (RSVP)

Ashtabula County

- Ashtabula County Auditors
- Ashtabula County Board of Commissioners
- Ashtabula County Department of Transportation
- Ashtabula County Emergency Medical Services – Northwest District
- Ashtabula County Emergency Management Agency
- Ashtabula County Health Department
- Ashtabula County IT Department
- Ashtabula County Sheriff's Office
- Ashtabula County Victims of Crime
- Ashtabula City Schools
- Conneaut Fire Department
- Geneva Fire Department

Geauga County

- Geauga County Board of Commissioners
- Geauga County Department of Emergency Services
- Geauga County Engineers
- Geauga County Health Department
- Geauga County Schools
- Geauga County Sheriff's Office

Other Support Jurisdictions

- Ottawa County Emergency Management Agency

PRIVATE ORGANIZATIONS

Energy Harbor (PNPP Owner/Operator)
GRISE AV Support – Ashtabula County
Knowledge Center – Ashtabula County
Root Integration AV Support – Lake County

FEDERAL ORGANIZATIONS

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

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SECTION 2: Exercise Design Summary

2.1 EXERCISE PURPOSE AND DESIGN

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

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

Formal submission of the radiological emergency response plans for the Perry Nuclear Power Plant to FEMA Region V by the State of Ohio and Lake, Ashtabula, and Geauga Counties occurred on May 24, 1989. Formal approval of these RERPs was granted by FEMA on June 17, 1994, under 44 CFR 350.

2.2 FEMA CORE CAPABILITIES AND EXERCISE OBJECTIVES

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

Operational Coordination: Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of Core Capabilities. Mobilize all critical resources and establish command, control, and coordination structures within the affected community, in other coordinating bodies in surrounding communities, and across the Nation, and maintain as needed throughout the duration of an incident. Enhance and maintain command, control, and coordination structures consistent with the National Incident Management System (NIMS) to meet basic human needs, stabilize the incident, and transition to recovery.

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

Public Information and Warning: Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard and, as appropriate, the actions being taken and the assistance being made available. Inform all affected segments of society of critical lifesaving and life-sustaining information by all means necessary, including accessible tools, to expedite the delivery of emergency services and aid the public to take protective actions. Deliver credible and actionable messages to inform ongoing emergency services and the public about protective measures and other life-sustaining actions, and facilitate the transition to recovery.

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

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

Critical Transportation: Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas. Establish physical access through appropriate transportation corridors and deliver required resources to save lives and to meet the needs of disaster survivors. Ensure basic human needs are met, stabilize the incident, transition into recovery for an affected area, and restore basic services and community functionality. Clear debris from any route type (i.e., road, rail, airfield, port facility, waterway) to facilitate response operations.

Mass Care Services: Provide life-sustaining and human services to the affected population, to include hydration, feeding, sheltering, temporary housing, evacuee support, reunification, and distribution of emergency supplies. Move and deliver resources and capabilities to meet the needs of disaster survivors, including individuals with access and functional needs. Establish, staff, and equip emergency shelters and other temporary housing options (including accessible housing) for the affected population. Move

from congregate care to non-congregate care alternatives and provide relocation assistance or interim housing solutions for families unable to return to their pre-disaster homes.

Operational Communications: Ensure the capacity for timely communications in support of security, situational awareness, and operations, by any and all means available, among and between affected communities in the impact area and all response forces. Ensure the capacity to communicate with both the emergency response community and the affected populations and establish interoperable voice and data communications between Federal, tribal, state, and local first responders.

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

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

The objectives for this exercise were as follows:

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

Objective 2: Demonstrate the ability to make protective action decisions affecting state and county emergency workers and the public through exercise play and discussion of plans and procedures.

Objective 3: Demonstrate the ability to implement protective actions for state and county emergency workers and the public through exercise play and discussion of plans and procedures.

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

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

Objective 6: Demonstrate the ability to monitor, decontaminate, register, and shelter evacuees through exercise play and discussion of plans and procedures.

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

Objective 8: Demonstrate the capacity for timely communications in support of security, situational awareness, and operations in accordance with the plan, procedures, and Extent-of-Play Agreement, among and between affected communities in the impact area and all response forces.

Objective 9: Demonstrate the capacity to stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore and revitalize systems and services to support a viable, resilient community. Demonstrate the capacity to provide transportation (including infrastructure access and

accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.

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

SECTION 3: Analysis of Capabilities

3.1 SUMMARY RESULTS OF EXERCISE EVALUATION

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

An overall summary of demonstrated capabilities is presented in Section 3.1, Tables 3.1.1 through 3.1.5, of this report. Criteria-specific narrative summaries are presented in Section 3.2 of the report. The narratives summarize observations made pursuant to the REP Program Evaluation Criteria used to assess the organizations and locations that were selected by the State of Ohio and Lake, Ashtabula, and Geauga Counties. The organizations, locations, and evaluation criteria selected by the State of Ohio and Lake, Ashtabula, and Geauga Counties are described in Appendix E, Extent-of-Play Agreements, which were approved by DHS/FEMA on August 25, 2020.

The results of the assessment are summarized below by Core Capability, as demonstrated during the September 15, 2020, PNPP REP Partial-Participation Radiological Emergency Preparedness Exercise.

Operational Coordination: Key leadership personnel established and maintained a unified and coordinated operational structure which provided effective and responsive command, direction and control and coordination within and between the affected jurisdictions to meet basic human needs and stabilize the incident.

Critical stakeholders were appropriately integrated within the overall decision-making process, which enabled protective action recommendations to be evaluated in an appropriate and timely manner. This process included input from both relevant critical stakeholders and support personnel and took into account the safety and well-being of emergency workers and the general public and protecting property and infrastructure protective action decisions were made without undue delay.

Situational Assessment: Decision makers were provided with decision-relevant information regarding the nature and extent of the simulated radiological and other hazards, any cascading effects, and the status of the response. The Ohio Emergency Management Agency, Ohio Environmental Protection Agency, and the Ohio Department of Health demonstrated proficiency in the use of dose assessment software to calculate dose projections independent of the Perry Nuclear Power Plant's dose projections. The staff calculated hypothetical dose projections based on plant conditions, possible release scenarios, and Controller-injected field monitoring team data. Leadership was prepared to gather and deliver enhanced information to reinforce lifesaving and life-sustaining activities, if needed, and engage governmental and private sector resources within and outside of the affected area to meet basic human needs and stabilize the incident, as necessary.

Public Information and Warning: The jurisdictions as a whole demonstrated the ability to deliver coordinated, prompt, reliable and actionable information to the whole community through the use of

clear, consistent and accessible means. Accurate initial information and follow-up on instructions were made with the formulation of news releases being reviewed from the Joint Information System and briefings conducted at the PNPP Joint Public Information Center and at the Lake, Ashtabula, and Geauga County EMAs. Alert and notification of the public and media was completed in a timely manner by simulated means of sounding of sirens, Emergency Alert System messaging, warning in state parks, news releases and media briefings. The simulated release of information via the aforementioned public information modes were consistent with protective action decisions and contained applicable and specific instructions relative to those decisions.

Environmental Response/Health and Safety: Appropriate measures were taken to ensure the protection of the health and safety of the public and workers, as well as the environment in support of responder operations and the affected communities. The availability of guidance and resources to address hazardous radiological materials was integrated in support of responder operations and the affected communities. State Liaisons at the PNPP Emergency Operations Facility communicated well with the State Emergency Operations Center to ensure that state protective action recommendations and county protective action decisions and responses were coordinated properly. Leadership identified, assessed, and mitigated worker health and safety hazards and disseminated health and safety guidance and resources to responders in accordance with the scenario, plans and procedures, and the extent-of-play agreements.

On-Scene Security and Protection: State and local law enforcement agencies demonstrated the capability to ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for response personnel who could have been directed to engage in lifesaving and life-sustaining operations. The implementation of traffic and access control was appropriately assessed and coordinated in a timely manner. On-scene security at EOCs, schools, reception centers and other facilities met protection requirements and eliminated or mitigated the risk of damage to persons, property, and the environment.

Critical Transportation: Officials demonstrated the capability to provide infrastructure access and accessible transportation services for response priority objectives, including the evacuation of people and animals and the delivery of vital response personnel, equipment, and services into the affected areas. School officials effectively demonstrated the ability to implement protective actions for affected local schools.

Mass Care Services: Congregate care center staff demonstrated the ability to provide life-sustaining services to affected populations with a focus on family reunification, feeding and sheltering. The American Red Cross, which manages all shelter operations under the REP Program, demonstrated the ability to provide resources, services and accommodations consistent with planning guidelines. They also demonstrated knowledge of the process, and to determine whether evacuees had been monitored for contamination and determined to be acceptable before entering congregate care facilities.

Operational Communications: Evaluation Criterion 1.d.1, which is the key criterion for this capability, was evaluated for applicable organizations and functional entities. Each applicable organization and location demonstrated the capacity for timely communications in support of security, situational awareness, and operations by primary and backup means, the ability to communicate with both the emergency response community and the affected populations, and to establish interoperable communications between Federal, state, and local all response groups and locations and between affected communities in the impact area.

Infrastructure Systems: Evaluation Criterion 3.d.2, which is the key criterion for this capability, was assessed pursuant to the capability of Lake, Ashtabula, and Geauga Counties to address impediments to mass evacuation. Lake, Ashtabula, and Geauga Counties demonstrated the capability to address roadway impediments due to landslides and other events that impair/impede safe evacuation of the public.

Tables 3.1.1 through 3.1.5 present the results and findings of the evaluation of all jurisdictions and functional entities that participated in the September 15, 2020 Partial Participation Plume Exposure Pathway Exercise and out-of-sequence interviews and demonstrations.

Each jurisdiction and functional entity was evaluated based on their demonstration of Core Capabilities and their equivalent Radiological Emergency Preparedness Evaluation Criteria, as delineated in the Federal Emergency Management Agency Radiological Emergency Preparedness Program Manual dated January 2016. Exercise criteria are listed by number, and the demonstration status of those criteria are indicated by the use of the following terms:

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

Table 3.1.1 – Summary of Exercise Evaluation – State of Ohio

DATE: September 15, 2020 SITE: Perry Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	State RRA Lake County EOC
Emergency Operations Management		
Mobilization	1a1	NS
Facilities	1b1	NS
Direction and Control	1c1	M
Communications Equipment	1d1	NS
Equipment and Supplies to Support Operations	1e1	NS
Protective Action Decision-Making		
EW Exposure Control Decisions	2a1	NS
PARs	2b1	NS
PADs	2b2	NS
PADs for Disabled/Functional Needs	2c1	NS
Ingestion PADs	2d1	NS
RRR Decisions	2e1	NS
Protective Action Implementation		
EW Exposure Control Implementation	3a1	NS
KI Public/Institutionalized	3b1	NS
PAD Implementation Disabled/Functional Needs	3c1	NS
PAD Implementation Schools	3c2	NS
TACP Establishment	3d1	NS
Impediments	3d2	NS
Implement Ingestion PADs	3e1	NS
Ingestion Pathway Decisions	3e2	NS
Implementation of RRR Decisions	3f1	NS
Field Measurement and Analysis		
RESERVED	4a1	NA
Field Team Management	4a2	NS
Field Team Operations	4a3	NS
Field Team Sampling	4b1	NS
Laboratory Operations	4c1	NS
Emergency Notification and Public Info		
Initial Alert & Notification	5a1	NA
RESERVED	5a2	NA
Backup Alert & Notification	5a3	NA
Exception Area Alerting	5a4	NA
Subsequent Information & Instructions	5b1	NA
Support Operations and Facilities		
Reception Center Operations	6a1	NA
EW Monitoring & Decontamination	6b1	NA
Congregate Care	6c1	NA
Contaminated Injured Transport & Care	6d1	NA

**Table 3.1.2 – Summary of Exercise Evaluation – State of Ohio
Out-of-Sequence Activities**

DATE: September 29, 2020 SITE: Perry Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	Primary A&N – Lake Erie – ODNR DC Briefing	Primary A&N – Lake Erie – ODNR Interview
Emergency Operations Management			
Mobilization	1a1	NS	NS
Facilities	1b1	NS	NS
Direction and Control	1c1	NS	NS
Communications Equipment	1d1	NS	M
Equipment and Supplies to Support Operations	1e1	M	M
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	NS	NS
PARs	2b1	NS	NS
PADs	2b2	NS	NS
PADs for Disabled/Functional Needs	2c1	NS	NS
Ingestion PADs	2d1	NS	NS
RRR Decisions	2e1	NS	NS
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	M
KI Public/Institutionalized	3b1	NS	NS
PAD Implementation Disabled/Functional Needs	3c1	NS	NS
PAD Implementation Schools	3c2	NS	NS
TACP Establishment	3d1	NS	NS
Impediments	3d2	NS	NS
Implement Ingestion PADs	3e1	NS	NS
Ingestion Pathway Decisions	3e2	NS	NS
Implementation of RRR Decisions	3f1	NS	NS
Field Measurement and Analysis			
RESERVED	4a1	NA	NA
Field Team Management	4a2	NS	NS
Field Team Operations	4a3	NS	NS
Field Team Sampling	4b1	NS	NS
Laboratory Operations	4c1	NS	NS
Emergency Notification and Public Info			
Initial Alert & Notification	5a1	NS	M
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NA	NA
Exception Area Alerting	5a4	NA	NA
Subsequent Information & Instructions	5b1	NS	NS
Support Operations and Facilities			
Reception Center Operations	6a1	NA	NA
EW Monitoring & Decontamination	6b1	NA	NA
Congregate Care	6c1	NA	NA
Contaminated Injured Transport & Care	6d1	NA	NA

Table 3.1.3 – Summary of Exercise Evaluation – Lake County

DATE: September 15, 2020 SITE: Perry Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC - Operations Room	EOC – Executive Group
Emergency Operations Management			
Mobilization	1a1	C	C
Facilities	1b1	NS	NS
Direction and Control	1c1	C	C
Communications Equipment	1d1	C	C
Equipment and Supplies to Support Operations	1e1	C	C
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	M	NS
PARs	2b1	NA	NA
PADs	2b2	NS	M
PADs for Disabled/Functional Needs	2c1	NS	M
Ingestion PADs	2d1	NA	NA
RRR Decisions	2e1	NS	NS
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	NS
KI Public/Institutionalized	3b1	M	NS
PAD Implementation Disabled/Functional Needs	3c1	NS	NS
PAD Implementation Schools	3c2	M	NS
TACP Establishment	3d1	C	NS
Impediments	3d2	M	NS
Implement Ingestion PADs	3e1	NA	NA
Ingestion Pathway Decisions	3e2	NA	NA
Implementation of RRR Decisions	3f1	NS	NS
Field Measurement and Analysis			
RESERVED	4a1	NA	NA
Field Team Management	4a2	NS	NS
Field Team Operations	4a3	NS	NS
Field Team Sampling	4b1	NA	NA
Laboratory Operations	4c1	NA	NA
Emergency Notification and Public Info			
Initial Alert & Notification	5a1	NS	M
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NS	NS
Exception Area Alerting	5a4	NA	NA
Subsequent Information & Instructions	5b1	M	NS
Support Operations and Facilities			
Reception Center Operations	6a1	NS	NS
EW Monitoring & Decontamination	6b1	NS	NS
Congregate Care	6c1	NS	NS
Contaminated Injured Transport & Care	6d1	NS	NS

Table 3.1.4 – Summary of Exercise Evaluation – Ashtabula County

DATE: September 15, 2020 SITE: Perry Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC – Operation Room	EOC – Executive Room
Emergency Operations Management			
Mobilization	1a1	C	C
Facilities	1b1	NS	NS
Direction and Control	1c1	C	C
Communications Equipment	1d1	C	C
Equipment and Supplies to Support Operations	1e1	C	C
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	M	NS
PARs	2b1	NA	NA
PADs	2b2	NS	M
PADs for Disabled/Functional Needs	2c1	NS	M
Ingestion PADs	2d1	NA	NA
RRR Decisions	2e1	NS	NS
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	NS
KI Public/Institutionalized	3b1	M	NS
PAD Implementation Disabled/Functional Needs	3c1	NS	NS
PAD Implementation Schools	3c2	M	NS
TACP Establishment	3d1	C	NS
Impediments	3d2	M	NS
Implement Ingestion PADs	3e1	NA	NA
Ingestion Pathway Decisions	3e2	NA	NA
Implementation of RRR Decisions	3f1	NS	NS
Field Measurement and Analysis			
RESERVED	4a1	NA	NA
Field Team Management	4a2	NA	NA
Field Team Operations	4a3	NA	NA
Field Team Sampling	4b1	NA	NA
Laboratory Operations	4c1	NA	NA
Emergency Notification and Public Info			
Initial Alert & Notification	5a1	NS	M
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NS	NS
Exception Area Alerting	5a4	NA	NA
Subsequent Information & Instructions	5b1	M	NS
Support Operations and Facilities			
Reception Center Operations	6a1	NS	NS
EW Monitoring & Decontamination	6b1	NS	NS
Congregate Care	6c1	NS	NS
Contaminated Injured Transport & Care	6d1	NS	NS

Table 3.1.5 – Summary of Exercise Evaluation – Geauga County

DATE: September 18, 2018 SITE: Perry Nuclear Power Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC – Operations Room	EOC – Executive Room
Emergency Operations Management			
Mobilization	1a1	C	C
Facilities	1b1	NS	NS
Direction and Control	1c1	C	C
Communications Equipment	1d1	C	C
Equipment and Supplies to Support Operations	1e1	C	C
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	M	NS
PARs	2b1	NA	NA
PADs	2b2	NS	M
PADs for Disabled/Functional Needs	2c1	NS	M
Ingestion PADs	2d1	NA	NA
RRR Decisions	2e1	NS	NS
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	NS
KI Public/Institutionalized	3b1	M	NS
PAD Implementation Disabled/Functional Needs	3c1	NS	NS
PAD Implementation Schools	3c2	M	NS
TACP Establishment	3d1	C	NS
Impediments	3d2	M	NS
Implement Ingestion PADs	3e1	NA	NA
Ingestion Pathway Decisions	3e2	NA	NA
Implementation of RRR Decisions	3f1	NS	NS
Field Measurement and Analysis			
RESERVED	4a1	NA	NA
Field Team Management	4a2	NA	NA
Field Team Operations	4a3	NA	NA
Field Team Sampling	4b1	NA	NA
Laboratory Operations	4c1	NA	NA
Emergency Notification and Public Info			
Initial Alert & Notification	5a1	NS	M
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NS	NS
Exception Area Alerting	5a4	NA	NA
Subsequent Information & Instructions	5b1	M	NS
Support Operations and Facilities			
Reception Center Operations	6a1	NS	NS
EW Monitoring & Decontamination	6b1	NS	NS
Congregate Care	6c1	NS	NS
Contaminated Injured Transport & Care	6d1	NS	NS

3.2 JURISDICTIONAL SUMMARY OF EXERCISE EVALUATION RESULTS

The following sections present narrative summaries that describe observations made during the exercise pursuant to the Evaluation Criteria and Core Capabilities demonstrated at each jurisdiction's response locations. Narrative summaries are organized by Jurisdiction, Location, Assessed Core Capability, and the Evaluation Criterion discussed in the Appendix E Extent-of-Play Agreements. The results of the assessments are summarized in Tables 3.1.1, 3.1.2, 3.1.3, 3.1.4, and 3.1.5.

3.2.1 State of Ohio

3.2.1.1 State Liaisons – Lake County Emergency Operations Center

Criterion 1.c.1 – Core Capability: Operational Coordination
Core Capability: Operational Communications
Core Capability: Situational Assessment

3.2.1.2 Primary A&N – Lake Erie – DC Briefing – Dosimetry / KI Distribution – ODNR

Criterion 1.e.1 – Core Capability: Environmental Response / Health and Safety
Core Capability: Mass Care Services
Core Capability: Public & Private Services and Resources
Core Capability: Public Health and Medical Services

Criterion 3.a.1 – Core Capability: Operational Coordination
Core Capability: Environmental Response/Health and Safety

3.2.1.3 Primary A&N – Lake Erie – ODNR Interview

Criterion 1.d.1 – Core Capability: Operational Communications

Criterion 1.e.1 – Core Capability: Environmental Response/Health and Safety
Core Capability: Mass Care Services
Core Capability: Public & Private Services and Resources
Core Capability: Public Health and Medical Services

Criterion 3.a.1 – Core Capability: Operational Coordination
Core Capability: Environmental Response/Health and Safety

Criterion 5.a.1 – Core Capability: Operational Communications

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

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

3.2.2 Lake County

3.2.2.1 EOC

- Criterion 2.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Situational Assessment
- Criterion 3.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – Core Capability: Operational Coordination
 - Core Capability: Public Information and Warning
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Public and Private Services and Resources
- Criterion 3.c.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.d.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Critical Infrastructure Systems
- Criterion 5.b.1 – Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

3.2.2.2 EOC Executive Room

- Criterion 2.b.2 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Operational Communications
 - Core Capability: Situational Assessment
- Criterion 2.c.1 – Core Capability: Operational Coordination
- Criterion 5.a.1 – Core Capability: Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

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

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

3.2.3 Ashtabula County

3.2.3.1 EOC

- Criterion 2.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Situational Assessment
- Criterion 3.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – Core Capability: Operational Coordination
 - Core Capability: Public Information and Warning
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Public and Private Services and Resources
- Criterion 3.c.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.d.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Critical Infrastructure Systems
- Criterion 5.b.1 – Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

3.2.3.2 EOC – Executive Room

- Criterion 2.b.2 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Operational Communications
 - Core Capability: Situational Assessment
- Criterion 2.c.1 – Core Capability: Operational Coordination
- Criterion 5.a.1 – Core Capability: Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

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

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

3.2.4 Geauga County

3.2.4.1 EOC

- Criterion 2.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Situational Assessment
- Criterion 3.a.1 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – Core Capability: Operational Coordination
 - Core Capability: Public Information and Warning
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Public and Private Services and Resources
- Criterion 3.c.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Environmental Response/Health and Safety
- Criterion 3.d.2 – Core Capability: Operational Coordination
 - Core Capability: Critical Transportation
 - Core Capability: Critical Infrastructure Systems
- Criterion 5.b.1 – Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

3.2.4.2 EOC Executive Room

- Criterion 2.b.2 – Core Capability: Operational Coordination
 - Core Capability: Environmental Response/Health and Safety
 - Core Capability: Operational Communications
 - Core Capability: Situational Assessment
- Criterion 2.c.1 – Core Capability: Operational Coordination
- Criterion 5.a.1 – Core Capability: Core Capability: Public Information and Warning
 - Core Capability: Operational Coordination
 - Core Capability: Operation Communications

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

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

SECTION 4: Conclusion

The Department of Homeland Security/Federal Emergency Management Agency Region V Evaluation Team identified no Findings and no Plan Issues for the State of Ohio during the 2020 PNPP Exercise. No Findings or Plan Issues were identified for Lake, Ashtabula, and Geauga Counties as a result of the exercise. The ongoing COVID-19 Pandemic and other disasters that occurred during 2020 presented the State of Ohio with substantial logistical and communications challenges for simultaneously developing and implementing a successful commercial nuclear power plant exercise. The response to these challenges and the results of the exercise are discussed in Appendix A of this After Action Report/Improvement Plan.

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

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APPENDIX A: Improvement Plan

This appendix summarizes the results from the of the evaluation of all jurisdictions and functional entities that participated in September 15, 2020, Perry Nuclear Power Plant, Partial Participation, Plume Exposure Pathway Radiological Emergency Preparedness (REP) Exercise to test the offsite emergency response capabilities of State and local governments in the 10-mile Emergency Planning Zone surrounding the PNPP, recommended corrective actions, and a schedule of corrective actions for the identified primary responsible agency.

The Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) Region V Evaluation Team identified no Level 1 or Level 2 Findings and no Plan Issues for the State of Ohio during the 2020 PNPP exercise. No Findings or Plan Issues were identified for Lake, Ashtabula, and Geauga Counties as a result of the exercise.

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

Best Practices

The exercise was evaluated virtually using Microsoft Teams collaboration software configured by the State of Ohio Emergency Management Agency and Lake, Ashtabula, and Geauga County to establish multiple Channels, each with audio/visual, chat, and exercise-related document sharing features.

A virtual exercise evaluation platform was developed by the State of Ohio in collaboration with DHS/FEMA Region V. The use of computer-based audio-visual collaboration software, email, and cellular telephone-facilitated voice, text, and FaceTime communications allowed DHS/FEMA evaluation teams to remotely observe demonstration activities at multiple locations and access exercise documentation in real time.

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

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APPENDIX B: Exercise Timeline

Table 1. Exercise Timeline

Date and Site: September 15, 2020 – Perry Nuclear Power Plant

Emergency Classification Level Event or Action	Time Utility Declared	Time (EDT) that Notification Was Received or Action Was Taken								
		EOF	SEOC DA	SEOC EXEC	SEOC JIC	LAKE County RRA	LAKE County	ASHTA- BULA County	GEAUGA County	JIC PNPP
Unusual Event:	0748	NA	NA	NA	NA	0758	0758	0758	0758	0804
Alert:	0827	NA	0842	0845	0845	0840	0840	0840	0840	0845
Site Area Emergency:	0938	0950	0948	0953	0950	0950	0950	0950	0950	0950
General Emergency:	1129	1129	1137	1139	1140	1140	1140	1140	1140	1140
Release of Rad Material Started:	0938	0950	0948	0953	0952	0952	0952	0952	0952	0952
Release of Rad Material Terminated:	Ongoing	1327	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
Facility Declared Operational:		1050	0825	0851	0855	0910	0910	0904	0904	1024
Declaration of STATE Emergency:		1005	0959	0955	0955	-----	-----	-----	-----	1007
Declaration of LOCAL Emergency: LC		-----	-----	-----	-----	1000	1000	-----	-----	1007
Declaration of LOCAL Emergency: AC		-----	-----	-----	-----	-----	-----	1005	-----	1007
Declaration of LOCAL Emergency: GC		-----	-----	-----	-----	-----	-----	-----	1000	1007
Exercise Terminated		1327	1327	1325		1315	1315	1320	1315	1322
Early Precautionary Action Recommendations:										
1. Relocate School Children:		-----	1000	1000	1003	0956 Decision 1015 Completed	0956 Decision 1015 Completed	0953	0953	1003
2. Restrict Boating Traffic:		1005	0900	0900	-----	0900	0900	0921	0921	-----
3. Restrict Air and Rail Traffic: Air then Rail		0900	0847 [A] 0955 [R]	0847 [A] 0955 [R]	0847 [A] ----- [R]	0905	0905	0921	0921	-----
4. Close Parks:		1005	0900	0900	0900	0900	0900	0921	0921	-----
5. Livestock Advisory:		1005	1002	1002	1002	1008	1008	1022	1022	1011
General Information Message Only: [Briefly Describe] 10-mile EPZ monitor EAS (Decision Made)		-----	0957	0957	1000	1025	1025	1025	1025	1025

LEGEND: NA = ECL/Event/Action Not Applicable at Location

----- = Time Not Reported

NT = Notification Time

Table 1. Exercise Timeline

Date and Site: September 15, 2020 – Perry Nuclear Power Plant

Event or Action	Time (EDT) that Notification Was Received or Action Was Taken								
	EOF	SEOC DA	SEOC EXEC	SEOC JIC	LAKE County RRA	LAKE County	ASHTA- BULA County	GEAUGA County	JIC PNPP
1st Protective Action Recommendation: State PAR[s] to County [List]: Evac 1, 2, 3, 5, 6, Lake Erie + KI per Plans	-----	1143	1143	1143	1146	1146	1146	1146	1150
1st Protective Action Decision[s] –County PAD[s]: <input type="checkbox"/> No Action <input type="checkbox"/> Shelter-In-Place Sub-Areas [List]: <input checked="" type="checkbox"/> Evacuate Sub-Areas [List]: 1,2,3,5,6, Lake Erie	1156	1149	1149	1149	1149	1149	1149	1149	1150
1st Siren Activation:	1156	1159	1159	1159	1159 Activation Time	1159	1159	1159	1159
1st EAS Message: Message D	1156	1202	1202	1202	1202 Broadcast Time	1202	1202	1202	1202
KI Administration Recommendation:	1205	1143	1143		1146	1146	1146	1146	1146
Emergency Workers: <input checked="" type="checkbox"/> PAR/PAD Sub-Area[s]: 1, 2, 3, 5, 6, Lake Erie	1205	1143	1143	1143	1149	1149	1149	1149	1149
Institutionalized Persons: <input checked="" type="checkbox"/> PAR/PAD Sub-Area[s]: 1, 2, 3, 5, 6, Lake Erie	1205	1143	1143	1143	1149	1149	1149	1149	1149
General Public: <input checked="" type="checkbox"/> PAR/PAD Sub-Area[s]: 1, 2, 3, 5, 6, Lake Erie	1205	1143	1143	1143	1149	1149	1149	1149	1149

LEGEND: NA = ECL/Event/Action Not Applicable at Location

----- = Time Not Reported

NT = Notification Time

APPENDIX C: Exercise Evaluation Team

SITE: Perry Nuclear Power Plant

EXERCISE DATE: September 15, 2020

Exercise Management	Name	Agency/ Organization
Chair, Regional Assistance Committee	Sean O’Leary	DHS/FEMA
Exercise Director	Edward Golinski	DHS/FEMA
Assistant Exercise Director	Stephen Tulley	DHS/FEMA
Ohio Site Specialist	Brian Reinhart	DHS/FEMA
Assistant Ohio Site Specialist	Carl Bebrich	DHS/FEMA
Team Leader – State of Ohio	Carl Bebrich	DHS/FEMA
Team Leader – Lake County	Todd Gemskie	DHS/FEMA
Team Leader – Ashtabula County	David Persaud	DHS/FEMA
Team Leader – Geauga County	Curtis Williams	DHS/FEMA
Contractor Evaluator Support – Regional Coordinator	Marcy Campbell	ICFI
Contractor Scenario Technical Reviewer	Jill Leatherman	ICFI

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
State of Ohio		
Ohio – State EOC – Dose Assessment Room	Jill Leatherman	ICFI
Ohio – State Liaisons – Lake County EOC (RAA & ODH)	Marcy Campbell	ICFI

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
State of Ohio – Out-of-Sequence		
Ohio – Primary A&N Lake Erie – DC Briefing / Dosimetry Distribution – ODNr	Carl Bebrich	DHS/FEMA
Ohio – Primary A&N Lake Erie – Interview – ODNr	Brian Reinhart	DHS/FEMA

Lake County		
Lake County – EOC	Edward Diaz	DHS/FEMA
Lake County – EOC	Katherine Boyce	DHS/FEMA
Lake County – EOC – Executive Group	Todd Gemskie	DHS/FEMA
Lake County – EOC – PIO	Carl Bebrich	DHS/FEMA

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
Ashtabula County		
Ashtabula County – EOC	James King	DHS/FEMA
Ashtabula County – EOC – Executive Group	Davis Persaud	DHS/FEMA
Ashtabula County – EOC – PIO	Carl Bebrich	DHS/FEMA

Geauga County		
Geauga County – EOC	Brian Reinhart	DHS/FEMA
Geauga County – EOC – Executive Group	Curtis Williams	DHS/FEMA
Geauga County – EOC – PIO	Carl Bebrich	DHS/FEMA

APPENDIX D: Acronyms

ACRONYM	DESCRIPTION
AAR	After Action Report
CD V	Civil Defense Victoreen
CFR	Code of Federal Regulations
DC	Dosimetry Coordinator
DES	Department of Emergency Services
DHS	Department of Homeland Security
DRD	Direct Reading Dosimeter
EAS	Emergency Alert System
ECL	Emergency Classification Level
EDL	Executive Discussion Line
EDT	Eastern Daylight Time
EMA	Emergency Management Agency
EMD	Emergency Management Director
EOC	Emergency Operation Center
EOF	Emergency Operations Facility
EPD	Electronic Personal Dosimeter
EPZ	Emergency Planning Zone
ESF	Emergency Support Function
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
GE	General Emergency (Emergency Classification Level)
IP	Improvement Plan
JIC	Joint Information Center
JIS	Joint Information System
KI	Potassium Iodide
LCGHD	Lake County General Health District
MARCS	Multi-Agency Radio Communications System
MDT	Mobile Data Terminals
mg	milligram
MOC	Media Operations Center
mR	milliRoentgen
NR	News Release
NIMS	National Incident Management System
No.	Number
NOAA	National Oceanic and Atmospheric Administration
NOUE	Notification of Unusual Event
NRC	Nuclear Regulatory Commission
ODH	Ohio Department of Health
ODNR	Ohio Department of Natural Resources

ACRONYM	DESCRIPTION
ODOT	Ohio Department of Transportation
ODPS	Ohio Department of Public Safety
Ohio EMA	Ohio Emergency Management Agency
OEPA	Ohio Environmental Protection Agency
ORO	Offsite Response Organizations
OSHP	Ohio State Highway Patrol
OSLD	Optically Stimulated Luminescence Dosimeter
PA	Public Address [system]
PAD	Protective Action Decision
PAR	Protective Action Recommendation
PIO	Public Information Officer
PNPP	Perry Nuclear Power Plant
PPE	Personal Protective Equipment
PR	Press Release
PRD	Permanent Record Dosimeter
R	Roentgen
RAC	Regional Assistance Committee
RAD	Radiological
rem	radiation exposure man
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
RO	Radiological Officer
RRA	Resident Radiological Analyst
SAE	Site Area Emergency (Emergency Classification Level)
SAR	Search and Rescue
SD	Sheriff's Department
SIB	Special Information Bulletin
SIMCELL	Simulation Cell
SNB	Special News Bulletin
SOG	Suggested Operating Guideline / Standard Operating Guideline
SOP	Standard Operating Procedure
SR	State Route
TACP	Traffic and Access Control Point
TEDE	Total Effective Dose Equivalent
U.S.	United States
USCG	United States Coast Guard
VHF	Very High Frequency

APPENDIX E: Extent-of-Play Agreements

STATE OF OHIO AND ASHTABULA, GEAUGA, AND LAKE COUNTIES

PERRY NUCLEAR POWER PLANT RADIOLOGICAL EMERGENCY PREPAREDNESS PARTIAL PARTICIPATION PLUME EXPOSURE PATHWAY EXERCISE

SEPTEMBER 15, 2020

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2020 PERRY NUCLEAR POWER PLANT

RADIOLOGICAL EMERGENCY PREPAREDNESS

PLUME EXPOSURE PATHWAY EXERCISE

SEPTEMBER 15, 2020



State of Ohio Extent-of-Play Agreement

8/18/2020

2020 Perry Nuclear Power Plant Exercise

State of Ohio Extent-of-Play Agreement

Introduction

This document constitutes the State of Ohio's Extent-of-Play (EOP) for the 2020 Perry Nuclear Power Plant (PNPP) Radiological Emergency Preparedness Plume Pathway Exercise being conducted on Tuesday, September 15, 2020. The exercise will be a Partial Participation exercise for the State of Ohio. This Extent-of-Play was developed in consultation with FEMA and the January 2016 edition of the FEMA Radiological Emergency Preparedness (REP) Program Manual.

Acronyms

COVID	Coronavirus Disease
DBNPS	Davis-Besse Nuclear Power Station
DRD	Direct Reading Dosimeter
ECL	Emergency Classification Level
EMA	Emergency Management Agency
EOF	Emergency Operations Facility
EOP	Extent-of-Play
ESF	Emergency Support Function
EPZ	Emergency Planning Zone
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Team
JIC	Joint Information Center
KI	Potassium Iodide
MSEL	Master Scenario Events List
N/S	Not Selected
ODH	Ohio Department of Health
ODNR	Ohio Department of Natural Resources
OEPA	Ohio Environmental Protection Agency
ORO	Offsite Response Organization
OSHP	Ohio State Highway Patrol
PAD	Protective Action Decision
PAG	Protective Action Guide
PAR	Protective Action Recommendation
PIO	Public Information Officer
PNPP	Perry Nuclear Power Plant
PRD	Permanent Reading Dosimeter
REP	Radiological Emergency Preparedness
RRA	Resident Radiological Analyst
SEOC	State Emergency Operations Center

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General Information

Partial Participation

The year 2020 brought enormous change and challenge to the world, COVID-19. It severely stressed the supply chains (both edibles and non-edibles), unemployment drastically spiked, and many people will not see 2021.

The State Emergency Operations Center (SEOC) has been activated at various levels for COVID-19 since March 9, 2020. The Operations Floor, Executive Room, Dose Assessment Room, State Joint Information Center (JIC), and every available meeting space were occupied at one point in time. Per the 2020 State of Ohio REP Plan, the JIC was even expanded into the adjoining room.

While the Dose Assessment Room and JIC were returned to their normally inactive state at the end of May, the Operations Floor and Executive Room remained partially active with many Emergency Support Functions (ESFs) working remotely. With the current surge of infections in the state, this status could quickly change. With parts of the SEOC unavailable and the situation unstable, in addition to the State having demonstrated most of the criterion necessary during the 2019 Davis-Besse Nuclear Power Station (DBNPS) exercise, the state has chosen to virtually support Ashtabula, Geauga, and Lake Counties during the PNPP exercise.

Initially a full participation exercise was planned. However, COVID-19 put a travel freeze on all state government employees. It is unlikely that the freeze will be lifted in time for the PNPP exercise. Because of this and the SEOC activation, the State of Ohio will virtually provide support for a partial participation exercise.

In addition, COVID-19 put a travel freeze on federal employees. It is unlikely that this freeze will be lifted in time for the PNPP exercise.

**FEMA
Evaluation/
Observation**

Due to the current pandemic and the unsure status of state employees with COVID-19 duties, the state will not demonstrate many of the criteria that would normally be addressed during a partial participation exercise.

Most state exercise locations successfully demonstrated their respective criteria during the 2019 DBNPS exercise. The applicable criteria for the State of Ohio will be evaluated next during the 2021 DBNPS exercise. This includes state functions at the SEOC consisting of the Initial Notification Point, State JIC, Executive Room, Assessment Room, Dose Assessment Room, and Operations Floor, the Lake County EOC, Utility JIC, and the Utility Emergency Operations Facility (EOF).

With the exception of Ohio Department of Natural Resources (ODNR) Parks & Watercraft's Cleveland Station, no other state agency will demonstrate criteria during the 2020 PNPP Exercise.

The State of Ohio will not request evaluation of any other criteria for the remainder of 2020.

**Exercise Scope –
Evaluated**

Performed out-of-sequence, ODNR Parks & Watercraft's Cleveland Station will demonstrate the criteria related to clearing Lake Erie (1.d.1, 1.e.1, 3.a.1, and 5.a.1). ODNR will demonstrate its criteria tentatively scheduled for September 29, 2020 at 9:00 am.

**Virtual Play –
Evaluated**

The ODNR demonstration will be evaluated by FEMA through the use of MS Teams, or similar software.

**Exercise Scope –
Non-Evaluated**

The State of Ohio will partially participate in this exercise, providing sufficient support for Ashtabula, Geauga, and Lake Counties. In-sequence State of Ohio activities will be conducted on Tuesday, September 15, 2020, at the following locations:

- State Initial Notification Point (Ohio State Highway Patrol (OSHP) Dispatch at the SEOC – in person)
- SEOC
 - Executive Room (Ohio EMA/ODH/OEPA/ODPS - virtual)
 - Dose Assessment Room (ODH - virtual)
 - State JIC (Ohio EMA - virtual)
- PNPP JIC (Ohio EMA/ODH - virtual)
- PNPP Emergency Operations Facility (EOF) (Ohio EMA/ODH – in person)
- Lake County Emergency Operations Center (EOC) (Ohio EMA – in person)(ODH – virtual)

Virtual Play – Non-Evaluated	<p>The Executive and Dose Assessment Rooms, as well as the utility JIC, will utilize Microsoft Teams to facilitate virtual play. A few players will utilize rooms located in close proximity to each other to allow for face-to-face interaction if the server goes down, MS Teams is inadequate as a virtual platform, or other needs arise.</p> <p>The State of Ohio requests FEMA observe the virtual play and provide feedback. No evaluation will occur.</p>
Exercise Support/ Controllers	<p>With the virtual nature of most exercise play, limited actual play, and the State having successfully demonstrated many Evaluation Criteria during the current exercise cycle, there will be one State-employed Controller stationed at the SEOC and one stationed in the Dose Assessment channel on MS Teams.</p> <p>There will not be a State-employed Controller at the Utility EOF. If FEMA evaluators need to discuss any issues, the Ohio EMA Resident Radiological Analyst (RRA) will be available for discourse.</p> <p>There will not be a State-employed Controller at the Lake County EOC. If FEMA evaluators need to discuss any issues, the Ohio EMA RRA will be available for discourse.</p> <p>If Evaluators are uncomfortable speaking to RRA or wish to interact with a Controller who is not playing, the Ohio EMA Lead Controller will be located at the SEOC and available by phone.</p> <p>At the time of this revision, State employees continue to have travel restrictions. There will not be any State Players or Controllers physically located at the utility JIC.</p>
Master Scenario Events List	<p>The State of Ohio will develop and implement a Master Scenario Events List (MSEL) sufficient to drive actual and simulated State play and support Ashtabula, Geauga, and Lake Counties. A MSEL will be provided to FEMA for review at least 30 days prior to the exercise.</p>
Off-Site Timeline	<p>The State of Ohio will develop a timeline of expected off-site state response actions and provide the timeline to FEMA for review at least 30 days prior to the exercise.</p>

Redemonstration Criteria Criteria 3.a.1 is the only criteria being evaluated for this exercise that can be re-demonstrated immediately for credit, at the decision of the evaluator.

Re-demonstrations will be negotiated between the Lead Controller, Lead FEMA Evaluator, and the offsite response organization (ORO) and will be conducted only when the corrective action would not interfere with the flow of the exercise. Refresher training may be provided by ORO personnel and/or the Controller.

It is permissible to extend the evaluation time to accommodate the re-demonstration. Issues resolved as the results of a re-demonstration will be noted as Findings resolved through re-demonstration.

Other criteria may be re-demonstrated, as approved on a case-by-case basis by the DHS/FEMA Region V Radiological Assistance Committee Chairman, include the following. However, none of the applicable criteria will be evaluated during this exercise.

Participating Organizations Organizations participating in this exercise include:

- Ohio Department of Health (ODH)
- Ohio State Highway Patrol (OSHP)
- Ohio Emergency Management Agency (Ohio EMA)
- Ohio Environmental Protection Agency (OEPA)
- Ohio Department of Natural Resources (ODNR)

State Field Participation State personnel to staff field positions will be pre-positioned in the local area at the following locations:

- Lake County EOC (Ohio EMA RRA)
Note: As the exercise takes place during a typical workday, the Ohio EMA RRA will be in their office at the county EOC.
- PNPP EOF (Ohio EMA RRA and ODH Liaison)
- PNPP JIC (Ohio EMA Public Information Officer (PIO) and ODH Liaison)
Note: The Ohio EMA PIO and ODH Liaison will be located remotely, communicating with the utility JIC through MS Teams.

Evaluation Area 1 – Emergency Operations Management

Criterion 1.a.1 OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Location None Selected (N/S) – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes Much of the play at the SEOC will be performed virtually.

The OSHP Dispatch Hub at the SEOC will receive the initial notification over the PNPP Initial Notification Conference Line. Once activated, all subsequent notifications by phone/fax communications will be received in the SEOC Dose Assessment Room by the Formal Line Communicator.

All notifications typically performed by the Watch Office/Assessment Room will be simulated. This includes calls to the SEOC partner agencies, FEMA III/V, NRC I/III, Pennsylvania, and Ontario. The email to the 50-mile counties and the subsequent eNotify email will be sent at SAE. However, the email and eNotify will be simulated at General Emergency.

The players from the Ohio EMA Radiological Branch will be stationed at the SEOC. The players at the SEOC will participate virtually using MS Teams. The Formal Line Communicator will be stationed at the utility phone in the Dose Assessment Room.

The Ohio EMA RRA assigned to the Lake County EOC works at the EOC on a normal daily basis and will already have arrived prior to the start of the exercise. The ODH Liaison will participate virtually using MS Teams.

The Ohio EMA RRA and the ODH Liaison assigned to the PNPP EOF will be prepositioned in the area and arrive 10-20 minutes after the EOF is scheduled to open to simulate travel time.

The Ohio EMA PIO and ODH Liaison will not travel, but will communicate with the utility JIC using MS Teams.

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

Location N/S – No changes have been made to the facility since it was successfully evaluated during the 2017 DBNPS exercise.

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.

Location Lake County EOC, all other State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes The Ohio EMA RRA at the Lake County EOC is responsible for advising the Lake County Executive Room.

Criterion 1.d.1 At least two communication systems are available, at least one operates properly, and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Location ODNR Parks & Watercraft - Cleveland Station

Notes ODNR will show, using MS Teams or other virtual platform, the communications systems available in the event that one should become inoperable.

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

Location ODNR Parks & Watercraft - Cleveland Station

Notes ODNR will show, using MS Teams or other virtual platform, the monitoring instruments, dosimetry, KI, and other equipment/supplies necessary to support their emergency operations.

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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes The SEOC Dose Assessment will consider Protective Action Guidelines (PAGs) and Administrative Limits to develop Protective Action Recommendations (PARs), including the administration of KI, based on their technical evaluation of the available data. Recommendations will be briefed using MS Teams to the Executive Room who will notify the Ashtabula, Geauga, and Lake Counties' EOCs. The County will make a Protective Action Decision (PAD) and notify their emergency workers. The State will disseminate the applicable PARs out to State emergency workers.

Simulated field monitoring data, appropriate to the scenario, will be provided to the Field Monitoring Team (FMT) Coordinator via a Sim Cell Controller using Virtual Plumes software.

Criterion 2.b.1 Appropriate protective action recommendations (PARs) are based on available information on plant conditions, field monitoring data, and Licensee and ORO dose projections, as well as knowledge of onsite and offsite environmental conditions.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes Dose Assessment will evaluate utility information and complete independent dose projections and assessment, as appropriate, based on that information and field monitoring data. Dose Assessment will evaluate the data and brief the developed PARs to the Executive Group. PARs are approved by the SEOC Director who will then notify the Ashtabula, Geauga, and Lake County EOCs via conference line and/or fax.

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 ORO policy).

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes The Governor, or their designee, will demonstrate the ability to make appropriate PARs based on technical information provided by Dose Assessment. Recommendations concerning the use of KI for the general public, institutionalized individuals, and emergency workers are the responsibility of ODH. KI recommendations will be made in accordance with the ODH KI Directive and will accompany the PAR.

Coordination will take place through the Executive Room's communications with the Ashtabula, Geauga, and Lake County to ensure consideration of local needs. After the PAD is made by counties, the county EMA Directors will notify the State and inform the public of the protective actions.

Criterion 2.c.1 Protective action decisions are made, as appropriate, for groups of persons with disabilities and those with access/functional needs

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes The recommendation regarding KI will be issued by ODH in Dose Assessment and accompanies the PAR. The PAR is briefed to the Executive Room. Once it is approved by the SEOC Director, Ashtabula, Geauga, and Lake Counties will be notified. The County will determine their PAD, notify the State, and implement their decision.

A no/minimal release scenario would not necessarily require PARs/PADs. This criterion will be met as long as the decision-making process is demonstrated and the result is consistent with the exercise scenario and plans/procedures. If the scenario utilized for the exercise does not drive the decision-making process this criterion may be demonstrated by Evaluator interview.

Criterion 2.d.1 Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP exercise.

Criterion 2.e.1 Timely post-plume phase 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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP 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 plans/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers.

Location ODNR Parks & Watercraft - Cleveland Station

Notes Direct Reading Dosimeters (DRDs), Permanent Record Dosimeters (PRDs) and KI will be issued to State of Ohio workers who have assignments inside the 10-mile EPZ or could travel through a plume.

Ingestion of KI, if recommended, will be simulated.

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

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Notes ODH may recommend KI for the general public when developing the PAR at the General Emergency ECL.

If the scenario utilized for the exercise does not drive this process, this criterion may be demonstrated by Evaluator interview.

Criterion 3.c.1 Protective action decisions are implemented for persons with disabilities and access/functional needs other than schools within areas subject to protective actions.

Location N/A - This is a County function.

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

Location N/A - This is a County function.

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

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

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

Location N/A - This is a County function.

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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP 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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP exercise.

Criterion 3.f.1 Decisions regarding controlled re-entry of emergency workers and relocation and return of the public during the post-plume phase are coordinated with appropriate organizations and implemented.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP exercise.

Evaluation Area 4 – Field Measurement and Analysis

Criterion 4.a.1 [RESERVED]

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

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS 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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Criterion 4.b.1 Field teams (2 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.

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP exercise.

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

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2026 PNPP 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 off-site emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.**

1. Identification of the State or local government organization and the official with the authority for providing the alert signal and instructional message.
 2. Identification of the commercial nuclear power plant and a statement that an emergency situation exists at the plant.
 3. Reference to REP-specific emergency information (e.g., brochures and information in telephone books) for use by the general public during an emergency.
 4. A closing statement asking the affected and potentially affected population to stay tuned for additional information.
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Location ODNR Parks & Watercraft - Cleveland Station

Notes Using MS Teams, or similar platform, ODNR will do a walkthrough of procedures to demonstrate the activities they would follow to perform the primary notification of the public of a nuclear power plant emergency while boating on Lake Erie. In event of such an emergency, the US Coast Guard would take lead with ODNR assisting.

Criterion 5.a.2 [RESERVED]

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

Location N/A - This is a County function.

Criterion 5.a.4 Activities associated with FEMA-approved exception areas (where applicable) are completed within 45 minutes of the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

Location N/A – The State of Ohio has no FEMA-approved Exception Areas at this time.

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

Location N/S – All State exercise locations successfully demonstrated this criterion during the 2019 DBNPS exercise. It will be evaluated again during the 2021 DBNPS exercise.

Evaluation Area 6 – Support Operation/Facilities

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

Location N/A - This is a County function.

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.

Location N/A - This is a County function.

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.

Location N/A - This is a County function.

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.

Location N/A - This is a County function.

Evaluation Locations

State Emergency
Operations
Center
*(Includes: Initial
Warning Point,
Executive,
Assessment,
Dose
Assessment, and
State JIC Rooms)*

Address	2855 West Dublin-Granville Road Columbus, Ohio 43235
Contact	Chris Salz
Phone	(614) 799-3675
Cell Phone	(614) 398-8811

PNPP JIC

Address	Auburn Career Center 8140 Auburn Road Concord Township, Ohio 44077
Contact	Hali Jenkins (Energy Harbor)
Phone	440-358-8003 (JIC Manager, only operable during drills/exercises)
Cell Phone	419-443-5751

PNPP EOF

Address	7751 Auburn Road Concord Township, Ohio 44077
Contact	Bart Ray
Phone	(419) 734-6903
Cell Phone-	(614) 285-8669

Lake County EOC

Address	8505 Garfield Road Mentor, OH 44060
Contact	Ed Filppi
Phone	(440) 350-5499
Cell Phone-	(440) 622-4751

FMT Coordinator
Controller

Address	1296 Kinnear Road Columbus, Ohio
Contact	Rob Stone
Phone	(614) 799-6620
Cell Phone	(614) 980-9525

ODNR Parks &
Watercraft –
Cleveland Station

Address	1150 East 49 th Street Cleveland, Ohio
Contact	Ed Filppi
Phone	(216) 361-1212
Cell Phone-	(440) 622-4751

**PERRY NUCLEAR POWER PLANT
RADIOLOGICAL EMERGENCY RESPONSE
PARTIAL PARTICIPATION
PLUME EXPOSURE PATHWAY EXERCISE
2020**



**LAKE COUNTY, OHIO
EXTENT-OF-PLAY AGREEMENT
August 24, 2020**

LAKE COUNTY OHIO

Extent-of-Play Agreement For the Perry Nuclear Power Plant Evaluated Exercise

Week of September 14, 2020

FINAL – August 24, 2020

This Extent of Play Agreement for the September 2020 exercise is developed based upon the current government guidance related to the COVID-19 virus. Social distancing and limiting gatherings of people, as well as the availability of first responders were considered in determining the scope and organization of this exercise. Out-of-sequence activities are limited to only those that are required in order to meet the 8-year exercise cycle guidance of the FEMA REP Program Manual. EOC operations may require some virtual participation mixed with physical participation in order to limit the number of personnel gathered and maintain social distancing.

The EOC portion of the exercise will take place on September 15, 2020.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1 and 3.b.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1, and 5.b.1.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

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

Extent of Play

Lake County EOC Staff will mobilize upon notification from the Lake County Sheriff's Central Communications Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field activity participants None

Real World Demonstration Credit

LCEMA activated its EOC to a Level 3 (virtual) monitoring status and created an incident in WebEOC to track response activities following notification by Lake County's General Health District Commissioner Ron H. Graham, on 3/17/2020 of Lake County's first COVID-19 case.

**See attached Criterion 1.a.1 documentation*

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

Extent of Play

The EOC and JIC were both evaluated during the 2018 Exercise; no changes have been made.

N/S - *This criterion was last demonstrated in 2006 and thus does not make it required for Lake County in this cycle.

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Lake County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of- sequence field demonstrations.

Real World Demonstration Credit

On 3/24/2020, the Lake County Board of Commissioners declared a State of Emergency to activate the response and recovery aspects of any and all local and inter-jurisdictional disaster emergency plans applicable to Lake County. On 4/7/2020, the LCEMA created an Incident Organization Chart (form ICS 207) detailing key personnel with leadership roles relating to the COVID-19 response effort. Included is a calendar from the week of 5/11/2020 showing multiple conference calls and virtual discussions with leadership positions identified on the form ICS 207.

****See attached Criterion 1.c.1 documentation.***

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/pagers/cell phones) means of communications will be demonstrated by interview at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Real World Demonstration Credit

On 4/8/2020, LCEMA created a Communications List (form ICS 205A) to establish communications links with appropriate persons and locations involved in the county COVID-19 response. Primary and secondary numbers appear in the list.

** See attached Criterion 1.d.1 documentation.*

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

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up, there is a quantity stockpiled at the EOC that would be transported to the care centers and distributed by the local health department, as requested.

Real World Demonstration Credit

On 4/3/2020, the Lake County General Health District asked the Lake County GIS Department for assistance in mapping COVID-19 business complaints in the county in order to support emergency operations of the agency. GIS created a program, a screen-shot of which has been provided for reference, as a result of that request. Lake County EMA received and tracked distribution of COVID-19 PPE. Included is a report generated for the Lake County General Health District forwarded to the Ohio Department of Health.

** See attached Criterion 1.e.1 documentation*

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.

Extent of Play

Lake County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limits.

****This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.***

Criterion 2.b.1: Appropriate protective action recommendations (PARS) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

Extent of Play

N/A – Lake County relies on the State of Ohio.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make precautionary and/or protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Lake County EOC Executive Group will demonstrate this criterion in coordination with Geauga and Ashtabula counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at care centers.

*This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.

Criterion 2.c.1: Precautionary and/or protective action decisions are made, as appropriate, for groups or persons with disabilities and access/functional needs.

Extent of Play

The Lake County EOC Executive Group will demonstrate this criterion in coordination with Geauga and Ashtabula counties' Executive Groups. Typically, schools relocate at Site Area Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria.

Extent of Play

N/A – Lake County relies on the State of Ohio.

Criterion 2.e.1: Timely post-plume phase 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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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 plans/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers.

Extent of Play

The Lake County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by Radiological Officer during the EOC portion of the exercise.

Field activity participants: None Dosimetry briefing:

The Radiological Officer will provide a dosimetry briefing to an exercise participant during the EOC portion of the exercise.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

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

Extent of Play

The Ohio Department of Health (ODH) will make recommendations regarding the use of KI. Lake County's preparedness measures for KI include pre- distribution to emergency response agencies and to the general public, if they chose to pick it up at designated centers. At the time of the emergency, the agencies distribute the dosimetry and KI to the emergency workers. Demonstration of this criterion may be facilitated by discussion with the Lake County General Health District Coordinator at the EOC.

For field agency demonstrations, KI procedures will be demonstrated by interview with exercise participants or by controller inject, if necessary.

Dosimetry and KI have been pre-distributed to Offsite Response Organizations (OROs); the monitoring kits and dosimetry are exchanged annually by the State of Ohio. Supporting documentation is included in the Annual Letter of Certification.

Extent of Play

Interview the EOC Lake County General Health District (LCGHD) representative during the exercise regarding the distribution of KI for the public at the care center.

****This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.***

Criterion 3.c.1: Precautionary and/or protective action decisions are implemented for persons with disabilities and access/ functional needs other than schools within areas subject to protective actions.

Extent of Play

N/S-This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

This Criterion will be demonstrated according plans and procedures.

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

Extent of Play

The Lake County Sheriff's Office representative in the EOC will demonstrate Traffic and Access Control by interview at the Lake County EOC during the exercise.

Notification of rail, water and air traffic is a State function.

Real World Demonstration Credit

On 6/1/2020, a public protest occurred in the central square of Painesville City in response to the death of George Floyd while in police custody in Minneapolis, Minnesota on 5/25/2020. Incident planning for the event, which included the Lake County Sheriff's Office, involved the establishment of access control and re-routing of traffic around the affected area. Briefings were also conducted to ensure accurate instructions were provided to the officers involved in security for the event.

****See attached Criterion 3.d.1 documentation***

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

Extent of Play

Lake County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision to reroute traffic will be discussed and implemented by the appropriate EOC Staff.

Real World Demonstration Credit

On 6/1/2020, a public protest occurred in the central square of Painesville City in response to the death of George Floyd while in police custody in Minneapolis, Minnesota on 5/25/2020. The protest created an impediment to regular traffic flow through the square and required the re-routing of traffic around the affected area.

**See attached Criterion 3.d.2 documentation*

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.

Extent of Play

N/A – Lake County relies on the State of Ohio.

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.

Extent of Play

N/A – Lake County relies on the State of Ohio.

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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

Criterion 4.a.1: (RESERVED)

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

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/S - This Criterion will not be demonstrated.

Criterion 4.b.1: The field teams (2 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.

Extent of Play

N/A - Lake County relies on the State of Ohio

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

Extent of Play

N/A - Lake County relies on the State of Ohio

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Geauga and Lake counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The “send” button on the Lake County EAS encoder will be depressed and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could perform this function, if necessary.

Lake County will fax or email a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message. In delivering information about the EAS message just released, the counties’ PIOs may indicate that a corresponding Special News Bulletin (SNB) will be issued soon. Lake County will also fax or email a copy of the EAS message to Ashtabula and Geauga counties’ EOCs.

** This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020*

Criterion 5.a.2: (RESERVED)

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

Extent of Play

N/S-This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/A – There are no exception areas in the PNPP siren coverage area.

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

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail. Lake County will FAX or email the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the three counties via a virtual computer network and/or teleconferencing system and answer any questions pertaining to the messages.

This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Lake and Geauga counties will also coordinate release of other informational and instructional messages as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins, and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least two trends will be demonstrated.

** This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Real World Demonstration Credit for Public Inquiry

The Lake County General Health District created a virtual hotline and email account for use by the general public during the COVID-19 response. The associated ICS 204 form details operation of the hotline and instructs staff answering calls to assure that call-types are being tracked. Also attached is the first three pages of the seventy-nine page call taker script used by the personnel staffing Public Inquiry.

** See attached Criterion 5.b.1 documentation*

EVALUATION AREA 6 – SUPPORT OPERATIONS / 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 of emergency workers.

Extent of Play

N/S-This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/S-This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

N/S-This Criterion has been successfully demonstrated within the current exercise cycle

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

NS - This Criterion has been successfully demonstrated within the current exercise cycle. The MS-1 portion of the Evaluated Exercise was conducted on October 2, 2019.

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**PERRY NUCLEAR POWER PLANT
RADIOLOGICAL EMERGENCY RESPONSE
PARTIAL PARTICIPATION
PLUME EXPOSURE PATHWAY EXERCISE
2020**



**ASHTABULA COUNTY, OHIO
EXTENT-OF-PLAY AGREEMENT
FINAL 8/14/2020**

ASHTABULA COUNTY OHIO

Extent-of-Play Agreement For the Perry Nuclear Power Plant Evaluated Exercise

**Week of September 14, 2020
FINAL – 8/14/2020**

This Extent of Play Agreement for the September 2020 exercise is developed based upon the current government guidance related to the COVID-19 virus. Social distancing and limiting gatherings of people, as well as the availability of first responders were considered in determining the scope and organization of this exercise. Out-of-sequence activities are limited to only those that are required in order to meet the 8-year exercise cycle guidance of the FEMA REP Program Manual. EOC operations may require some virtual participation mixed with physical participation in order to limit the number of personnel gathered and maintain social distancing.

The EOC portion of the exercise will take place on September 15, 2020.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1 and 3.b.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Preparedness Coordinating Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 5.a.1, 5.b.1 and 3.a.2.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

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

Extent of Play

Ashtabula County EOC Staff will mobilize upon notification from the Ashtabula County Sheriff's Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field activity participants:

None

Real World Demonstration Credit

ACEMA activated its EOC to a partial activation via staff-monitoring and a notification to EOC members of a virtual status and created an incident in WebEOC to track response activities on 3/12/2020. This course of action was in line with the State of Ohio EMA activation and an initial conference call with Ashtabula County Health Department and Ashtabula County Commissioners. *See attached Criterion 1.a.1 documentation

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

Extent of Play

N/S

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Ashtabula County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of- sequence field demonstrations.

Real World Demonstration Credit

On 3/18/2020, the Ashtabula County Board of Commissioners declared a State of Emergency to activate the response and recovery aspects of

the Ashtabula County Emergency Operations Plan. On 3/19/2020, the ACEMA created an incident in its Incident Management System, Knowledge Center. The Incident Organization Chart (form ICS 207) detailing key personnel with leadership roles relating to the COVID-19 response effort.

Included is a calendar from the week of 5/11/2020 showing multiple conference calls and virtual discussions with leadership positions identified on the form ICS 207.

***See attached Criterion 1.c.1 documentation.**

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/cell phones) means of communications will be demonstrated at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Real World Demonstration Credit

The ACEMA is capable of communicating through multiple options with telephone communications as our primary and email as the secondary. An EOC Staff roster is maintained through SwiftReach, our 9-1-1 emergency notification system. A tertiary option is available through text messaging. SwiftReach is a web-based system that can be accessed from anywhere, including the use of a mobile app. SwiftReach Company also offers support services if activation is needed from outside the impacted area. ACEMA can establish communications with appropriate persons and locations involved in the county COVID-19 response via Outlook Contact Lists as well. Primary and secondary numbers appear in the list. ACEMA possesses web- conferencing accounts through GoToMeeting and Microsoft Teams to allow for virtual capabilities as well.

***See attached Criterion 1.d.1 documentation.**

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

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up, there is a quantity stockpiled at the Health District that would be transported to the care centers and distributed by the local health department, as requested.

Real World Demonstration Credit

On April 10, 2020, ACEMA coordinated a project with the support of the Ashtabula County Health Departments to track residential addresses of county residents who have tested positive through the county's computer- assisted dispatch (CAD) system as a method of alerting first responders of potential exposure risks when responding to emergency calls. When a Ashtabula Co. Health Dept. receives notification of positive residents from the Ohio Department of Health, the address, date of the positive test and a 20-day window date is forwarded to ACEMA. ACEMA works with the Ashtabula Co. Sheriff's Office to add an alert to the address in the CAD system. When a public safety agency is dispatched to a confirmed address, they will automatically receive an alert that states "PPE is recommended." The 9-1-1 dispatchers will also reinforce the alert by advising the responding agency's to "Check their CAD."

***See attached Criterion 1.e.1 documentation.**

****See separate 2020 PNPP County Instrument Inventories spreadsheet for instrument, OSLD and KI inventories for all three counties transmitted to FEMA on 7/29/2020.***

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.

Extent of Play

Ashtabula County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limits.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 2.b.1: Appropriate protective action recommendations (PARS) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio and licensee for PARS.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make precautionary and/or protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

Extent of Play

The Ashtabula County EOC Executive Group will demonstrate this criterion in coordination with Lake and Geauga counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health

department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at reception centers/care centers.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 2.c.1: Precautionary and/or protective action decisions are made, as appropriate, for groups or persons with disabilities and access/functional needs.

Extent of Play

The Ashtabula County EOC Executive Group will demonstrate this criterion in coordination with Lake and Geauga counties' Executive Groups. Typically, schools relocate at Site Area Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

Criterion 2.e.1: Timely post-plume phase 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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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 plans/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers.

Extent of Play

The Ashtabula County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by Radiological Officer during the EOC portion of the exercise.

Field activity participants: None

Dosimetry briefing:

The Radiological Officer will provide a dosimetry briefing to an exercise participant during the EOC portion of the exercise.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

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

Extent of Play

The Ohio Department of Health (ODH) will make recommendations regarding the use of KI. Ashtabula County's preparedness measures for KI include pre-distribution to emergency response agencies and the general public, if they chose to pick it up. At the time of the emergency, the agencies distribute the dosimetry and KI to the emergency workers.

If the ODH recommendation for use of KI excludes the portion of the EPZ that is in Ashtabula County, demonstration of this criterion will be facilitated by discussion with the Ashtabula

County Radiological Officer at the EOC. For field agency demonstrations, KI procedures will be demonstrated by interview with exercise participants or by controller inject, if necessary.

Dosimetry and KI have been pre-distributed to Offsite Response Organizations (OROs); the monitoring kits and dosimetry are exchanged annually by the State of Ohio. Supporting documentation is included in the Annual Letter of Certification.

Interview the EOC Ashtabula County Health Department representative at the EOC during the exercise regarding the distribution of KI for the public at the care center.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 3.c.1: Precautionary and/or protective action decisions are implemented for persons with disabilities and access/ functional needs other than schools within areas subject to protective actions.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

This Criterion will be demonstrated according plans and procedures.

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

Extent of Play

The Ashtabula County Sheriff's Office representative in the EOC will demonstrate Traffic and Access Control by interview at the Ashtabula County EOC during the exercise.

Notification of rail, water and air traffic is a State function.

Real World Demonstration Credit

On April 13 & 19, 2020, troopers from the Ashtabula County Post of the Ohio State Highway assisted with traffic control at a food distribution site in Ashtabula.

On June 6, 2020, a public protest occurred in Cornelius Park in Ashtabula City in response to the death of George Floyd while in police custody in Minneapolis, Minnesota on 5/25/2020. Incident planning for the event, which included the Ashtabula City Police Department, Ashtabula City Fire, Lake County Bomb Squad, mutual aid from other law enforcement agencies throughout the county, involved the establishment of access control and re-routing of traffic around the affected area. Briefings were also conducted to ensure accurate instructions were provided to the officers involved in security for the event.

***See attached Criterion 3.d.1 documentation.**

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

Extent of Play

Ashtabula County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision process to re-route traffic will be discussed and implemented by the appropriate EOC Staff. The process and discussions related to rerouting traffic will be demonstrated via audio/video of the activity.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Real World Partial Demonstration Credit

On April 13 & 19, 2020, troopers from the Ashtabula County Post of the Ohio State Highway assisted with traffic control at a food distribution site in Ashtabula.

On June 6, 2020, a public protest occurred in Cornelius Park in Ashtabula City in response to the death of George Floyd while in police custody in Minneapolis, Minnesota on 5/25/2020. Incident planning for the event, which included the Ashtabula City Police Department, Ashtabula City Fire, Lake County Bomb Squad, mutual aid from other law enforcement

agencies throughout the county, involved the establishment of access control and re-routing of traffic around the affected area. Briefings were also conducted to ensure accurate instructions were provided to the officers involved in security for the event.

***Note** documentation for Criterion 3.d.2 is identical to Criterion 3.d.1 documentation listed on pages 37 through 45 of this documentation.

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.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

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.

Extent of Play

N/A – Ashtabula County relies on the State of Ohio.

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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

Criterion 4.a.1: (RESERVED)

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

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

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.

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

Criterion 4.b.1: The field teams (2 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.

Extent of Play

N/A - Ashtabula County does not demonstrate this criterion.

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

Extent of Play

N/A – Ashtabula County does not demonstrate this criterion.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Lake and Geauga counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. A quiet siren test will be demonstrated by the Lake County EOC in lieu of an actual siren sounding.

No siren activation will be performed by Ashtabula County.

Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The “send” button on the Lake County EAS encoder will be depressed, and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could provide this function if necessary. Lake County will fax or email a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message.

In delivering information about the EAS message just released, the counties’ PIOs may indicate that a corresponding Special News Bulletin (SNB) will be issued soon. Lake County will also fax or email a copy of the EAS message to Ashtabula and Geauga counties’ EOC’s.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Criterion 5.a.2: (RESERVED)

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

Extent of Play

N/S – This criterion will not be demonstrated 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.

Extent of Play

N/A – There are no exception areas in the PNPP siren coverage area.

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

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail.

Lake County will FAX or email the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the three counties by directly proceeding to the briefing room and reading the contents of the message to the assembly of news media representatives and answering any questions pertaining to the message.

This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Geauga and Lake counties will also coordinate release of other informational and instructional message, as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins, and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least two trends will be demonstrated.

**This Criterion will be demonstrated during a PNPP Evaluated exercise on 9/15/2020.*

Real World Demonstration Credit for Public Inquiry

In a joint effort the Ashtabula County Health Department and 2-1-1 Ashtabula County created a virtual and telephonic hotline for use by the general public during the COVID-19 response. The press release details operation of the hotline. 2-1-1 Ashtabula County used the COVID-19 Call Center Script provided by the Ohio Department of Health (revised 3/13/20) to instruct staff answering calls to assure that call-types are being tracked and consistent messaging is provided. The ODH Call Center Script is 38 pages in length and is available upon request.

**See attached Criterion 5.b.1 documentation*

EVALUATION AREA 6 – SUPPORT OPERATIONS / 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.

Extent of Play

N/S – This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/S – This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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**PERRY NUCLEAR POWER PLANT
RADIOLOGICAL EMERGENCY RESPONSE
PARTIAL PARTICIPATION
PLUME EXPOSURE PATHWAY EXERCISE
2020**



**GEAUGA COUNTY, OHIO
EXTENT-OF-PLAY AGREEMENT
FINAL – 8/14/2020**

GEAUGA COUNTY OHIO

Extent-of-Play Agreement For the Perry Nuclear Power Plant Evaluated Exercise

**Week of September 14, 2020
FINAL – 8/14/2020**

This Extent of Play Agreement for the September 2020 exercise is developed based upon the current government guidance related to the COVID-19 virus. Social distancing and limiting gatherings of people, as well as the availability of first responders were considered in determining the scope and organization of this exercise. Out-of-sequence activities are limited to only those that are required in order to meet the 8-year exercise cycle guidance of the FEMA REP Program Manual. EOC operations may require some virtual participation mixed with physical participation in order to limit the number of personnel gathered and maintain social distancing.

The EOC portion of the exercise will take place on September 15, 2020.

Criteria that can be re-demonstrated immediately for credit, by a decision of the evaluator, include the following: 3.a.1 and 3.b.1

Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairman of the Radiological Preparedness Coordinating Committee, include the following: 2.a.1, 2.b.2, 5.a.1, 5.b.1, and 3.a.2

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

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

Extent of Play

Geauga County EOC Staff will mobilize upon notification from the Geauga County Sheriff's Dispatch Center, which is the 24-hour notification point and receives the call via a dedicated line from the Perry Plant. Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Field activity participants None

Demonstration of Real-World Credit – See Exhibit #1

- Screen Shot from the State of Ohio's WebEOC; Geauga County EMA notifying its State of Ohio's Regional EMA Representative that its EOC had virtually been activated on 20 March 2020 at 1337 hrs.
- Geauga County WENS Communication Test Results of the Perry Nuclear Power Plant's Event Notification List, 1 July 2020.

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

Extent of Play

N/A - This Criterion will not be demonstrated. This criterion was last demonstrated in 2006.

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.

Extent of Play

Direction and control of emergency operations will be demonstrated in accordance with the exercise scenario, the Geauga County Radiological Emergency Response Plan, Agency SOG and as appropriate for out-of- sequence field demonstrations.

Demonstration of Real-World Credit – See Exhibit #2

- Commissioners' Journal (excerpt) from 24 March 2020; Resolution for Declaration of State of Emergency Due to COVID-19
- Sample of Meeting Minutes, 25 March 2020, Geauga County Elected Officials' COVID-19 Conference Call
- Sample of Geauga Public Health's Newsletter *Straight from the Source*, 15 April 2020

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established with appropriate locations. Communications capabilities are managed in support of emergency operations.

Extent of Play

Primary (dedicated phone lines and commercial telephone) and secondary (radio/pagers/cell phones) means of communications will be demonstrated by interview at the EOC and as appropriate for out-of-sequence field demonstrations. Controllers will drive field play.

Full field notification utilizing primary means of communication will be completed one time only from the EOC, at the Site Area Emergency classification.

Demonstration of Real-World Credit – See Exhibit #3

- Refer to Exhibit #1 Geauga County's WENS Communication Test
- Refer to Exhibit #1, Footnote 1, Geauga County's Perry Nuclear Power Plant Notification List

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

Extent of Play

The EOC will demonstrate the use of equipment, maps and displays to support emergency operations.

In addition to the KI that the local health department made available to the general public to pick up, there is a quantity stockpiled at the Health District that would be transported to the care centers and distributed by the local health department, as requested.

Demonstration of Real-World Credit – See Exhibit #4

- Example of Mapping: Screen Shot Map of Geauga County's Special Needs Residences within the Emergency Planning Zone
- Listing of Geauga County's Special Needs Residences within the Emergency Planning Zone
- Equipment and KI Listing for Geauga County Emergency Workers

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.

Extent of Play

Geauga County relies on the Ohio Department of Health (ODH) for the recommendation to take KI. For out-of-sequence field agency demonstrations, this will be demonstrated by interview with exercise participants or by controller inject, if necessary.

The use of a Controller inject will begin the process of authorization for radiation exposures in excess of administrative limit.

Demonstration of Real-World Credit

This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

Criterion 2.b.1: Appropriate protective action recommendations (PARS) are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

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 ORO policy).

Extent of Play

The Geauga County EOC Executive Group will demonstrate this criterion in coordination with Lake and Ashtabula counties' Executive Groups and the State of Ohio.

The Director, or designee, of the Ohio Department of Health (ODH) makes the decision for the general public and emergency workers to take KI. The ODH through the local health department makes KI available to the general public, by pre-distribution and by supplies available for distribution at the time of the emergency at care centers.

Demonstration of Real-World Credit

This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

Criterion 2.c.1: Precautionary and/or protective action decisions are made, as appropriate, for groups or persons with disabilities and access/functional needs.

Extent of Play

The Geauga County EOC Executive Group will demonstrate this criterion in coordination with Lake and Ashtabula counties' Executive Groups. Typically, schools relocate at Site Area

Emergency per procedures. If not relocated prior to General Emergency, schools follow the protective action decisions for the general public; they are not considered a special population group.

Demonstration of Real-World Credit

This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

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.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

Criterion 2.e.1: Timely post-plume phase 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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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 plans/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. OROs maintain appropriate record-keeping of the administration of KI to emergency workers.

Extent of Play

The Geauga County EOC Radiological Officer will demonstrate radiation exposure control capabilities. Dosimetry and exposure control procedures will be demonstrated by the Radiological Officer during the EOC portion of the exercise.

Dosimetry Briefing

The Radiological Officer will provide a dosimetry briefing exercise participants.

Demonstration of Real-World Credit

This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

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

Extent of Play

Interview the Geauga County Health District representative at the EOC during the exercise regarding the distribution of KI for the public at the care center.

Demonstration of Real-World Credit

This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

Criterion 3.c.1: Precautionary and/or protective action decisions are implemented for persons with disabilities and access/ functional needs other than schools within areas subject to protective actions.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

This criterion will be demonstrated according to plans and procedures.

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

Extent of Play

The Geauga County Sheriff's Office representative in the EOC will demonstrate Traffic and Access Control by interview at the Geauga County EOC during the exercise.

Notification of rail, water and air traffic is a State function.

Demonstration of Real-World Credit – See Exhibit #5

- Fire Incident 21 June 2020, Wires Down, Road Closure
 - Auburn Twp. fire incident report
 - Sheriff's Office CAD dispatch report
 - Ohio Department of Transportation public e-mail
 - EMA Director's Press Release, dated 20 June 2020
- Geauga County Engineer's Notices of Road Closures

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

Extent of Play

Geauga County EOC will demonstrate the capability to identify and take the appropriate actions in dealing with impediments to evacuation. Actual resources will not be utilized. If an impediment cannot be removed in a timely manner, the decision to reroute traffic will be discussed and implemented by the appropriate EOC staff.

The process and discussions related to rerouting traffic will be demonstrated via audio/video of the activity.

Demonstration of Partial Real-World Credit – See Exhibit #5

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.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

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.

Extent of Play

N/A – Geauga County relies on the State of Ohio.

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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

EVALUATION AREA 4 – FIELD MEASUREMENT AND ANALYSIS

Criterion 4.a.1: (RESERVED)

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

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

Criterion 4.b.1: The field teams (2 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.

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

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

Extent of Play

N/A – Geauga County does not demonstrate this criterion.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

Extent of Play

Upon a protective action decision (PAD) by the combined Executive Groups of Ashtabula, Lake and Geauga counties, the Lake County EOC Staff will prepare the appropriate Emergency Alert System (EAS) message and simulate sounding the sirens and sending the message over the EAS system. A quiet siren test will be demonstrated by the Lake County EOC in lieu of an actual siren sounding.

No siren activation will be performed by Geauga County.

Simulation of sending the EAS message(s) will be conducted as follows:

The procedure for the EAS encoder will be followed to deliver the message to WTAM, the Local Primary Station, with the exception that the telephone number to the station will not be dialed. By not connecting to WTAM, there is no possibility of accidentally broadcasting the message over one or more of the participating EAS stations.

The “send” button on the Lake County EAS encoder will be depressed, and this action will activate the outgoing alert light and playback of the recorded message. Also, a data sheet will automatically be printed by the encoder and the time recorded on the data sheet. Ashtabula and Geauga counties have EAS equipment (encoder) and could perform this function, if necessary.

Lake County will fax or email a copy of the EAS message(s) to the Joint Information Center (JIC) where Public Information Officers (PIOs) may distribute hard copies to the news media representatives and may, if time and circumstances permit, make an announcement regarding the message. Otherwise, the EAS message can be announced at the next scheduled press briefing or in response to news media inquiries about the PAD message. In delivering information about the EAS message just released, the counties' PIOs may indicate that a corresponding Special News Bulletin (SNB) will be

issued soon. Lake County will also fax or email a copy of the EAS message to Ashtabula and Geauga counties' EOCs.

Demonstration of Real-World Credit

- This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.

Criterion 5.a.2: (RESERVED)

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

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/A – There are no exception areas in the PNPP siren coverage area.

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

Extent of Play

Based upon the combined PAD(s) of the Executive Groups of Ashtabula, Geauga and Lake counties, the Lake County EOC Staff will prepare and issue the appropriate EAS message(s) and

the corresponding Special News Bulletin(s) (SNB). SNB's give the same message as their corresponding EAS message except SNB's provide greater detail. Lake County will fax or email the SNB(s) to the Joint Information Center (JIC) where one of the counties' PIOs will represent the three counties by directly proceeding to the briefing room and reading the contents of the message to the assembly of news media representatives and answering any questions pertaining to the message. This briefing should begin in a timely manner after transmission of the EAS message from the Lake County EOC to the Local Primary EAS Station. Hard copies of the SNB(s) will be distributed to the news media representatives.

Ashtabula, Geauga and Lake counties will also coordinate release of other informational and instructional message as necessary. Such messages may include Special Information Bulletins (SIB), which are a third category of prepared messages contained in the counties' "SOG for EAS Messages, Special News Bulletins, and Special Information Bulletins pertaining to the Perry Nuclear Power Plant." These SIB's are considered routine, meaning that they are to be delivered by one of the counties' PIOs at the next scheduled press briefing.

Public Inquiry Workers at the EOC will answer calls from the public. At least two trends will be demonstrated.

Demonstration of Real-World Credit

- This criterion will be demonstrated on 15 September 2020 during the PNPP Integrated Exercise.
- Refer Exhibit #2: Sample of Geauga Public Health's Newsletter *Straight from the Source*, Volume 1, Issue 7, 15 April 2020
- See Exhibit #6: Excerpt from Ohio Department of Health's COVI- 19 Call Center Script which Geauga Public Health used to answer public inquiries.

EVALUATION AREA 6 – SUPPORT OPERATIONS / 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 of emergency workers.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

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

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

Extent of Play

N/S - This Criterion has been successfully demonstrated within the current exercise cycle.

APPENDIX F: Onsite/Offsite Scenario Timeline

Initial Environmental Conditions:

- Tuesday dayshift,
- Overcast.
- Wind Speed is 8 mph
- Wind Direction is from 333 degrees
- Stability Class is 'D'.
- Schools are in session

Plant Conditions:

- Plant power 100%
- PSA Risk **GREEN**
- Power ascension has been completed following a weekend down power
- Provide today's integrated on call report

Communications

All non-face to face communications shall be preceded with "This is a Drill". Make no phone calls to personnel outside the Extent of Play before talking to the facility lead controller. Example, the simulator Control room shall not call the real SCC for power restoration.

Equipment Issues: 1C11-C001B, CRD Pump B Out of Service for bearing replacement

Executive Summary:

This drill will be conducted using an operations crew in the Perry Control Room Simulator which will provide "live" simulator data to drill participants, exact event times provided in this timeline may vary based on crew response or controller direction. Initial conditions are; Tuesday dayshift, clear and cool. Wind is 8 mph from 333 degrees, stability class 'D'. Schools are in session.

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

Approximate Time	Message/Problem Statement	State Expected Actions	County & Local Agencies Response
7:30 AM	StartEx		
7:59 AM	PNPP declares an UNUSUAL EVENT based on a seismic event greater than Operating Basis Earthquake (OBE) as indicated by the Control Room seismic instrumentation (HU2.1).		
8:14 AM	Offsite response agencies notified of UNUSUAL EVENT declaration 7:59 AM.		
		Dispatch notifies the Radiological Branch.	Counties' Dispatch receives notification.
		The Radiological Branch has a conference call with the Watch Office and the Executives.	Counties' Dispatch notifies EMA Directors who specifies the level of notification.
		Watch Office makes assigned notifications.	Counties' Dispatch makes notification as directed.
8:20 AM	First significant aftershock occurs causing a Turbine Generator trip.		
8:22 AM	Scram occurs with a number of rods failing to insert. Additional actions from Reactor Control Console are not successful.		
8:26 AM	Fuel damage occurs. Drywell, Containment, Main Steam Line, and Off-gas Pretreatment radiation monitors begin to trend upward.		
8:37 AM	PNPP declares an ALERT based on manual scram not shutting down the reactor with subsequent actions not successful in shutting down the reactor as indicated by reactor power $\geq 4\%$ (SA6.1).		
	PNPP may instead declare an ALERT based on a hazardous event affecting a safety system needed for the current operating mode (SA8.1) if the crew determines that the degraded performance of safety systems was likely to have been caused by seismic events.		

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

8:42 AM	Radiation monitors continue to increase.		
	At this time, the threshold for any loss or any potential loss of either fuel clad or RCS barrier (FA1.1).		
8:52 AM	Offsite response agencies notified of ALERT declaration at 8:37 AM.		
		Dispatch notifies the Radiological Branch, if the Formal Line Communicator has not already been staffed.	Counties' Dispatch calls/notifies EMA Directors.
		The Radiological Branch has a conference call with the Watch Office and the Executives.	EMA Directors advise Dispatch to make notification to OROs necessary based on the ALERT & EAL.
		Watch Office makes assigned notifications.	Per procedures, select EOC Staff report to their respective EOCs and commence assigned duties.
		Executive Room (ER), Assessment, Dose Assessment and JIC are activated.	Lake County will place a call to the Common Program Control Station and place them on stand-by.
		Dose Assessment takes over phones from Dispatch, if not performed already.	Two Lake County FMTs are assembled at the Lake County EOC and, when ready, may be dispatched to field locations.
		PIO may be deployed to the Utility JIC. Management will determine the level of physical and virtual activation/mobilization.	EMA Communicators assume control of the 5-WAY phone.

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

		Dose Assessment begins to monitor plant conditions and run dose projections.	If the JIC is activated, the counties may send their PIOs to commence public information duties there.
		ER considers activating the SEOC.	
		FMTs are put on stand-by or dispatched to staging area.	
		The 10-mile EPZ air space is restricted.	
		Rail notified of Alert.	
		News release is provided to public from Ohio EMA.	
		Public Inquiry begins to field calls at the SEOC.	
9:22 AM	A second aftershock hits. A steam rupture occurs in the RCIC Pump Room. RCIC steam supply isolation valves fail open. The Aux Building and Unit #1 Plant Vent monitors begin to rise.		
9:37 AM	PNPP declares a SITE AREA EMERGENCY based on the loss of RCS (>40 Rem/hr Drywell dose rate) and Containment due to unisolable direct downstream pathway to the environment (FS1.1).		
9:52 AM	Offsite response agencies notified of SITE AREA EMERGENCY declaration at 9:37 AM.		
		If not already completed, State EOC is activated. Additional OROs, contiguous governments, and 50-mile counties are notified by Watch Office/Assessment.	Counties receive notification of the SAE over the 5-WAY phone.

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

		Additional OROs, contiguous governments, and 50-mile counties are notified by Watch Office/Assessment.	EOC Staff not yet in the EOC are notified and asked to report for duty.
		Governor considers and declares a state of emergency.	The counties' EOC Executive Groups ensure that a "State of Emergency" is declared.
		Ag advisory issued placing livestock and poultry within 10-mile radius on stored feed and protected water.	Ashtabula, Geauga, and Lake counties each demonstrate actual notifications to their respective response agencies. NOTE: This is the only full notification demonstrated in the counties.
		ER discusses clearing Lake Erie and closing State parklands. Assessment contacts USCG Sector Buffalo to broadcast message to mariners. ODNR Watercraft is dispatched to assist.	Field response agencies assemble personnel and equipment (simulated).
		Dose Assessment continues to monitor plant conditions and run dose projections.	TCPs are planned & coordinated in EOCs.
		PAR issued by State to monitor EAS.	Lake County FMTs, if not already in field locations, are dispatched.
		FMTs begin traversing area where a plume could potentially be based on met data.	Monitoring/decontamination teams, once assembled and ready, may move to assigned locations.
		News releases provided to public from State JIC.	EOCs will make the decision to relocate risk school population, if schools in session.

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

		Rail traffic restricted from entering 10-mile EPZ.	Public Inquiry hotlines in the EOCs begin receiving calls.
		USDOE assistance is requested.	Care Center/Reception Center/Emergency Worker mon/decon personnel report to assigned monitoring/decon facilities.
		50-mile IPZ counties are notified.	
		Radiological emergency information made available to farmers, food processors, and distributors through the local OSU Extension.	
11:18 AM	Drywell radiation monitor exceeds 400 Rem/hr.		
11:33 AM	PNPP declares a GENERAL EMERGENCY based on the loss of two barriers and loss or potential loss of the third (FG1.1).		
	PNPP issues PAR to evacuate subareas 1, 2, 3, 5, 6, and the Lake; KI is to be administered to the general public in accordance with State procedures; general public in unaffected areas should be advised to go indoors and monitor EAS broadcasts.		
11:48 AM	Offsite response agencies notified of GENERAL EMERGENCY declaration at 11:33 AM.		
		SEOC representatives are advised of the escalation to a General Emergency.	Counties' Executive Groups are notified of the GE and of the utility's protective action recommendations. The counties' Executive Groups deliberation over the EDL.

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

		Additional notifications to be performed by Assessment. Contiguous governments and 50-mile counties are kept advised.	Counties simulation notifications to all field agencies.
		Dose Assessment continues to monitor plant conditions and run dose projections.	A Protective Action Decision (PAD) is coordinated with the three counties & State via the EDL.
		PAR issued by State to evacuate 2-mile 360, 10-mile downwind. Remainder of EPZ stay tuned to EAS.	Lake County assembles an EAS message, simulates sounding the sirens, and delivers the message to the Common Control Program Station, who simulates broadcast over the air.
		State issues PAR for public, institutionalized, and emergency workers within the evacuated areas to ingest KI.	Lake County transmits a copy of the EAS message to the JIC, State EOC, EOF, and the other two counties.
		Rail traffic restricted from exiting 10-mile EPZ.	Monitoring/decon faculties are activated, if not already activated.
		FMTs begin taking air samples in the plume. Samples are screened and sent to the lab.	
		State may request implementation of the NRF and a Presidential Emergency Declaration. State may consider requesting a Federal Major Disaster Declaration, dependent upon contamination and extent of event.	

Perry Nuclear Power Station 2020 Evaluated Exercise – On-Site / Offsite Timeline

		News releases provided to public from State JIC. Public inquiry continues to field calls at the SEOC.	
		ER considers extending the ag advisory to 50-miles.	
		Radiological emergency information made available to farmers, food processors, and distributors through the local OSU Extension.	
2:00 PM	Crew is successful in replacing the control power transformer and fuses. The release is terminated.		
2:00 PM	EndEx		

