



FEMA

Aug 14, 2023

Kristi Rollwagen
Director, Division of Homeland Security and Emergency Management
445 Minnesota Street Suite 223
Saint Paul, Minnesota 55101

Dear Director Rollwagen,

Enclosed is one copy of the Final After-Action Report/Improvement Plan (AAR/IP), for the Prairie Island Nuclear Generating Plant Radiological Emergency Preparedness, out-of-sequence Plume Exposure Pathway, Congregate Care Center, and Reception Center Drill evaluation.

The exercise resulted in no Level 1 Findings, no Level 2 Findings, and no Plan Issues for the State of Minnesota.

Based on the results of the exercise, the planning and preparedness for both the State of Minnesota and the affected local jurisdiction continue to provide reasonable assurance that appropriate measures can be taken to protect the public health and safety. Therefore, Title 44 CFR 350 approval of the offsite radiological emergency response plans and preparedness program remain in effect.

If you have any questions, please contact Sean O'Leary, Chair, Regional Assistance Committee, at (312) 408-5389.

Sincerely,

**MICHAEL S
CHESNEY**

Digitally signed by
MICHAEL S CHESNEY
Date: 2023.08.14
15:02:57 -05'00'

for Thomas C. Sivak
Regional Administrator

Cc:

DHS/FEMA Headquarters
NRC Region III
NRC Headquarters Document Control Desk

Attachment (1):

Final PINGP OOS 2023 AAR.pdf



Nuclear Power Plant Exercise

Prairie Island Nuclear Generating Plant

Radiological Emergency Preparedness Program

Cottage Grove Congregate Care Center/

Reception Center

Final After-Action Report/Improvement Plan

Exercise Date: June 28, 2023

Report Date: July 28, 2023



FEMA

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Executive Summary

On June 28, 2023, the U.S. Department of Homeland Security, Federal Emergency Management Agency (DHS/FEMA) Region 5 Radiological Emergency Preparedness Program staff evaluated an out of sequence Plume Exposure Pathway, Congregate Care and Reception Center Drill in the Emergency Planning Zones (EPZ) for the Prairie Island Nuclear Generating Plant (PINGP).

The PINGP plant is located 40 miles southwest of the Twin Cities in Minnesota. The 10-mile Plume Exposure Pathway EPZ of the PINGP encompasses part of Goodhue County, Dakota County, and part of Pierce County, Wisconsin.

The purpose of the drills was to assess the level of state and local preparedness in responding to an incident at the PINGP. 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 August 2, 2022. The qualifying emergency preparedness exercise was conducted on December 8, 1981.

Officials and representatives from the State of Minnesota and the Licensee Xcel Energy 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 the State of Minnesota as a result of the 2023 PINGP out-of-sequence Plume Exposure, Congregate Care and Reception Center Drill.

The Federal Emergency Management Agency wishes to acknowledge the efforts of the many individuals who participated in the exercise and made it a success. Over 65 positions were staffed during the out-of-sequence exercise activities, and many positions were filled by local volunteers. The professionalism and teamwork of the participants was evident throughout all phases of the exercise.

Section 1: Exercise Overview

Exercise Name	2023 Radiological Emergency Preparedness Congregate Care/Reception Center Evaluation	
Type of Exercise	Congregate Care/Reception Center Evaluation	
Exercise Date	June 28, 2023	
Out of Sequence Date(s)	N/A	
Program	Radiological Emergency Preparedness Program	
FINAL Scenario Submittal to FEMA	May 10, 2023	
FINAL Extent-of-Play Agreement Submittal to FEMA	May 10, 2023	
Mission Area	Response, Preparedness, Protection	
Core Capabilities	Environmental Response/Health & Safety	Operational Coordination
	Planning	Mass Care Services
Participating Organizations	See Appendix A for the list of Participating Organizations	
Evaluated Facilities	See Appendix B Section 4 for the Extent-of-Play Agreement	
Exercise Planning Team	Minnesota Homeland Security Emergency Management Xcel Energy	
FEMA Exercise Evaluation Leadership Team	Sean O'Leary, RAC Chair Edward Golinski, Exercise Director Edward Diaz, Site Specialist	

Section 2: Exercise Design Summary

2.1 Exercise Purpose

The DHS/FEMA administers the Radiological Emergency Preparedness Program pursuant to the regulations found in Title 44 C.F.R. § 350, 351, 352, 353, and 354. 44 C.F.R. § 350 codifies 16 planning standards that form the basis for radiological emergency response planning for the licensee, state, local, tribal, and territorial governments impacted by the emergency planning zones established for each nuclear power plant site in the United States. United States Nuclear Regulatory Commission regulations also codify the 16 planning standards for the licensee. 44 C.F.R. § 350, 351, 352, 353, and 354 sets forth the mechanisms for the formal review and approval of state, local, tribal, and territorial government radiological emergency response plans and procedures by FEMA. One of the Radiological Emergency Preparedness Program cornerstones established by these regulations is the biennial exercise of offsite response capabilities. During these exercises, affected state, local, tribal, and territorial governments demonstrate the capability to implement their plans and procedures to protect the health and safety of the public in the event of a radiological incident at a nuclear plant.

The results of this exercise, together with reviews of the radiological emergency response plans and verification of the periodic requirements set forth in NUREG-0654/FEMA-REP-1, the annual letter of certification, and staff assistance visits, enabled FEMA to provide a statement with the transmission of this final after-action report to the United States Nuclear Regulatory Commission. This statement verifies that the affected state, local, tribal, and territorial 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 incident; and (2) capable of being implemented. Using the Homeland Security Exercise and Evaluation Program methodology, core capabilities-based planning allows for exercise planning teams to develop exercise objectives and observe exercise outcomes through a framework of specific action items.

2.2 Exercise Core Capabilities

Furthermore, in an effort to strengthen response against catastrophic incidents, FEMA is aligning the REP Program with the National Preparedness System to ensure that not only preparedness is addressed, but also the five mission areas: prevention, protection, recovery, response, and mitigation. Additionally, the exercise objectives and capability targets assessed meet Radiological Emergency Preparedness Program Manual requirements and objectives. The core capabilities scheduled for demonstration during this exercise were:

- **Access Control/Identity Verification:** Apply a broad range of physical, technological, and cyber measures to control admittance to critical locations and systems, limiting access to authorized individuals to carry out legitimate activities.
- **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.
- **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.
- **Health and Social Services:** Restore and improve health and social services networks to promote the resilience, independence, health (including behavioral health), and well-being of the whole community.

- **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.
- **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.
- **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.
- **Operational Communication:** 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.
- **Planning:** Conduct a systematic process engaging the whole community as appropriate in the development of executable strategic, operational, and/or community-based approaches to meet defined objectives.
- **Public Health, Healthcare, and Emergency Medical Services:** Provide lifesaving medical treatment via emergency medical services and related operations and avoid additional disease and injury by providing targeted public health and medical support and products to all people in need within the affected area.
- **Situational Awareness:** 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.

These core capabilities, when successfully demonstrated, meet the exercise objectives. The objectives for this exercise were as follows:

- **Objective 1:** Emergency Operations Management
- **Objective 2:** Exposure Control
- **Objective 3:** Exposure Control
- **Objective 5:** Operate

Section 3: Analysis of Capabilities

3.1 Exercise Evaluation and Results

This section contains the results and findings of the evaluation of all jurisdictions and functional entities that participated in the June 28, 2023, Cottage Grove Congregate Care and Reception Center Drill.

Each jurisdiction and functional entity were evaluated based on the demonstration of objectives, core capabilities, and capability targets as delineated in the FEMA Radiological Emergency Preparedness Program Manual dated December 2019. Capability targets are listed by number and the demonstration status of those capability targets are indicated by the use of the following terms:

- **Met (M):** The jurisdiction or functional entity performed all activities under the objective/capability target to the level required per the work plan and/or the extent-of-play agreement, with no level 1 or level 2 findings evaluated under that objective/capability target during the current activity and no unresolved prior level 2 finding(s).
- **Level 1 Finding (L1):** An observed or identified inadequacy of organizational performance during an assessment activity that could cause a determination that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.
- **Level 2 Finding (L2):** An observed or identified inadequacy of organizational performance during an assessment activity that is not considered, by itself, to adversely impact public health and safety.
- **Plan Issue (P):** An observed or identified inadequacy in the offsite response organization's emergency plan/implementing procedures, rather than in that of the offsite response organization's performance.
- **Not Applicable (NA):** The objective/capability target does not apply to the jurisdiction.
- **Not Selected (NS):** For a justifiable reason, the jurisdiction or functional entity did not perform assessment activities under the objective/capability target as specified in the extent-of-play agreement.

Table 3.1.1 Summary of Exercise Evaluation - State of Minnesota Out-of-Sequence Activity

SITE: Prairie Island Nuclear Generating Plant DATE: June 28, 2023 M: Met L1: Level 1 Finding L2: Level 2 Finding P: Plan Issue NA: Not Applicable NS: Not Selected	Cottage Grove Congregate Care Center	Reception Center - Registration	Mon/Decon DC Rad Briefing	Mon/Decon - Evacuee Reception Center Manager Command & Control	Mon/Decon - Evacuee	Mon/Decon - Evacuee Vehicles
Objective 1: Emergency Operations Management Capability Targets						
1.1: Mobilization	NA	NA	NA	NA	NA	NA
1.2: Direction and Control	NA	NA	NA	M	NA	NA
1.3: Protective Action Recommendations	NA	NA	NA	NA	NA	NA
1.4: Protective Action Decisions Plume Phase	NA	NA	NA	NA	NA	NA
1.5: Protective Action Decision Implementation Plume Phase	NA	NA	NA	NA	NA	NA
1.6: Protective Action Decisions Post-Plume Phase	NA	NA	NA	NA	NA	NA
1.7: Protective Action Decision Implementation for the Post-Plume Phase	NA	NA	NA	NA	NA	NA
Objective 2: Exposure Control Capability Targets						
2.1: Emergency Worker Exposure Control Decision-Making Process	NA	NA	NA	NA	NA	NA
2.2: Emergency Worker Exposure Control Management	NA	NA	M	NA	M	M
Objective 3: Alert and Notification Capability Targets						
3.1: Communications	NA	NA	M	NA	NA	NA
3.2: Alert and Notification of the Public	NA	NA	NA	NA	NA	NA
3.3: Emergency Information and Instructions Public and News Media	NA	NA	NA	NA	NA	NA
Objective 4: Detect, Measure, Sample, Analyze, and Assess Capability Targets						
4.1: Field Monitoring Teams Management	NA	NA	NA	NA	NA	NA
4.2: Plume Phase Measurements and Sampling	NA	NA	NA	NA	NA	NA
4.3: Post-Plume Phase Measurements and Sampling	NA	NA	NA	NA	NA	NA
4.4: Laboratory Operations	NA	NA	NA	NA	NA	NA
4.5: Plume Phase Analysis and Dose Assessment	NA	NA	NA	NA	NA	NA
4.6: Post-Plume Phase Sampling Plan Development and Analysis	NA	NA	NA	NA	NA	NA
Objective 5: Operate Capability Targets						
5.1: Monitoring, Decontamination, Sheltering, and Registration of Evacuees	M	M	NA	NA	M	M
5.2: Monitoring & Decontamination of Emergency Workers, Equipment, & Vehicles	NA	NA	NA	NA	NA	NA
5.3: Transportation and Treatment of Contaminated, Injured Individuals	NA	NA	NA	NA	NA	NA
5.4: Traffic and Access Control	NA	NA	NA	NA	NA	NA

3.2 Detailed Results of Exercise Evaluation

The Homeland Security Exercise and Evaluation Program methodology is an analytical process used to assess the demonstration of specific capabilities during an exercise. A capability provides a means to perform one or more capability targets under specified conditions and to specific performance standards. Core capabilities form the foundation of the FEMA Region 5 Radiological Emergency Preparedness Program evaluations. Each jurisdiction's standalone capability summaries are provided below.

3.2.1 State of Minnesota

3.2.1.1 Cottage Grove - Congregate Care Center

Capability Target: 5.1: Monitoring, Decontamination, Sheltering, and Registration of Evacuees

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Mass Care; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

3.2.1.2 Cottage Grove – Reception Center – Registration

Capability Target: 5.1: Monitoring, Decontamination, Sheltering, and Registration of Evacuees

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Mass Care; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

3.2.1.3 Cottage Grove – Monitoring/Decontamination – Dosimetry Control Radiological Briefing

Capability Target: 2.2: Emergency Worker Exposure Control Management

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

Capability Target: 3.1: Communication

Core Capabilities: Operational Communications; Operational Coordination; Situational Awareness; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

3.2.1.4 Cottage Grove – Monitoring/Decontamination – Reception Center Manager – Command and Control

Capability Target: 1.2: Direction and Control

Core Capabilities: Operational Coordination; Mass Care Services

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

3.2.1.5 Cottage Grove – Monitoring/Decontamination – Evacuee

Capability Target: 2.2: Emergency Worker Exposure Control Management

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

Capability Target: 5.1: Monitoring, Decontamination, Sheltering, and Registration of Evacuees

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Mass Care; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

3.2.1.6 Cottage Grove – Monitoring/Decontamination – Evacuee Vehicle

Capability Target: 2.2: Emergency Worker Exposure Control Management

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

Capability Target: 5.1: Monitoring, Decontamination, Sheltering, and Registration of Evacuees

Core Capabilities: Operational Coordination; Environmental Response/Health and Safety; Mass Care; Planning

All activities described in the capability target were carried out in accordance with the plan, procedures, and extent-of-play agreement.

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In summary, the status of DHS/FEMA criteria for the Cottage Grove Congregate Care and Reception Center 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 DHS/FEMA assesses offsite response organization preparedness on an ongoing basis which meets the intent of Title 44 C.F.R. § 350, 351, 352, 353, and 354 planning standards and, through the assessment of selected core capabilities, the National Preparedness Goal.

The analysis of capabilities in Section 3 described the State of Minnesota and Prairie Island Nuclear Generating Plant offsite response capabilities. Overall, the drill was a success. The demonstration-based assessment activities evaluated by core capabilities, objectives, and capability targets were successfully demonstrated. All offsite response organizations demonstrated knowledge of their emergency response plans and procedures, and successfully demonstrated the ability to protect the health and safety of the public in the event of an incident involving the Prairie Island Nuclear Generating Plant.

There were no Findings or Plan Issues identified for the State of Minnesota.

Based on the results of the Congregate Care Center/Reception Center, the planning and preparedness for the State of Minnesota and affected local jurisdictions provide reasonable assurance that appropriate measures can be taken to protect public health and safety. Therefore, Title 44 C.F.R. § 350, 351, 352, 353, and 354, approval of the offsite radiological emergency response plans and preparedness for the State of Minnesota, remains in effect.

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

Appendix A: Participating Organizations

Federal Organizations

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

State of Minnesota

Homeland Security Emergency Management

Private Organizations

Amateur Radio Emergency Service

American Red Cross

Cottage Grove Fire Department

Cottage Grove Police Department

Washington County Sheriff's Office

Washington County Public Health

Xcel Energy

Appendix B: Evaluation Team

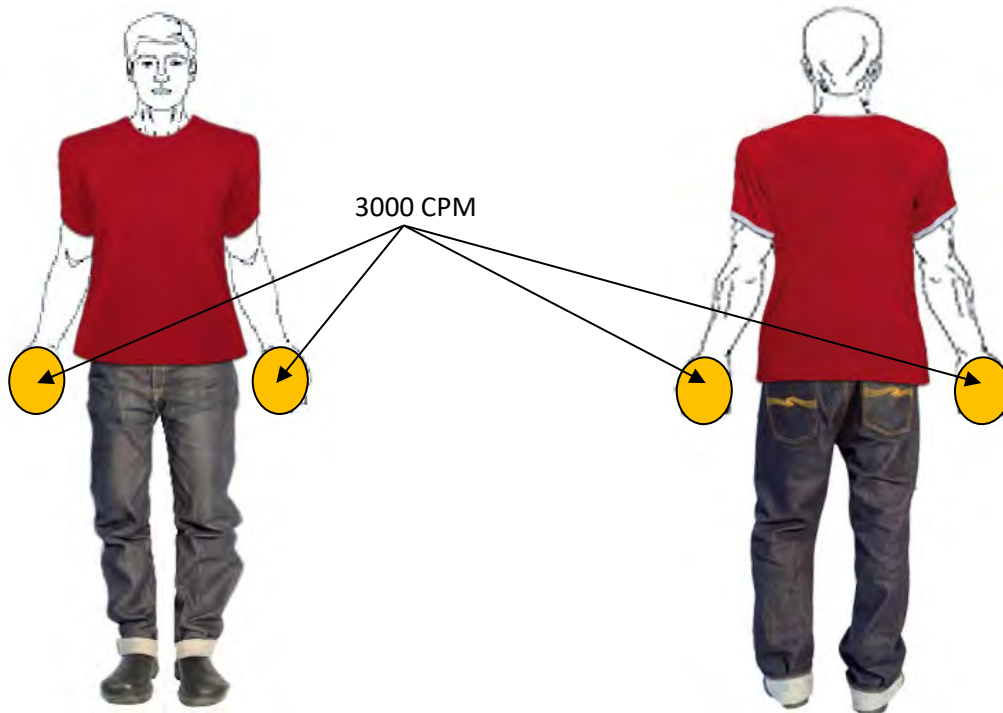
Exercise Management	Name	Agency/ Organization
Chair, Regional Assistance Committee	Sean O’Leary	DHS/FEMA
Exercise Director	Edward Golinski	DHS/FEMA
Minnesota Site Specialist	Edward Diaz	DHS/FEMA
Evaluator – Congregate Care Center/Reception Center Registration	Thomas Essig	ICFI
Evaluator – Mon/Decon Radiological Briefing	Herb Massie	ICFI
Evaluator – Mon/Decon Evacuee	Kevin Reed	ICFI
Evaluator – Mon/Decon Evacuee Vehicle	Rosemary Samsel	ICFI

Section 4: Demonstration Locations, Dates, Times, and Contacts

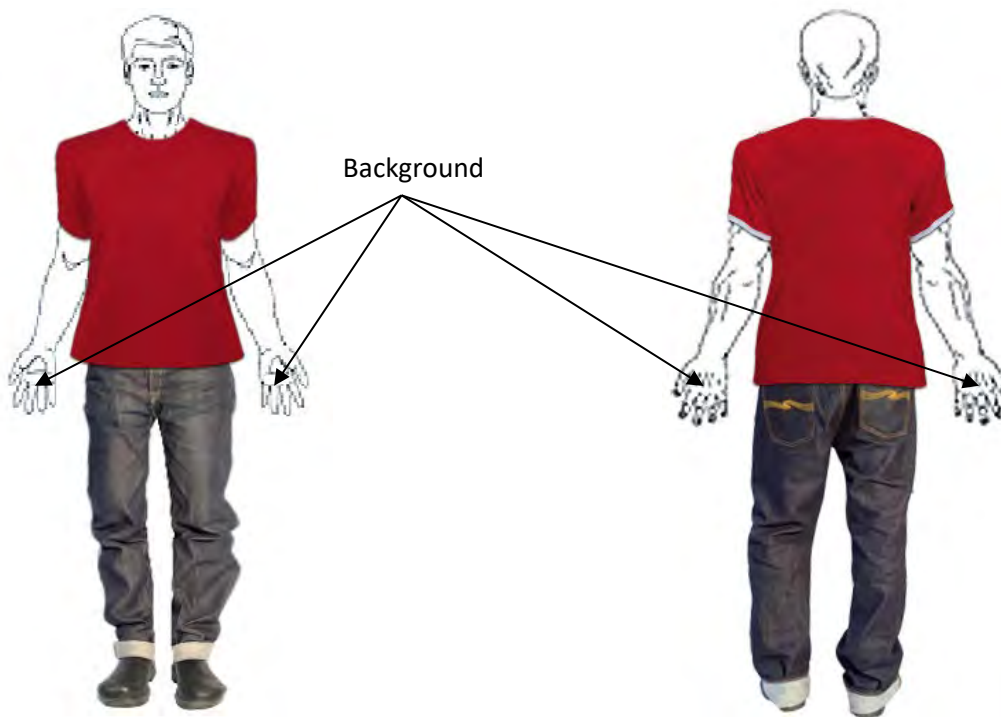
Congregate Care Center/Reception Center		
Address:	Park High School	
	8040 80TH St. S.	
	Cottage Grove, MN	
	55016	
Contact:	Patrick McLaughlin	
Telephone:	217-685-3494	
Date:	June 28, 2023	
Time:	1700 CDT	

RECEPTION CENTER PERSONAL DECON

Contaminated Person #1: Male or Female



Before Decon
Hands gloves on/off – 3000 CPM



1 st Decon
Hands – Background



UNCLASSIFIED

RECEPTION CENTER VEHICLE DECON

Contaminated Vehicle



Before Decon

Driver Door Handle – 2500 CPM

UNCLASSIFIED



1st Decon

Driver Door Handle – Background

Section 5: Acronyms

ACRONYM	DESCRIPTION
AAR	After Action Report
CDT	Central Daylight Time
CFR	Code of Federal Regulation
cpm	counts per minute
DCO	Dosimetry Control Officer
DLR	Dosimeter of Legal Record
DRD	Direct-Reading Dosimeter
ECL	Emergency Classification Level
EPZ	Emergency Planning Zone
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
HSEM	Homeland Security Emergency Management
KI	potassium iodide
ORO	Off-Site Response Organization
PPE	Personal Protective Equipment
RAC	Regional Assistance Committee
REP	Radiological Emergency Preparedness