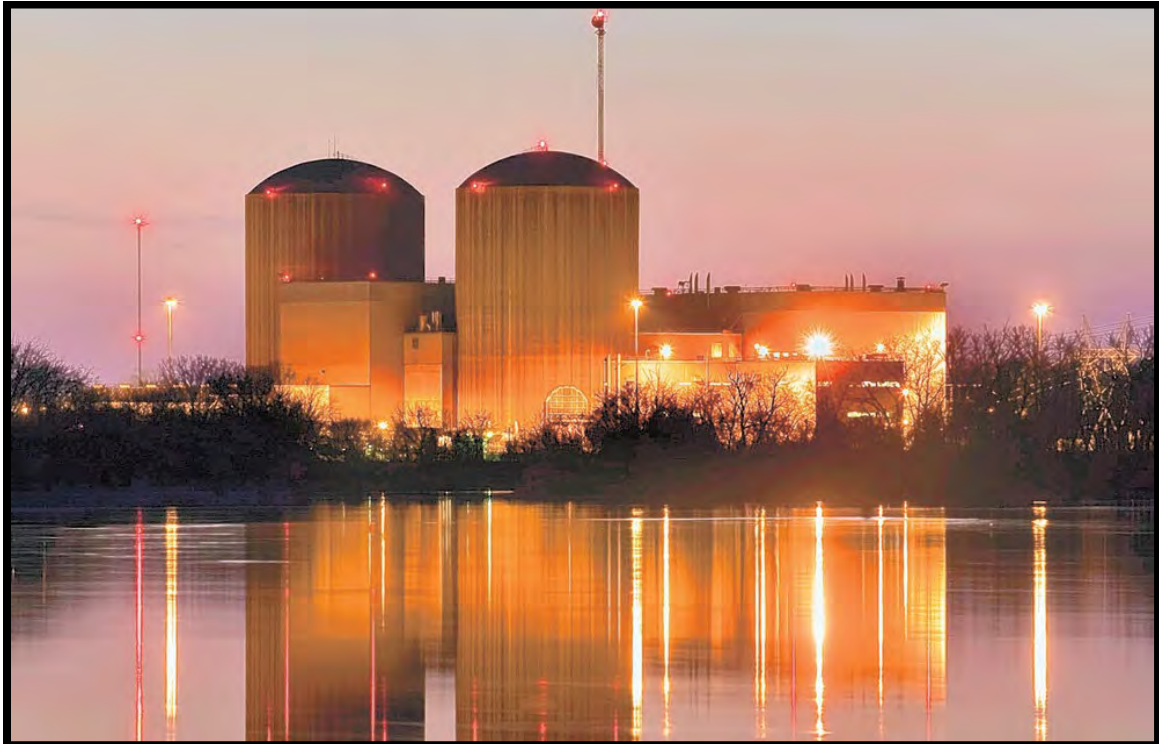


After Action Report/ Improvement Plan

Exercise Date – October 20, 2020

Radiological Emergency Preparedness (REP) Program



Prairie Island Nuclear Generating Plant



FEMA

Published December 1, 2020

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EXECUTIVE SUMMARY

On October 20, 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 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 exercise 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 July 17, 2018. The qualifying emergency preparedness exercise was conducted on December 8, 1981.

Officials and representatives from the State of Minnesota, the State of Wisconsin and the risk counties of Goodhue, Dakota, and Pierce 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, the State of Wisconsin, Goodhue, Dakota, and Pierce Counties as a result of the 2020 PINGP Exercise.

The DHS/FEMA wishes to acknowledge the efforts of the many individuals who participated in the exercise and made it a success. Approximately 125 individuals participated in the offsite portion of the exercise, including many PINGP owner/operator personnel and local volunteers.

The ongoing COVID-19 Pandemic and other disasters that occurred during 2020 presented the State of Minnesota 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 Minnesota Homeland Security and Emergency Management (HSEM), the State of Wisconsin Emergency Management (WEM), Goodhue, Dakota, and Pierce 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 Minnesota requested and received Actual Incident Credit for public information elements of Evaluation Criterion 5.b.1. The State of Wisconsin requested and received Partial Incident Credit for Medical Services Hospital elements of Evaluation Criterion 6.d.1.

Goodhue County requested and received substantial Actual Incident Credit for Evaluation Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criteria 5.b.1.

Dakota County requested and received substantial Actual Incident Credit for Evaluation Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criteria 3.d.2 and 5.b.1.

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Pierce County requested and received substantial Actual Incident Credit for Evaluation Criteria 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criteria 3.d.2, 5.b.1, and 6.d.1 (Transportation).

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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 October 20, 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 Prairie Island Nuclear Generating 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 exercise Scenario and Extent-of-Play Agreements submitted by the State of Minnesota and Goodhue and Dakota Counties on September 4, 2020, were approved by the DHS/FEMA Region V RAC Chair on September 14, 2020.

The Scenario and Extent-of-Play Agreements submitted by the State of Wisconsin and Pierce County on September 10, 2020, were approved by the DHS/FEMA Region V RAC Chair on September 14, 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 Minnesota 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 Minnesota was approved by DHS/FEMA Region V on April 8, 2020 for Evaluation Criterion 5.b.1.

Actual Incident Credit for the State of Wisconsin was approved by DHS/FEMA Region V on July 7, 2020 for Evaluation Criterion 6.d.1 (Hospital).

Actual Incident Credit for Goodhue County was approved by DHS/FEMA Region V on July 31, 2020 for Evaluation Criterion 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criterion 5.b.1.

Actual Incident Credit for Dakota County was approved by DHS/FEMA Region V on August 12, 2020 for Evaluation Criterion 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criterion 3.d.2 and 5.b.1

Actual Incident Credit for Pierce County was approved by DHS/FEMA Region V on July 7, 2020 for Evaluation Criterion 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1, and Partial Incident Credit for Criterion 3.d.2, 5.b.1, and 6.d.1 (Transportation).

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

Prairie Island Nuclear Generating Plant Radiological Emergency Preparedness, Partial Participation, Plume Exposure Pathway Exercise

TYPE OF EXERCISE

Plume Exposure Pathway

EXERCISE DATE

October 20, 2020

LOCATIONS

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

SPONSORS

Minnesota Homeland Security and Emergency Management
445 Minnesota Street, Suite 223
St. Paul, Minnesota 55101

Wisconsin Emergency Management
2400 Wright Street
Madison, WI 53707

Xcel Energy Inc. – Prairie Island Nuclear Generating Plant
414 Nicollet Mall
Minneapolis, Minnesota 55401

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

Minnesota Homeland Security and Emergency Management
Wisconsin Emergency Management

RISK COUNTY ORGANIZATIONS

Goodhue County

Goodhue County Emergency Management Agency
Goodhue County Department of Transportation
Goodhue County Law Enforcement
Goodhue County Department of Health & Human Services
Goodhue County Sheriff's Office
City of Red Wing Police Department

Dakota County

Dakota County Sheriff's Office
Dakota County Board of Commissioners
Dakota County Emergency Management Agency

Pierce County

Pierce County Emergency Management
Pierce County Department of Health
Pierce County Sheriff's Department
Elmwood Police Department
Elmwood Ambulance Service

PRIVATE ORGANIZATIONS

Cottage Grove Ambulance
Regions Hospital
Sacred Heart Hospital
St. Elizabeth Hospital
Wabasha Emergency Services

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 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 Prairie Island Nuclear Generating Plant to FEMA Region V by the State of Minnesota and involved local jurisdictions occurred on March 12, 1981, and the State of Wisconsin and involved local jurisdictions on April 6, 1981. Formal approval of these RERPs was granted by the FEMA to the State of Minnesota during September 1985 and to the State of Wisconsin during May 1985, 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 Minnesota, the State of Wisconsin and the risk counties of Goodhue, Dakota, and Pierce. 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 3.1.6, 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 Minnesota, the State of Wisconsin and the risk counties of Goodhue, Dakota, and Pierce. The organizations, locations, and evaluation criteria selected are described in Appendix E, Extent-of-Play Agreements were approved by DHS/FEMA on September 14, 2020.

The results of the assessment are summarized below by Core Capability, as demonstrated during the October 20, 2020, PINGP 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. Minnesota Homeland Security Emergency Management Planning and Assessment Center demonstrated proficiency in the use of dose assessment software to calculate dose projections independent of the PINGPs 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 PINGP Joint Public Information Center and at the Goodhue, Dakota, and Pierce 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 PINGP 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 Goodhue, Dakota, and Pierce Counties to address impediments to mass evacuation. Goodhue, Dakota, and Pierce 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 3.1.6 present the results and findings of the evaluation of all jurisdictions and functional entities that participated in the October 20, 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 Minnesota

DATE: October 20, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	State of Minnesota EOC PIO Hotline
Emergency Operations Management		
Mobilization	1a1	NS
Facilities	1b1	NS
Direction and Control	1c1	NS
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	NS
RESERVED	5a2	NS
Backup Alert & Notification	5a3	NS
Exception Area Alerting	5a4	NS
Subsequent Information & Instructions	5b1	C
Support Operations and Facilities		
Reception Center Operations	6a1	NS
EW Monitoring & Decontamination	6b1	NS
Congregate Care	6c1	NS
Contaminated Injured Transport & Care	6d1	NS

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

DATE: September 23 and 25, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	State of Minnesota St. Elizabeth Hospital MS-1	State of Minnesota Wabash EMS MS-1	State of Minnesota Regions Hospital MS-1	State of Minnesota Cottage Grove EMS MS-1
Emergency Operations Management					
Mobilization	1a1	NS	NS	NS	NS
Facilities	1b1	NA	NA	NA	NA
Direction and Control	1c1	NA	NA	NA	NA
Communications Equipment	1d1	NS	NS	NS	NS
Equipment and Supplies to Support Operations	1e1	M	M	M	M
Protective Action Decision-Making					
EW Exposure Control Decisions	2a1	NA	NA	NA	NA
PARs	2b1	NA	NA	NA	NA
PADs	2b2	NA	NA	NA	NA
PADs for Disabled/Functional Needs	2c1	NA	NA	NA	NA
Ingestion PADs	2d1	NA	NA	NA	NA
RRR Decisions	2e1	NA	NA	NA	NA
Protective Action Implementation					
EW Exposure Control Implementation	3a1	M	M	M	M
KI Public/Institutionalized	3b1	NA	NA	NA	NA
PAD Implementation Disabled/Functional Needs	3c1	NA	NA	NA	NA
PAD Implementation Schools	3c2	NA	NA	NA	NA
TACP Establishment	3d1	NA	NA	NA	NA
Impediments	3d2	NA	NA	NA	NA
Implement Ingestion PADs	3e1	NA	NA	NA	NA
Ingestion Pathway Decisions	3e2	NA	NA	NA	NA
Implementation of RRR Decisions	3f1	NA	NA	NA	NA
Field Measurement and Analysis					
RESERVED	4a1	NA	NA	NA	NA
Field Team Management	4a2	NA	NA	NA	NA
Field Team Operations	4a3	NA	NA	NA	NA
Field Team Sampling	4b1	NA	NA	NA	NA
Laboratory Operations	4c1	NA	NA	NA	NA
Emergency Notification and Public Info					
Initial Alert & Notification	5a1	NA	NA	NA	NA
RESERVED	5a2	NA	NA	NA	NA
Backup Alert & Notification	5a3	NA	NA	NA	NA
Exception Area Alerting	5a4	NA	NA	NA	NA
Subsequent Information & Instructions	5b1	NA	NA	NA	NA
Support Operations and Facilities					
Reception Center Operations	6a1	NA	NA	NA	NA
EW Monitoring & Decontamination	6b1	NA	NA	NA	NA
Congregate Care	6c1	NA	NA	NA	NA
Contaminated Injured Transport & Care	6d1	M	M	M	M

Table 3.1.3 – Summary of Exercise Evaluation – Goodhue County

DATE: October 20, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC
Emergency Operations Management		
Mobilization	1a1	C
Facilities	1b1	NS
Direction and Control	1c1	C
Communications Equipment	1d1	C
Equipment and Supplies to Support Operations	1e1	C
Protective Action Decision-Making		
EW Exposure Control Decisions	2a1	M
PARs	2b1	NA
PADs	2b2	NS
PADs for Disabled/Functional Needs	2c1	C
Ingestion PADs	2d1	NA
RRR Decisions	2e1	NS
Protective Action Implementation		
EW Exposure Control Implementation	3a1	M
KI Public/Institutionalized	3b1	M
PAD Implementation Disabled/Functional Needs	3c1	C
PAD Implementation Schools	3c2	M
TACP Establishment	3d1	C
Impediments	3d2	M
Implement Ingestion PADs	3e1	NA
Ingestion Pathway Decisions	3e2	NA
Implementation of RRR Decisions	3f1	NS
Field Measurement and Analysis		
RESERVED	4a1	NA
Field Team Management	4a2	NA
Field Team Operations	4a3	NA
Field Team Sampling	4b1	NA
Laboratory Operations	4c1	NA
Emergency Notification and Public Info		
Initial Alert & Notification	5a1	M
RESERVED	5a2	NA
Backup Alert & Notification	5a3	NS
Exception Area Alerting	5a4	NA
Subsequent Information & Instructions	5b1	M
Support Operations and Facilities		
Reception Center Operations	6a1	NS
EW Monitoring & Decontamination	6b1	NS
Congregate Care	6c1	NS
Contaminated Injured Transport & Care	6d1	NA

Table 3.1.4 – Summary of Exercise Evaluation – Dakota County

DATE: October 20, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC
Emergency Operations Management		
Mobilization	1a1	C
Facilities	1b1	NS
Direction and Control	1c1	C
Communications Equipment	1d1	C
Equipment and Supplies to Support Operations	1e1	C
Protective Action Decision-Making		
EW Exposure Control Decisions	2a1	M
PARs	2b1	NA
PADs	2b2	NS
PADs for Disabled/Functional Needs	2c1	C
Ingestion PADs	2d1	NA
RRR Decisions	2e1	NS
Protective Action Implementation		
EW Exposure Control Implementation	3a1	M
KI Public/Institutionalized	3b1	M
PAD Implementation Disabled/Functional Needs	3c1	C
PAD Implementation Schools	3c2	M
TACP Establishment	3d1	C
Impediments	3d2	M
Implement Ingestion PADs	3e1	NA
Ingestion Pathway Decisions	3e2	NA
Implementation of RRR Decisions	3f1	NS
Field Measurement and Analysis		
RESERVED	4a1	NA
Field Team Management	4a2	NA
Field Team Operations	4a3	NA
Field Team Sampling	4b1	NA
Laboratory Operations	4c1	NA
Emergency Notification and Public Info		
Initial Alert & Notification	5a1	M
RESERVED	5a2	NA
Backup Alert & Notification	5a3	NS
Exception Area Alerting	5a4	NA
Subsequent Information & Instructions	5b1	M
Support Operations and Facilities		
Reception Center Operations	6a1	NS
EW Monitoring & Decontamination	6b1	NS
Congregate Care	6c1	NS
Contaminated Injured Transport & Care	6d1	NA

**Table 3.1.5 – Summary of Exercise Evaluation– State of Wisconsin
Out-of-Sequence Activities**

DATE: October 13, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	State of WI Sacred Heart Hospital MS-1 Facility
Emergency Operations Management		
Mobilization	1a1	NS
Facilities	1b1	NA
Direction and Control	1c1	NA
Communications Equipment	1d1	NS
Equipment and Supplies to Support Operations	1e1	M
Protective Action Decision-Making		
EW Exposure Control Decisions	2a1	NA
PARs	2b1	NA
PADs	2b2	NA
PADs for Disabled/Functional Needs	2c1	NA
Ingestion PADs	2d1	NA
RRR Decisions	2e1	NA
Protective Action Implementation		
EW Exposure Control Implementation	3a1	M
KI Public/Institutionalized	3b1	NA
PAD Implementation Disabled/Functional Needs	3c1	NA
PAD Implementation Schools	3c2	NA
TACP Establishment	3d1	NA
Impediments	3d2	NA
Implement Ingestion PADs	3e1	NA
Ingestion Pathway Decisions	3e2	NA
Implementation of RRR Decisions	3f1	NA
Field Measurement and Analysis		
RESERVED	4a1	NA
Field Team Management	4a2	NA
Field Team Operations	4a3	NA
Field Team Sampling	4b1	NA
Laboratory Operations	4c1	NA
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	M

Table 3.1.6 – Summary of Exercise Evaluation– Pierce County

DATE: October 20, 2020 SITE: Prairie Island Nuclear Generating Plant M: Met NA: Not Applicable NS: Not Selected C: Credit (Actual Incident)	CRITERION	EOC	Elmwood Ambulance Services MS-1
Emergency Operations Management			
Mobilization	1a1	C	NS
Facilities	1b1	NS	NA
Direction and Control	1c1	C	NA
Communications Equipment	1d1	C	NS
Equipment and Supplies to Support Operations	1e1	C	M
Protective Action Decision-Making			
EW Exposure Control Decisions	2a1	M	NA
PARs	2b1	NA	NA
PADs	2b2	NS	NA
PADs for Disabled/Functional Needs	2c1	NS	NA
Ingestion PADs	2d1	NA	NA
RRR Decisions	2e1	NS	NA
Protective Action Implementation			
EW Exposure Control Implementation	3a1	M	M
KI Public/Institutionalized	3b1	M	NA
PAD Implementation Disabled/Functional Needs	3c1	NS	NA
PAD Implementation Schools	3c2	M	NA
TACP Establishment	3d1	C	NA
Impediments	3d2	M	NA
Implement Ingestion PADs	3e1	NA	NA
Ingestion Pathway Decisions	3e2	NA	NA
Implementation of RRR Decisions	3f1	NS	NA
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	NA
RESERVED	5a2	NA	NA
Backup Alert & Notification	5a3	NS	NA
Exception Area Alerting	5a4	NA	NA
Subsequent Information & Instructions	5b1	M	NA
Support Operations and Facilities			
Reception Center Operations	6a1	NS	NA
EW Monitoring & Decontamination	6b1	NS	NA
Congregate Care	6c1	NS	NA
Contaminated Injured Transport & Care	6d1	NS	M

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, 3.1.5, and 3.1.6.

3.2.1 State of Minnesota Out-of-Sequence Demonstrations

3.2.1.1 St. Elizabeth's Hospital – Wabasha Ambulance Service

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

3.2.1.2 St. Elizabeth's Hospital – Facility

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

3.2.1.3 Regions Hospital – Cottage Grove Ambulance Service

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

3.2.1.4 Regions Hospital – Facility

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for the State of Minnesota 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 State of Wisconsin Out-of-Sequence Demonstrations

3.2.2.1 Sacred Heart Hospital – Facility

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for the State of Wisconsin 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 Risk Jurisdiction – Goodhue County

3.2.3.1 Goodhue County EOC

- Criterion 2.a.1 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
Core Capability: Situational Assessment
- Criterion 2.b.2 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
Core Capability: Operational Communications
Core Capability: Situational Assessment
- Criterion 3.a.1 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
- Criterion 3.b.1 – 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.a.1 – Core Capability: Operational Coordination**
Core Capability: Public Information and Warning
- Criterion 5.b.1 – Core Capability: Public Information and Warning**
Core Capability: Operational Coordination
Core Capability: Operation Communication

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for Goodhue 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 Risk Jurisdiction – Dakota County

3.2.4.1 Dakota County EOC

- Criterion 2.a.1 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
Core Capability: Situational Assessment
- Criterion 2.b.2 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
Core Capability: Operational Communications
Core Capability: Situational Assessment
- Criterion 3.a.1 – Core Capability: Operational Coordination**
Core Capability: Environmental Response/Health and Safety
- 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.a.1 – Core Capability: Operational Coordination**
Core Capability: Public Information and Warning
- Criterion 5.b.1 – Core Capability: Public Information and Warning**
Core Capability: Operational Coordination
Core Capability: Operation Communications

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for Dakota 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

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3.2.5 Pierce County

3.2.5.1 Pierce County EOC

Criterion 2.a.1 – Core Capability: Operational Coordination
Core Capability: Environmental Response/Health and Safety
Core Capability: Situational Assessment

Criterion 2.b.2 – Core Capability: Operational Coordination
Core Capability: Environmental Response/Health and Safety
Core Capability: Operational Communications
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.a.1 – Core Capability: Operational Coordination
Core Capability: Public Information and Warning

Criterion 5.b.1 – Core Capability: Public Information and Warning
Core Capability: Operational Coordination
Core Capability: Operation Communications

3.2.5.2 Sacred Heart Hospital – Elmwood Ambulance Service

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 6.d.1 – Core Capability: Operational Coordination

Core Capability: Environmental Response/Health and Safety

Core Capability: Public Health and Medical Services

In summary, the status of DHS/FEMA-evaluated core capabilities and criteria for Pierce 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

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SECTION 4: Conclusion

The DHS/FEMA evaluation team identified no Findings and no Plan Issues for the State of Minnesota and the State of Wisconsin during the 2020 PINGP Exercise. No Findings or Plan Issues were identified for Goodhue, Dakota, and Pierce Counties as a result of the exercise. The ongoing COVID-19 Pandemic and other disasters that occurred during 2020 presented the State of Minnesota and the State of Wisconsin 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 Minnesota, the State of Wisconsin, 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 Minnesota and the State of Wisconsin, 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 October 20, 2020, Prairie Island Nuclear Generating Plant, Partial Participation, Plume Exposure Pathway REP Exercise to test the offsite emergency response capabilities of State and local governments in the 10-mile EPZ surrounding the PINGP, recommended corrective actions, and a schedule of corrective actions for the identified primary responsible agency.

The DHS/FEMA evaluation team identified no Level 1 or Level 2 Findings and no Plan Issues for the State of Minnesota during the 2020 PINGP exercise. No Findings or Plan Issues were identified for Goodhue, Dakota, and Pierce Counties as a result of the exercise.

The ongoing COVID-19 Pandemic and other disasters that occurred during 2020 presented the State of Minnesota and the State of Wisconsin 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 Minnesota Homeland Security and Emergency Management, State of Wisconsin Emergency Management, and for Goodhue, Dakota, and Pierce Counties 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 Minnesota and the State of Wisconsin 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

The PINGP Radiological Emergency Preparedness Exercise was conducted via Out-of-Sequence events by means of separate guided discussions and interviews. The format in which the criterion demonstrations took place did not include the use of an Exercise Timeline.

APPENDIX C: Exercise Evaluation Team

SITE: Prairie Island Nuclear Generating Plant

EXERCISE DATE: October 20, 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
Minnesota Site Specialist	Edward Diaz	DHS/FEMA
Wisconsin Site Specialist	James King	DHS/FEMA
Team Leader – State of Minnesota	Edward Diaz	DHS/FEMA
Team Leader – State of Wisconsin	James King	DHS/FEMA
Team Leader – Goodhue County	Edward Diaz	DHS/FEMA
Team Leader – Dakota County	Curtis Williams	DHS/FEMA
Team Leader – Pierce County	James King	DHS/FEMA

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
State of Minnesota – Out-of-Sequence		
Minnesota – St. Elizabeth’s Medical Center Facility – MS-1	Edward Diaz	DHS/FEMA
Minnesota – Wabasha Emergency Services Ambulance – MS-1	James King	DHS/FEMA
Minnesota – Regions Hospital Facility – MS-1	Edward Diaz	DHS/FEMA
Minnesota – Cottage Grove Emergency Services Ambulance – MS-1	James King	DHS/FEMA

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
State of Wisconsin – Out-of-Sequence		
Wisconsin – Sacred Heart Hospital Facility – MS-1	Edward Diaz	DHS/FEMA

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
Goodhue County		
Goodhue County – EOC	Edward Diaz	DHS/FEMA
Goodhue County – EOC	Brett Beardsley	DHS/FEMA

Evaluated Offsite Response Organizations/Locations	Evaluator	Agency/ Organization
Dakota County		
Dakota County – EOC	David Persaud	DHS/FEMA
Dakota County – EOC	Curtis Williams	DHS/FEMA
Pierce County		
Pierce County – EOC	James King	DHS/FEMA
Pierce County – EOC	Todd Gemske	DHS/FEMA
Pierce County – Elmwood Emergency Services Ambulance – MS-1	James King	DHS/FEMA

APPENDIX D: Acronyms

ACRONYM	DESCRIPTION
AAR/IP	After Action Report/Improvement Plan
CDT	Central Daylight Time
CFR	Code of Federal Regulations
cpm	counts per minute
DHS	Department of Homeland Security
DPS	Department of Public Safety
DRD	Direct-Reading Dosimeters
EAS	Emergency Alert System
ECL	Emergency Classification Level
ED	Emergency Department
EMA	Emergency Management Agency
EMD	Emergency Management Director
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EPZ	Emergency Planning Zone
EW	Emergency Worker
FD	Fire Department
FEMA	Federal Emergency Management Agency
GAR	Governor Authorized Representative
GE	General Emergency
HSEM	Homeland Security and Emergency Management
IC	Incident Commander
IPAWS	Integrated Public Alert and Warning System
IWP	Initial Warning Point
JIC	Joint Information Center
KI	potassium iodide
MDOT	Minnesota Department of Transportation
Mg	Milligram(s)
MHz	MegaHertz
mR	milliRoentgen(s)
MS-1	Medical Services (Facility & Transportation Drills) – Reference to FEMA REP Guidance Memorandum GM MS-1, Medical Services, November 13, 1986.
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization(s)
PAC	Planning and Assessment Center
PAD	Protective Action Decision
PAR	Protective Action Recommendations
REP	Radiological Emergency Preparedness
PINGP	Prairie Island Nuclear Generating Plant

UNCLASSIFIED
Radiological Emergency Preparedness (REP) Program

After Action Report/Improvement Plan

Prairie Island Nuclear Generating Plant

ACRONYM	DESCRIPTION
PIO	Public Information Officer
PPE	Personal Protective Equipment
PRD	Permanent Record Dosimeter
R	Roentgen
RAC	Regional Assistance Committee
REA	Radiation Emergency Area
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
RO	Radiological Officer
SAE	Site Area Emergency
SEOC	State Emergency Operations Center
SIM	State Incident Manager
SOG	Standard Operating Guideline/Suggested Operational Guidance
TACP	Traffic Access Control Point
TEDE	Total Effective Dose Equivalent
TLD	Thermoluminescent Dosimeter

APPENDIX E: Extent-of-Play Agreements

2020 Prairie Island Nuclear Generating Plant Plume Phase Exercise Extent of Play Agreement State of Minnesota, Goodhue County, and Dakota County

The Prairie Island Nuclear Generating Plant Exercise will take place October 20. The exercise will consist of virtual demonstrations using Microsoft Teams or other similar platform – The platform will not be evaluated.

Upcoming Events

Date	Time	Event
Sept. 23 rd	0900	St. Elizabeth's and Wabasha Ambulance Exercise
Sept 25 th	0900	Regions Hospital and Cottage Grove Ambulance Exercise
Sept. 30 th	0900	Goodhue County Table Top Exercises on Emergency Worker Briefings and Traffic Impediments
Oct. 6 th	0900	Dakota County Table Top Exercise on Emergency Worker Briefings and Traffic Impediments
Oct 19 th		FEMA Entrance Meeting
Oct 20 th	0900	Table Top Exercise with Dakota, Goodhue, Pierce Counties and State of Wisconsin
Oct. 23 rd	0900	FEMA Exit Meetings

PREVIOUS EXERCISE FINDINGS AND PLAN ISSUES

State of Minnesota, Goodhue and Dakota County

There are no unresolved findings.

CREDIT FOR THE COVID RESPONSE

State of Minnesota

The State of Minnesota received credit for the 5.b.1 – Hotline Response

Goodhue County

Goodhue County received credit for 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, 3.d.1 and partial credit for 5.b.1.

Dakota County

Dakota County received credit for 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, and 3.d.1 and partial credit for 3.d.2 and 5.b.1.

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

SUB-ELEMENT 1.a - Mobilization

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

State of Minnesota

Not selected for this exercise

Goodhue County and Dakota County

The counties received credit for activating their EOCs due to the Covid response

SUB-ELEMENT 1.b - Facilities

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

State of Minnesota, Goodhue County, Dakota County

This criterion is not selected for evaluation.

SUB-ELEMENT 1.c - Direction and Control

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

State of Minnesota Goodhue County and Dakota County

This criterion is not selected for this exercise.

Goodhue and Dakota County

Direction and control was demonstrated for the Covid Response

SUB-ELEMENT 1.d - Communications Equipment

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations.

Communications capabilities are managed in support of emergency operations.

State of Minnesota

This criterion is not selected for evaluation,

Goodhue and Dakota County

The counties received credit for this criterion due to their Covid response.

SUB-ELEMENT 1.e - Equipment and Supplies to Support Operations

Criterion 1.e.1: Equipment, maps, displays, dosimetry, KI, and other supplies are sufficient to support emergency operations.

State of Minnesota

This criterion is not selected for this exercise.

Goodhue and Dakota County

The counties received credit for this criterion due to their Covid response.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION-MAKING

SUB-ELEMENT 2.a – Emergency Worker Exposure Control

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 PAGs.

State of Minnesota

This criterion is not selected for this exercise, but the State of Minnesota will participate to allow the counties to demonstrate their selected criteria.

Goodhue County, Dakota County

The Goodhue and Dakota County Radiological Officers will instruct county emergency workers to take KI after the recommendation is made by the SEOC Planning and Assessment Center (PAC).

All emergency workers inside the 10-mile EPZ have a radiation dose limit of 5 rem and a turnback limit of 1 R.

The Radiological Officers will be interviewed on the process to exceed dose, if the scenario does not have emergency workers exceeding dose.

SUB-ELEMENT 2.b – Dose Assessment & PARs & PADs for the Emergency Event

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

State of Minnesota

This criterion is not selected for this exercise.

Goodhue County, Dakota County

This is a State function, the counties will not demonstrate this criterion.

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

State of Minnesota

This criterion is not selected for this exercise, but the State of Minnesota will participate to allow the risk counties and Wisconsin to demonstrate their criteria.

This will occur during a virtual table top exercise with the State of Minnesota, Wisconsin, Goodhue, Dakota and Pierce County. The states and counties will be given injects guiding the participants through the ECLs. After each inject, the State of Minnesota will give a PowerPoint presentation explaining what has been accomplished at each ECL. At the General Emergency, the two states will receive a Protective Action Recommendation (PAR). The two state assessment centers will agree on the PAR and once there is concurrence, the State of Minnesota will ask each county if they concur. Once each county agrees, the state will work with Wisconsin to ensure that Pierce County also has concurred with the PAR. Once everyone has agreed, the two GARs will sign to make the PAR a Protective Action Decision (PAD). KI will be part of the PAR for both Emergency Workers and General Workers.

Goodhue County, Dakota County

Goodhue and Dakota Counties will participate in the protective action decision process during the table top exercise in accordance with the state's PAD process. This includes concurrence and coordination between the Minnesota SEOC, Goodhue County, Dakota County and Pierce County along with the State of Wisconsin.

SUB-ELEMENT 2.c – PADs for the Protection of persons with disabilities and access/functional needs

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

State of Minnesota

This criterion is not selected for this exercise.

Goodhue County, Dakota County

The counties received credit for this criterion due to their Covid response.

SUB-ELEMENT 2.d – Radiological Assessment and Decision-Making for the Ingestion Exposure Pathway

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

State of Minnesota, Goodhue, Dakota and Ingestion Counties

This criterion is not selected for evaluation.

SUB-ELEMENT 2.e – Radiological Assessment & Decision-making Concerning Post-Plume Phase Relocation, Re-entry, and Return

Criterion 2.e.1: Timely post-plume phase relocation, re-entry, and return decisions are made and coordinated as appropriate, based on assessments of radiological conditions and criteria in the ORO's plan and/or procedures.

State of Minnesota, Goodhue, Dakota and Ingestion Counties

This criterion is not selected for evaluation.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

SUB-ELEMENT 3.a – Implementation of Emergency Worker Exposure Control

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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

State of Minnesota, Goodhue, Dakota County

All emergency workers will demonstrate appropriate use of dosimetry, turn back limits and record keeping in accordance with their established procedures/guidelines. Participants will demonstrate the capability to accomplish distribution of KI to emergency workers consistent with decisions made. Emergency workers will demonstrate basic knowledge of procedures for using KI. These tasks will be accomplished in a separate (virtual out-of-sequence exercise) by an interview with the evaluator.

Separate virtual interviews will be conducted for the hospitals, EMS, Goodhue and Dakota Counties. Two emergency worker will receive an emergency worker briefing by a controller or a county rad officer then will be interviewed separately by an evaluator. Emergency Worker briefings may be obtained in one of three ways: a verbal briefing, read and sign form within the Emergency Worker Handbooks as well as watching the video.

SUB-ELEMENT 3.b – Implementation of KI Decision for Institutionalized Individuals and the Public

Criterion 3.b.1: KI and appropriate instructions are made available in case 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.

State of Minnesota

This criterion is not selected for this exercise.

Goodhue and Dakota County

Goodhue and Dakota Counties will demonstrate the capability to accomplish the distribution of KI consistent with decisions made. They will demonstrate the ability to develop and maintain lists of institutionalized individuals who have ingested KI, including documentation of the date(s) and time(s) they were instructed to ingest KI. For evaluation purposes, this will be conducted by interview virtually and the counties can provide the necessary forms to the evaluators.

SUB-ELEMENT 3.c – Implementation of Protective Actions for persons with disabilities and access/functional needs

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

State of Minnesota

This is a county responsibility and will not be demonstrated by the state.

Goodhue and Dakota County

The counties received credit for this criterion due to their Covid response.

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

State of Minnesota

This criterion is not selected for this exercise.

Goodhue County

Goodhue County received credit for this criterion due to their Covid response and the county EOC will also demonstrate this criterion during the virtual table top exercise.

Dakota County

The county EOC will demonstrate this criterion during the virtual table top exercise.

SUB-ELEMENT 3.d – Implementation of Traffic and Access Control

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

State of Minnesota

This criterion is not selected for this exercise.

Goodhue and Dakota County

The counties received credit for this criterion due to their Covid response.

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

State of Minnesota

This criterion is not selected for this exercise, but the State of Minnesota will participate to allow the counties to demonstrate their selected criteria.

Goodhue County, Dakota County

A controller message will be used to create a simulated evacuation impediment. Each county will demonstrate how they would re-route traffic and provide a map to the state with re-route directions. For evaluation purposes this will be conducted during separate virtual table top exercises for each county.

SUB-ELEMENT 3.e – Implementation of Ingestion Pathway Decisions

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.

State of Minnesota, Goodhue, Dakota and Ingestion Counties

This criterion was not selected for this exercise.

Criterion 3.e.2: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing PADs for contaminated water, food products, milk, and agricultural production.

State of Minnesota, Goodhue, Dakota and Ingestion Counties

This criterion was not selected for this exercise.

SUB-ELEMENT 3.f – Implementation of Post-Plume Phase Relocation, Re-entry, and Return Decisions

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

State of Minnesota, Goodhue, Dakota and Ingestion Counties

This criterion was not selected for this exercise.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

SUB-ELEMENT 4.a – Plume Phase Field Measurement and Analyses

Criterion 4.a.1: [RESERVED]

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

State of Minnesota

This criterion is not selected for this exercise.

Goodhue County, Dakota County

This is a state function and will not be demonstrated by the counties.

Criterion 4.a.3: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media.

State of Minnesota

This criterion is not selected for this exercise.

Goodhue County, Dakota County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 4.b – Post Plume Phase Field Measurements and Sampling

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

State of Minnesota

This criterion was not selected for this exercise.

Goodhue County, Dakota County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 4.c – Laboratory Operations

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

State of Minnesota

This criterion was not selected for this exercise.

Goodhue County, Dakota County

This is a state function and will not be demonstrated by the counties.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

SUB-ELEMENT AREA 5.a – Activation of the Prompt Alert and Notification System

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

State of Minnesota

This criterion is not selected for this exercise, but the State of Minnesota will participate to allow the counties to demonstrate their selected criteria.

Goodhue County and Dakota County

All EAS messages are developed and disseminated by the SEOC. For evaluation purposes, after the PAR becomes a PAD, the counties will explain to the evaluator how the siren coordination occurs. Goodhue County has the lead for siren activation. The coordination of alert implementation will be explained in an interview by members of the Goodhue and Dakota County EOCs.

Notification is the responsibility of the state and will not be demonstrated in this exercise.

Criterion 5.a.2: [RESERVED]

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

State of Minnesota

This criterion is the responsibility of the counties and will not be demonstrated by the state.

Goodhue and Dakota County

The counties have 100% siren coverage; there will not be an inoperable siren inject for demonstration.

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

State of Minnesota

This criterion is the responsibility of the counties and will not be demonstrated by the state.

Goodhue and Dakota County

This criterion is not selected for this exercise.

SUB-ELEMENT 5.b – Emergency Information and Instructions for the Public and the Media

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

State of Minnesota

The Minnesota Joint Information Center (JIC) is not selected for this exercise, but the State of Minnesota will participate to allow the counties to demonstrate their selected criteria.

The State of Minnesota received credit for the hotline during the Covid response.

Goodhue and Dakota County

The counties have received partial credit for this criterion due to their Covid response. Emergency information released to the public and the news media are the responsibility of the SEOC and the JIC. For an actual event, the County Public Information Officer (PIO) Liaisons would be located in the SEOC. For demonstration purposes, the State of Minnesota will provide a news release with the information from the PAD, each county will review and let the state know if they concur.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

SUB-ELEMENT 6.a – Monitoring, Decontamination, and Registration of Evacuees

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

State of Minnesota

The Wabasha Reception Center will be demonstrated in 2021

Goodhue County and Dakota County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 6.b – Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles

Criterion 6.b.1: The facility/ORO has adequate procedures and resources to accomplish monitoring and decontamination of emergency workers and their equipment and vehicles.

State of Minnesota

This is a county responsibility and will not be demonstrated by the state.

Goodhue County

The Cannon Falls EWD will be demonstrated in 2021.

Dakota County

This Criterion is not selected for this exercise.

SUB-ELEMENT 6.c – Temporary Care of Evacuees

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with planning guidelines. Managers

demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate before entering congregate care facilities.

State of Minnesota

This criterion was not selected for this exercise.

Goodhue County and Dakota County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 6.d – Transportation and Treatment of Contaminated Injured Individuals

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

State of Minnesota

MS-1 Transportation (Ambulance)

Regions

Cottage Grove Fire EMS Ambulance will demonstrate this objective in a separate virtual table top exercise. They will explain to the evaluator how they would handle a potentially contaminated and injured individual and will demonstrate their knowledge of exposure rates and administrative limits through an interview.

Wabasha

Wabasha Ambulance will demonstrate this objective in a separate virtual table top exercise. They will explain to the evaluator how they would handle a potentially contaminated and injured individual and will demonstrate their knowledge of exposure rates and administrative limits through an interview.

MS- 1 (Facilities)

Regions

Region's Hospital will demonstrate this objective in a virtual table top exercise. They will explain to the evaluator how they would set up their emergency room bay and receive a contaminated and injured individual. They will explain their method for monitoring and decontaminating a patient, the surveying of the ambulance crew and will demonstrate their knowledge of exposure rates and administrative limits through an interview.

Hand held survey instruments may be operationally checked in the virtual meeting if required by the evaluator.

Wabasha

St. Elizabeth's Hospital will demonstrate this objective in a virtual table top exercise. They will explain to the evaluator how they would set up their emergency room bay and receive a contaminated and injured individual. They will explain their method for monitoring and decontaminating a patient, the surveying of the ambulance crew and will demonstrate their knowledge of exposure rates and administrative limits through an interview.

Hand held survey instruments may be operationally checked in the virtual meeting if required by the evaluator.

Prairie Island Nuclear Generating Plant Virtual Exercise

Extent-of-Play Agreement

State of Wisconsin / Pierce County

TABLE-TOP EXERCISE DATE: OCTOBER 20, 2020

The Prairie Island Nuclear Generating Plant Plume Phase Exercise will take place the week of October 20, 2020. The exercise will involve out-of-sequence and in-sequence demonstrations.

PRIOR FINDINGS:

State of Wisconsin and Pierce County

Currently, there are no open Level 1 (Deficiency), Level 2 (ARCA) for the State of Wisconsin or Pierce County that need to be corrected in the Prairie Island Nuclear Generating Plant 2020 Exercise.

EXERCISE NOTES:

- This Extent-of-Play Agreement reflects the *remaining radiation-specific criteria* not covered by FEMA's approved COVID-19 exercise credit determination.
- Pierce County Emergency Management received exercise credit for its COVID-19 response for the following demonstration areas:
 - 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.c.1, 3.c.1, 3.c.2, and 3.d.1.
 - Partial Exercise Credit, supported by applicable documentation, was requested by the State of Wisconsin for Demonstration Criterion 6.d.1 (Hospital) and by Pierce County for Criteria 3.d.2, 5.b.1., and 6.d.1 (Transportation).
- All ORO representatives will demonstrate exercise activities via teleconference via MS Teams or other teleconference tools agreed upon by Wisconsin Emergency Management, Pierce County Emergency Management, and the Minnesota Department of Homeland Security and Emergency Management.
- Emergency Worker Exposure Control / The MS-1 activities (transportation) will be evaluated on October 13, 2020.
- The MS-1 Activities (hospital) will be evaluated on October 13, 2020.
- The Governor's Office is not directly participating in the exercise. Communications regarding emergency executive orders to the Governor will be simulated.
- The Wisconsin SEOC will not mobilize, but the REP/RPS sections will serve as a sim-cell to provide state-level injects to support Pierce County's response.

Overview of Exercise Schedule and Sites

Activity	Date	Time	Location	Sequence
Pre-Exercise Meeting (MN / WI)	October 19	1400	Teleconference	N/A
Exercise Activities				
WEM Exercise Credit Package Submission	July 13	N/A	Email	N/A
FEMA Exercise Credit Approval FEMA	July 21	N/A	Email	N/A
Partial Participation Plume Table-Top Exercise	October 20	0900	Teleconference	In-Sequence
MS-1 Evaluation (Sacred Heart Hospital, Eau Claire, WI.)	October 13	1000	Teleconference	Out-of-Sequence
MS-1 Evaluation / Emergency Worker Exposure Control (Elmwood Ambulance Service)	October 13	1000	Teleconference	Out-of-Sequence
Post Exercise				
FEMA players debriefing	October 23	0900	Teleconference	N/A

EVALUATION AREA 1 – EMERGENCY OPERATIONS MANAGEMENT

SUB-ELEMENT 1.a - Mobilization

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

Core Capabilities: Operational Communications

State of Wisconsin

Not selected for this exercise

Pierce County

The counties received credit for activating their EOCs due to the COVID-19 response

SUB-ELEMENT 1.b - Facilities

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

State of Wisconsin and Pierce County

This criterion is not selected for evaluation.

SUB-ELEMENT 1.c - Direction and Control

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.*

Core Capabilities: Operational Coordination; Operational Communications; Situational Assessment

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

Direction and control was demonstrated for the COVID-19 Response

SUB-ELEMENT 1.d - Communications Equipment

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

Core Capabilities: Operational Communications

State of Wisconsin

This criterion is not selected for evaluation,

Pierce County

The counties received credit for this criterion due to their COVID-19 response.

SUB-ELEMENT 1.e - Equipment and Supplies to Support Operations

Criterion 1.e.1: *Equipment, maps, displays, dosimetry, KI, and other supplies are sufficient to support emergency operations.*

Core Capabilities: Environmental Response/Health and Safety; Mass Care Services; Public & Private Services and Resources; Public Health & Medical Services

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

Pierce County received exercise credit for this criterion based on its COVID-19 response. However, KI, emergency worker kits, and dosimetry equipment are issued to emergency workers in accordance with the Pierce County Emergency Response Plan, Annex I.

EVALUATION AREA 2 – PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: Emergency Worker Exposure Control: *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. (NUREG-0654/FEMA-REP-1, C.6; J.10.e, f; K.3.a; K.4)*

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

State of Wisconsin

The State will not be evaluated for this criterion but will participate to support Pierce County's demonstration.

Pierce County

Emergency Worker Exposure Control information regarding dosimetry reading, KI, and other protection measures will be briefed via an instructional video and supplemented by an emergency worker handbook. The instructional video is located at:

<https://www.youtube.com/watch?v=zToTM838PXA&t=52s>

The radiological officer (RO) or appointed designee will be interviewed about procedures and decision-making for emergency workers exceeding dose limits. Emergency workers will be interviewed post-video to discuss dose/exposure limits, turnback, and other precautionary/safety measures in accordance with the video and emergency worker handbook.

Criterion 2.b.1: Radiological Assessment and Protective Action Recommendations: *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. (NUREG-0654/FEMA-REP-1, I.10 and Supplement 3)*

Core Capabilities: Operational Coordination; Intelligence & Information Sharing; Environmental Response/Health and Safety; Operational Communications; Situational Assessment

State of Wisconsin

This criterion is not evaluated for this exercise, but the State of Wisconsin will participate to support Pierce County's response activities.

A virtual table-top exercise coordinated by the State of Minnesota will provide the emergency response narrative to allow Pierce County to explain its emergency response procedures in accordance with the Pierce County emergency operations plans and annexes. The states and counties will be given injects guiding the participants through the ECLs. After each inject, the State of Minnesota will give a PowerPoint presentation explaining what has been accomplished at each ECL. At the General Emergency, the two states will receive a Protective Action Recommendation (PAR). The two state assessment centers will agree on the PAR and once there is concurrence, the State of Minnesota will ask each county if they concur. Once each county agrees, the HSEM will work with Wisconsin to ensure that Pierce County also has concurred with the PAR. Once everyone has agreed, the two GARs will sign to make the PAR a Protective Action Decision (PAD). KI will be part of the PAR for both Emergency Workers and General Workers. The Wisconsin GAR will be simulated by the Wisconsin REP section.

Pierce County

This criterion is not selected for this exercise.

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Criterion 2.b.2: Decisions for the Plume Phase of the Emergency: *A decision-making process involving consideration of appropriate factors and necessary coordination is used to make precautionary and/or protective action decisions for the general public (including the recommendation for the use of KI, if ORO policy). (NUREG-0654/FEMA-REP-1, A.3; C.4, 6; D.4; J.9; J.10.e,f, m)*

Core Capabilities: Operational Coordination; Intelligence & Information Sharing; Environmental Response/Health and Safety; Operational Communications; Situational Assessment

State of Wisconsin

This criterion is not selected for this exercise, but the State of Wisconsin will participate to allow Pierce County to demonstrate the criterion.

Pierce County

Pierce County will demonstrate this criterion in accordance with (IAW) the county plan/SOG via a coordinated virtual table-top exercise.

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Criterion 2.c.1: Protective Action Decision Consideration for the Protection of Persons with Disabilities and Access/Functional Needs: *Precautionary and/or protective action decisions are made, as appropriate, for groups of persons with disabilities and access/functional needs. (NUREG-0654/FEMA-REP-1, D.4; J.9; J.10.d, e)*

Core Capabilities: Operational Coordination; Operational Communications; Situational Assessment

State of Wisconsin

The State will not be evaluated for this criterion but will participate to support Pierce County's demonstration.

Pierce County

Pierce County received exercise credit for this criterion for its COVID-19 response.

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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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.*

Core Capabilities: Operational Coordination; Critical Transportation; On-scene Security and Protection; Infrastructure Systems

State of Wisconsin

This is a county, not a state requirement.

Pierce County

All emergency workers will demonstrate appropriate use of dosimetry, turn back limits and record keeping in accordance with their established procedures/guidelines. Participants will demonstrate the capability to accomplish distribution of KI to emergency workers consistent with decisions made. Emergency workers will demonstrate basic knowledge of procedures for using KI. These tasks will be accomplished in a separate (virtual out-of-sequence exercise) by an interview with the evaluator.

Separate virtual interviews will be conducted for the hospitals, EMS, and Pierce County. An emergency worker will receive an emergency worker briefing by a just-in-time emergency worker training video and then will be interviewed by an evaluator. If the scenario does not require dose to be exceeded, two emergency workers will be interviewed in Pierce County.

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Criterion 3.b.1: *KI and appropriate instructions are made available in case 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.*

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

State of Wisconsin

This criterion is a county, not a state responsibility.

Pierce County

For evaluation purposes, this will be conducted by interview virtually and the county officials can provide the necessary forms to the evaluators.

Pierce will demonstrate the capability to accomplish the distribution of KI consistent with decisions made. Pierce County will demonstrate the ability to develop and maintain lists of institutionalized individuals who have ingested KI, including documentation of the date(s) and time(s) they were instructed to ingest KI.

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

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

State of Wisconsin

This is a county responsibility and will not be demonstrated by the state.

Pierce County

The counties received credit for this criterion due to their COVID-19 response.

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

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

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

Pierce County received credit for this criterion due to its COVID-19 response.

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

Core Capabilities: Operational Coordination; Critical Transportation; On-scene Security and Protection; Infrastructure Systems

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

Pierce County received credit for this criterion due to its COVID-19 response.

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Criterion 3.d.2: Implementation of Traffic and Access Control: *Impediments to evacuation are identified and resolved. (NUREG-0654/FEMA-REP-1, J.10.k)*

Core Capabilities: Operational Coordination; Critical Transportation; On-scene Security and Protection; Infrastructure Systems

State of Wisconsin

The State will not be evaluated for this criterion but will participate to support Pierce County's demonstration.

Pierce County

A controller message will be used to create a simulated traffic impediment on the evacuation route. Pierce County officials will demonstrate how they would re-route traffic and communicate the new route to the JIC for release to the public.

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Criterion 3.e.2: *Appropriate measures, strategies, and pre-printed instructional material are developed for implementing PADs for contaminated water, food products, milk, and agricultural production.*

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

State of Wisconsin and Pierce County

This criterion was not selected for this exercise.

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SUB-ELEMENT 3.f – Implementation of Post-Plume Phase Relocation, Re-entry, and Return Decisions

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

State of Wisconsin, Pierce, and Ingestion Counties

This criterion was not selected for this exercise.

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EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

SUB-ELEMENT 4.a – Plume Phase Field Measurement and Analyses

Criterion 4.a.1: [RESERVED]

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

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

This is a state function and will not be demonstrated by the counties.

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Criterion 4.a.3: *Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media.*

State of Wisconsin

This criterion is not selected for this exercise.

Pierce County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 4.b – Post Plume Phase Field Measurements and Sampling

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

State of Wisconsin

This criterion was not selected for this exercise.

Pierce County

This is a state function and will not be demonstrated by the counties.

SUB-ELEMENT 4.c – Laboratory Operations

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

State Wisconsin

This criterion was not selected for this exercise.

Pierce County

This is a state function and will not be demonstrated by the counties.

EVALUATION AREA 5 – EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activation of the Prompt Alert and Notification System: *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:*

- 1) Identification of the ORO responsible 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 there.*
- 3) Reference to the REP-specific emergency information (e.g. brochures, calendars, and/or 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, or that the population tune to another station for additional information.*
(NUREG-0654/FEMA-REP-1, E.5, 6, 7)

Core Capabilities: Operational Coordination; Public Information and Warning; Operational Communications

State of Wisconsin

The State will not be evaluated for this criterion but will participate to support Pierce County's demonstration.

Pierce County

EAS messages are developed and disseminated by the county, not the SEOC. The SEOC Manager/OPS conduct a coordination call with Pierce County representatives to agree on a PAD and identify the appropriate EAS message. Once the PAD and EAS message are determined and identified, the Pierce County Emergency Management Director will explain the messaging procedure and coordination with Minnesota.

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Criterion 5.a.2: [RESERVED]

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

Core Capabilities: Operational Coordination; Public Information and Warning; Operational Communications

State of Wisconsin

This criterion is the responsibility of the counties and will not be demonstrated by the state.

Pierce County

Pierce County has 100% siren coverage; there will not be an inoperable siren inject for demonstration.

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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*

Core Capabilities: Operational Coordination; Public Information and Warning; Operational Communications

State of Wisconsin

This criterion is the responsibility of the county and will not be demonstrated by the state.

Pierce County

This criterion is not selected for this exercise.

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Criterion 5.b.1; Subsequent Emergency Information and Instructions for Public and the Media:
OROs provide accurate subsequent emergency information and instructions to the public and news media in a timely manner. (NUREG-0654/FEMA-REP-1, E.5, 7; G.3.a; G.4.a, c)

Core Capabilities: Public Information and Warning; Operational Communications

State of Wisconsin

During a nuclear power plant incident, the Wisconsin Emergency Management and Pierce County Public Information Officers are deployed to the Minnesota Joint Information Center (JIC). However, the Minnesota JIC is not selected for this exercise, but the State of Minnesota will participate to allow their respective risk counties and the State of Wisconsin to demonstrate their selected criteria.

Neither State public hotline will not be evaluated for this criterion.

The State of Wisconsin will not be evaluated for this criterion but will participate to support Pierce County's demonstration. The State PIO will be available to discuss state coordination procedures.

Pierce County

Pierce County received partial credit for this criterion for its COVID-19 response activities. Emergency information released to the public and the news media are the responsibility of the SEOC and the JIC. For an actual event, the State of Wisconsin and Pierce County Public Information Officer (PIO) Liaisons would be located in the Minnesota SEOC. The County PIO or designee will be available to discuss county coordination procedures.

EVALUATION AREA 6 – SUPPORT OPERATION/FACILITIES

SUB-ELEMENT 6.a – Monitoring, Decontamination, and Registration of Evacuees

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

Core Capabilities: Mass Care Services; Public Health, Healthcare, and Emergency Medical Services

State of Wisconsin

This is a county responsibility.

Pierce County

This criterion will be demonstrated in 2022.

SUB-ELEMENT 6.b – Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles

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.*

Core Capabilities: Environmental Response/Health and Safety

State of Wisconsin

This is a county responsibility and will not be demonstrated by the state.

Pierce County

This criterion is not selected for this exercise.

SUB-ELEMENT 6.c – Temporary Care of Evacuees

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

Core Capabilities: Mass Care Services; Public Health, Healthcare, and Emergency Medical Services

State of Wisconsin

This criterion was not selected for this exercise.

Pierce County

This is a state function and will not be demonstrated by the counties.

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SUB-ELEMENT 6.d – Transportation and Treatment of Contaminated Injured Individuals

Criterion 6.d.1: Transportation and Treatment of Contaminated Injured Individuals: *The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals. (NUREG-0654/FEMA-REP-1, F.2; H.10; K.5.a, b; L.1, 4)*

Core Capabilities: Mass Care Services; Public Health, Healthcare, and Emergency Medical Services

State of Wisconsin

The Department of Health Services and Sacred Heart Hospital will conduct a telephone interview to review MS-1 Treatment procedures in accordance with criteria-based questions out-of-sequence. This will take place on October 13, 2020 @~1000 CDT.

Pierce County

Pierce County Emergency Management and Elmwood Ambulance Service will demonstrate the transportation portion of this criteria during a teleconference out-of-sequence. This will take place on October 13, 2020 @~1000 CDT.

APPENDIX F: Scenario Timeline

The PINGP Radiological Emergency Preparedness Exercise was conducted via Out-of-Sequence events by means of separate guided discussions and interviews. The format in which the criterion demonstrations took place did not include the use of a Scenario Timeline