

**State of California
JOINT 2014 Annual Letter of
Certification Report**

**California Governor's Office of
Emergency Services (Cal OES)
and
California Department of Public Health
(CDPH)**



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Department of Homeland Security Federal Emergency Management Agency Radiological Emergency Preparedness Program	
ANNUAL LETTER OF CERTIFICATION TEMPLATE	
Purpose: For development of the Annual Letter of Certification (ALC) submitted by organizations for compliance with periodic requirements.	
Scope: The state ALC is reviewed to determine whether all information/documentation is included pursuant to laws and regulations and the Federal Emergency Management Agency (FEMA) Radiological Emergency Preparedness (REP) Program Manual. Information contained in the ALC is compared with the offsite response organizations (ORO) plans/procedures and the Alert and Notification System (ANS) design reports for consistency and accuracy.	Requirement: ✓ 44 CFR part 350 ✓ NUREG-0654/FEMA-REP-1 Planning Standard A. 24-Hour Staffing Capability G. Public Education and Information H. Emergency Facilities and Equipment N. Exercises and Drills O. Radiological Emergency Response Training P. Responsibility for the Planning Effort ✓ FEMA-REP-10 ✓ FEMA REP Program Manual
Confirm that the ALC includes the following items:	
Update of Plans/Procedures and Letters of Agreement	
A statement that ORO plans/procedures and Letters of Agreement (LOAs) have been reviewed for accuracy and completeness of information, and appropriate changes made. Updated LOAs and plan/procedure amendments must be submitted if not received previously.	
Cal OES: The Nuclear Power Plant Emergency Response Plan was reviewed for accuracy and completeness of information, and appropriate changes were made. Cal OES is in the process of updating plans according to the 2013 REP Manual and NUREG 0654/FEMA-REP-1, Rev. 1., Supplement 3 and Supplement 4.	
CDPH: The Nuclear Emergency Response Program (NERP) within the California Department of Public Health (CDPH) reviewed existing documentation and revised the following procedures: Procedure A-18 (Document Drafting, Review and Maintenance), Procedure E-03 (UDAC Technical Offsite Support Team), and Procedure E-11 (CDPH Emergency Worker Radiation Protection and Monitoring). See enclosed hard copies.	
Public Education and Information	
1. A statement that annual dissemination of information to the public was performed, and that the information includes how the public will be notified and what their actions should be in an emergency. This may be accomplished by, but not necessarily limited to, annual publications, periodic information in utility bills, and information in telephone books. (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2)	
This statement must include:	

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a. Dates of dissemination	
b. Means of dissemination	
c. Identification of recipients	
d. Copies of all public information materials	
Please refer to the 2014 reports for Diablo Canyon Power Plant (DCPP) and San Onofre Nuclear Generating Station (SONGS) regarding information for the General Public.	
2. A statement that emergency information was disseminated to locations frequented by transient populations in the emergency planning zone (EPZ), including (if applicable) hotels, motels, gas stations, phone booths, parks, marinas, boats, and other recreational areas. This may be accomplished by, but need not be limited to, decals, posters, or brochures/pamphlets. (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2)	
This statement must include:	
a. Dates of dissemination	
b. Means of dissemination	
c. Identification of locations where information was distributed or posted	
d. Copies of all public information materials	
e. Organizations responsible for distribution	
Please refer to the 2014 reports for DCPP and SONGS regarding details of special information for transient populations.	
3. A statement (if applicable) that yearly maintenance and updates on emergency public information signs located along rivers, parks, and other recreational areas were performed. (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2)	
This statement also:	
a. Certifies that parks and other recreational areas were not expanded, nor were new transient areas added to the plume EPZ. If expansions or additions were made, a statement must be provided that the appropriate additional signs were installed.	
b. Identifies organizations responsible for maintenance/updates	
Please refer to the 2014 reports for DCPP and SONGS regarding details of yearly maintenance and updates on emergency public information signs.	
4. A statement that emergency public information materials for the ingestion pathway were updated and distributed. (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2)	
This statement must include:	
a. Means of dissemination	
b. Copies of public information materials	
<ul style="list-style-type: none"> CDPH reviewed existing emergency agricultural ingestion pathway booklets for Diablo Canyon Power Plant (DCPP) and San Onofre Nuclear Generating Station (SONGS) and no updates are 	

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needed.	
5. A statement that annual media program was conducted to acquaint news media with emergency plans/procedures, information concerning radiation, and points of contact for release of public information in emergency. (NUREG-0654/FEMA-REP-1, Evaluation Criterion G.5)	
This statement must include:	
a. Date(s) held	
b. Agencies/organizations invited/ participated	
c. Organizations that sponsored program	
d. Description of program	
<p>NOTE: In instances of poor attendance, in lieu of a meeting, a statement that program materials covering requisite topics were mailed to media representatives must be provided.</p> <p>Annual Media Programs are maintained by the utilities and local emergency Offsite Response Organizations (OROs) surrounding DCP and SONGS. Please refer to the 2014 reports for DCP and SONGS regarding Annual Media Programs.</p>	
Radiological Emergency Response Training	
1. A statement that initial training and annual retraining of personnel who implement radiological emergency response plans/procedures have been accomplished. (NUREG-0654/FEMA-REP-1, Evaluation Criterion O.5)	
Statement must include the following for all training conducted:	
<p>Cal OES: Training of personnel who implement radiological emergency response plans/procedures was accomplished. All required organizations were offered training pursuant to ORO plans/procedures. See the enclosed hard copy, 2014 Radiological Emergency Preparedness Training Matrix for specific details.</p> <p>CDPH: Health Physicists (HPs) from CDPH participated in training at DCP and SONGS.</p> <p>CDPH provided 2 health physicists to participate at DCP UDAC training drills on January 15, 2014, April 16, 2014, June 18, 2014 and December 3, 2014. An additional HP participated at the JIC with a CDPH PIO on April 16, 2014. The training consisted of familiarization with emergency operations at the UDAC and ODAC and review of each position's procedures and responsibilities.</p> <p>Additional training for health physicists who may participate in NPP events is provided on the enclosed hard copy, <i>California Department of Public Health (CDPH) 2014 Health Physics Training Related to NPP Events</i>.</p>	
Drills	
<p>NOTE: These drills shall not be part of a regularly scheduled exercise (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2), with exception of the annual medical drill. Only non-evaluated drills need to be reported in the ALC.</p>	
1. A statement that communication drills (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2.a) were conducted:	
a. Monthly between the state and OROs within plume EPZ	California State Warning Center (CSWC) represents the State in the monthly communication drills initiated by the utilities.

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	<p>DCPP: January 2, February 6, March 6, April 3, May 1, June 5, July 3, August 7, September 4, October 2, November 6, and December 4</p> <p>SONGS: January 15, February 12, March 12, April 9, May 14, June 11, July 9, August 13, September 10, October 8, November 12, December. 10</p>
b. Quarterly between state and Federal emergency response organizations and states within ingestion pathway EPZ	Accomplished via NAWAS and CALWAS tests conducted daily and actual use.
c. Annually between NPP, state, and local emergency operations centers, and radiological field monitoring teams	<p>Communication drills were conducted annually between NPP, State, and local emergency operations centers and field monitoring teams.</p> <p>DCPP: January 15, April 16, May 21, June 18, December 3</p> <p>SONGS: October 21, October 28, November 19</p>
d. Dates of communication drills and participating organizations	<p>Refer to item c. above and the 2014 DCPP and SONGS reports for other dates communication drills and participating organizations.</p> <p>State organizations that participated in the communication drills are Cal OES, CDPH; Emergency Medical Services Authority (EMSA), California Energy Commission (CEC), California Utilities Emergency Association (CUEA); and FEMA IX.</p>
<p>2. A statement that radiological monitoring drill related to plume EPZ was conducted annually and included collection and analyses of all sample media (e.g., water, vegetation, soil, and air) with provisions for communication and record keeping. Where a state is responsible for more than one site, the state portion of drills need not be done at each site. (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2.d)</p>	
This statement must include:	
a. Dates of monitoring drills	
b. Organizations that participated	
<p>NOTE: These drills must involve personnel and resources for field team coordination and field teams.</p> <p>Local government and the utilities are responsible for field monitoring team activities during the emergency phase.</p>	
<p>3. A statement that health physics drills were conducted semiannually with licensees that included response to, and analyses of, simulated elevated airborne and liquid samples and direct radiation measurements in environment. Where a state is responsible for more than one site, the state portion of drills need not be done at each site. (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2.e)</p>	

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This statement must include:	
a. Dates of health physics drills	
b. Organizations that participated	
NOTE: Health physics drills must involve personnel and resources for dose assessment.	
Health physicists from CDPH participated in drills at DCPH and SONGS. Cal OES participated in all the DCPH UDAC drill dates listed below.	
DCPP UDAC: January 15, April 16, May 21, June 18, and December 3	
SONGS ODAC: November 19	
24-Hour Staffing (NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1.e)	
1. A statement that sufficient trained and capable staff is available to maintain 24-hour capability for protracted activation.	
Cal OES and CDPH have sufficiently trained and capable staff, and maintain adequate staffing for 24-hour operating capability throughout a protracted activation period.	
Emergency Facilities and Equipment (NUREG-0654/FEMA-REP-1, Evaluation Criteria H.3; G.3.a; J.10.h; J.12; K.5.b)	
1. Identification of facilities that are new or have had substantial changes in structure or mission since initial evaluation. A substantial change is one that has a direct affect or impact on the emergency response operations performed in those facilities.	
This statement must include:	
a. Verification that the facility has been evaluated, or the expected date of the evaluation	Cal OES State Warning Center (CSWC) and the Southern Regional Emergency Operations Center (SREOC) were evaluated during the May 21, 2014 DCPH HAB Evaluated Exercise.
There are no new emergency response facilities or any that have had substantial changes in structure or mission and none of the plans/procedures have undergone substantial changes.	
2. Certification that no substantial changes in structure or mission of previously reported facilities have occurred since initial evaluation.	
This statement must affirm that:	
a. There are no other new emergency response facilities, communications systems, or congregate care facilities	
b. None of the other current facilities, communications systems, or congregate care facilities in the plans/procedures has undergone substantial changes	
No substantial changes in structure or mission of previously reported facilities have occurred.	
3. A statement that inspection, inventory, and operational checks were made of survey instruments utilized for radiological monitoring (evacuee and emergency worker) and environmental monitoring	

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and analysis (radiological field monitoring teams and radiological laboratory) at least once each calendar quarter and upon each use. (NUREG-0654/FEMA-REP-1, Evaluation Criterion H.10)	
This statement must include:	
a. Type of equipment	
b. Quantity of equipment	
c. Location of equipment	
d. Calibration frequency	
e. Dates of inspection/inventory check	
CDPH maintained 8 μ R meters and 21 GM meters for teams who may be sent to areas of potential contamination. These instruments are located at 1616 Capitol Avenue, Sacramento, CA, and are sent out for annual calibrations. Quarterly inspection, inventory and operational checks are performed on the instruments and upon each use. Instruments were inspected, inventoried, and quarterly operational checks were performed in February/March, April/May, August, and November of 2014.	
4. A statement that survey instruments utilized for measuring radiation during environmental monitoring and analysis (field teams and radiological laboratories) were calibrated at intervals recommended by supplier of equipment (NUREG-0654/FEMA-REP-1, Evaluation Criterion H.10)	
If calibration occurred, the statement must include:	
a. Type of equipment	
b. Quantity of equipment	
c. Location of equipment	
d. Dates of calibration	
CDPH maintained 8 μ R meters and 21 GM meters for teams who may be sent to areas of potential contamination. These instruments are located at 1616 Capitol Avenue, Sacramento, CA and are sent out for annual calibrations. Instruments were calibrated in February, March, April and July 2014.	
5. A statement that direct-reading dosimetry has been tested for accuracy. All Direct-Reading Dosimeters (DRDs) shall be inspected for electrical leakage at least annually. CDV-138s must be inspected for electrical leakage quarterly. Dosimeters shall be recharged or replaced as necessary. (NUREG-0654/FEMA-REP-1, Evaluation Criterion H.10)	
This statement must include:	
a. Type of equipment	
b. Quantity of equipment	
c. Location of equipment	See enclosed hard copies.
d. Dates of calibration	See enclosed hard copies.
Cal OES:	
Maintained 303 Nuclear Power Preparedness (NPP) emergency response kits, distributed as follows:	
<ul style="list-style-type: none"> • 130 kits to California Highway Patrol (CHP) Border Division; • 50 kits to Caltrans - Orange County District 12 (D-12); • 25 kits to Caltrans – San Diego County District 11 (D-11); • 46 kits to California (CA) State Parks – Orange Coast District • 20 kits to Cal OES Southern Region; and • 32 kits for Cal OES Headquarters staff and/or spares. 	
<ul style="list-style-type: none"> • See enclosed hard copies regarding the dates of calibrations and quarterly operational checks/tests. 	

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- Each NPP Emergency Response Kit contains one SAIC PD-3i-S Dosimeter. These electronic dosimeters are tested for accuracy, calibrated and inspected for electrical leakage annually.
- Among other items contained in the NPP Emergency Response Kits, each kit contains one Radiation Detection Company Thermoluminescent dosimeter (TLD) badge. New TLDs were exchanged out in 2014 and distributed in May for wear period 6/01/14-05/31/15. The old TLDs for wear period 06/01/13-05/31/14 were collected and returned to the manufacturer.

CDPH:

CDPH maintains electronic dosimeters for use by staff that might be sent to areas where there is a potential for significant exposure. Ten Polimaster 1610B electronic dosimeters are maintained at 1616 Capitol Avenue, Sacramento, CA. These electronic dosimeters are sent out for calibration every two years. No quarterly leak testing required for these dosimeters.

6. A statement that sufficient quantities of potassium iodide (KI) are available for emergency workers, institutionalized individuals, and if the plan calls for it, the general public. (NUREG-0654/FEMA-REP-1, Evaluation Criterion J.10.e) If quantities of KI were not verified by FEMA during most recent biennial exercise:

This statement must include:

- | | |
|----------------------------|--|
| a. Amounts of KI available | |
| b. Storage locations | |
| c. Expiration date(s) | |

- Cal OES had a stockpile inventory of 50,000 IOSAT (130 mg) tablets for state emergency workers and California Men's Colony (CMC) workers and institutionalized populations.
- 40,000 tablets are located at the CMC Main Pharmacy. The emergency plan for the facility is to shelter the prisoners in place so a 5-day supply is provided for all staff and prisoners.
- Among other items contained in the NPP Emergency Response Kits maintained by Cal OES, each kit contains one IOSAT 14-tablet individually wrapped foil strip of KI.
- Cal OES supplies KI for CDPH's dosimetry kits. Sufficient quantities are available for CDPH.
- Cal OES maintains and inspects the KI inventory all labeled IOSAT 130 mg tablets; individually wrapped foil strips containing 14 tablets per strip. The expiration date is 04/2016.

Alert and Notification

Cal OES and CDPH do not own or operate any Community Alert Systems.

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Abbreviations and Acronyms

Cal OES	California Governor's Office of Emergency Services
CALWAS	California Warning System
CDPH	California Department of Public Health
CEC	California Energy Commission
CHP	California Highway Patrol
CMC	California Men's Colony
CNG	California National Guard
CSMR	California State Military Reserve
CSWC	California State Warning Center
CUEA	California Utilities Emergency Association
DCPP	Diablo Canyon Power Plant
DSS	California Department of Social Services
EMB	Environmental Management Branch
EMSA	Emergency Medical Services Authority
EPZ	Emergency Planning Zone
EOC	Emergency Operations Center
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Teams
GM	Geiger Mueller
HAB	Hostile Action-Based
HPs	Health Physicists
HQs	Headquarters
JIC	Joint Information Center
KI	Potassium Iodide
NAWAS	National Warning System
NERP	Nuclear Emergency Response Program
NPP	Nuclear Power Plant or Nuclear Power Preparedness
NRC	Nuclear Regulatory Commission
NUREG	Nuclear Regulation
ODAC	Offsite Dose Assessment Center
OES	Office of Emergency Services
ORO	Offsite Response Organization
PAZ	Protective Action Zone
PED	Personal Electronic Dosimeter
PIO	Public Information Officer
PPX	Plume Phase Exercise
PSAPS	Public Safety Answering Points
SREOC	Southern Regional Emergency Operations Center
RHB	Radiologic Health Branch
SAIC PD-3i-s	Science Applications International Corporation Self-Reading Electronic Dosimeter
SLO	San Luis Obispo
SONGS	San Onofre Nuclear Generating Station
State Parks	California State Parks
TLDs	Thermoluminescent Dosimeters
UDAC	Unified Dose Assessment Center