



FEMA

July 18, 2023

Mr. David R. Padfield
Director
Pennsylvania Emergency Management Agency (PEMA)
1310 Elmerton Avenue
Harrisburg, PA 17110

Dear Mr. Padfield:

This letter serves as a follow-up to our May 12, 2023, meeting regarding the 2022 Annual Letter of Certification submission.

Annual Plan Update

As discussed in our meeting, the FEMA Region 3 REP staff initiated a comprehensive review of the PEMA Annex E REP Plan for compliance with NUREG 0654 FEMA REP-1, Rev. 2, dated December 2019. The review has been completed. There are numerous areas of Annex E that require further action to update. Enclosed with this letter are the results of the comprehensive review to assist PEMA REP planners in completing the necessary updates to Annex E. In accordance with Pennsylvania Title 35, Section 7320, PEMA must complete an internal review of all associated plans from supporting agencies to ensure that these plans are also updated.

Outstanding Plan Issues

Plan Issues assessed during CY22 have not been corrected. Below are the outstanding Plan Issues that still require action (these are also referenced in the Federal Preparedness Coordinator's original ALC Response Letter to PEMA, dated March 26, 2023):

- From the April 26, 2022, Peach Bottom Atomic Power Station exercise:
 - Lancaster County Penn Manor School District, Plan Issue #46-22-1.5-P-03.
 - Lancaster County Solanco School District, Plan Issue #46-22-1.5-P-05.
 - York County South Eastern School District, Plan Issue #46-22-1.5-P-01.
 - Lancaster County Radiological Emergency Response Plan (the plan does not identify a location for a reception area or public monitoring and decontamination center) Plan Issue # 46-22-5.1-P-009.
- From the October 18, 2022, Susquehanna Steam Electric Station exercise:
 - Northumberland County Emergency Operations Center (EOC), Plan Issue # 63-22-1.2-P-005. Survey meters are out of calibration (we have received notification that compensatory measures are in place pending resolution of the Northumberland County equipment).

FEMA Evaluated Medical Services Drills

Current medical services drill scenarios submitted by PEMA do not allow for a response by

Emergency Medical Services (EMS) into the 10-mile plume exposure pathway emergency planning zone (EPZ). While the skills to properly treat and transport a contaminated patient by EMS in jurisdictions outside of the 10-mile plume exposure pathway have been demonstrated in FEMA evaluated drills, there has been no planning for those EMS teams that are within the 10-mile plume exposure pathway EPZ to recover a contaminated patient. This represents a gap in current planning assumptions and requires immediate attention. Beginning in CY 2024, we will require all future medical services drill scenarios to require EMS to respond to a contaminated patient that is inside the 10-mile EPZ, while wearing appropriate PPE to prevent unnecessary radiological exposures.

In summary, to satisfy the Annual Letter of Certification periodic requirements, as set forth in evaluation criteria contained in the Radiological Emergency Preparedness (REP) Program Manual Part IV, L, dated December 2019, PEMA must submit to FEMA:

1. An updated Annex E Commonwealth Radiological Emergency Response Plan that meets the intent of the planning standards contained in NUREG 0654 FEMA-REP 1, Rev. 2, to include associated plans from supporting agencies to ensure that these plans are also updated;
2. Plan updates from the local jurisdictions' assessed plan issues from previous REP exercises; and
3. An acknowledgment to the medical services drill scenario issue and submit updated plans for EMS response into the 10-mile plume exposure pathway EPZs for all 4 nuclear plants in Pennsylvania.

Please provide me with a corrective action plan and timetable for all items by August 18, 2023. The staff from the Technological Hazards Branch will assist in any way to accomplish these activities. If you have any questions, please contact the Technological Hazards Branch Chief, Thomas Scardino, at (215) 931-5546.

Sincerely,

MaryAnn Tierney
Regional Administrator
FEMA Region 3