

FEMA Annual Letter of Certification (ALC) Checklist

PURPOSE

To facilitate monitoring of Radiological Emergency Preparedness (REP) Program planning and preparedness, each state that has a REP Program submits an Annual Letter of Certification (ALC) to their Federal Emergency Management Agency (FEMA) Regional Administrator (RA). The ALC assists FEMA in making reasonable assurance findings and determinations regarding offsite radiological emergency plans/procedures and preparedness.

SCOPE

The ALC checklist assists state and FEMA Regional personnel with development, submission, and review of the ALCs and development of public education and information materials. Each element of the guide is supported by the appropriate regulation and/or guidance. The ALC must include assurances that all requisite activities have been undertaken or completed, as appropriate, by offsite response organizations (OROs).

GUIDANCE

The checklist assists state development of their ALC, ensuring they appropriately address important points. Each element of the guide is supported by the associated objective/capability target. The ALC may address more than one site within the state; FEMA personnel may verify information during staff assistance visits (SAVs). Regional personnel may send this review guide to their respective states as attachments to the November letter requesting the ALC.

Each November, the FEMA Regional Office submits a letter to the state requesting the ALC. The ALC submission for a given year is due by January 31st of the succeeding year. By the end of February, FEMA Regional personnel review the ALC and send to the state either an approval letter for each site or a letter requesting additional information for completing the review. FEMA Regional personnel will provide FEMA Headquarters with a copy of the state's ALC cover letter and the Region's final approval letter.

It is important to remember that while FEMA supports the use of the ALC Checklist, it is a guidance document.

The ALC submission for states that only have ingestion exposure pathway responsibilities need only address the sections denoted by asterisks (**).

**Department of Homeland Security
Federal Emergency Management Agency (FEMA)
Radiological Emergency Preparedness (REP) Program**

ANNUAL LETTER OF CERTIFICATION (ALC) CHECKLIST

Purpose: To provide guidance for review/evaluation of the ALC submitted by the state.

Scope: The ALC is reviewed to determine whether all information/documentation is included pursuant to laws and regulations and the FEMA REP Program Manual (RPM) guidance. Information contained in the ALC is compared with the offsite response organization's (ORO's) plans/procedures and the alert and notification system (ANS) evaluation report for consistency and accuracy. The ALC submission for states that only have ingestion exposure pathway responsibilities need only address the sections denoted by asterisks (**).

Basis:

- 44 CFR 350.5
- NUREG-0654/FEMA-REP-1, Rev. 2
- FEMA REP Program Manual

Confirm that the ALC includes the following items:




I. Update of plans/procedures and letters of agreement (LOAs)

****1.** A statement that ORO plans/procedures and LOAs have been reviewed for accuracy and completeness of information, and appropriate changes have been made. Updated LOAs and plan/procedure amendments must be submitted if not received previously. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion A.4)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. That ORO plans/procedures and LOAs have been reviewed for accuracy and completeness of information, and appropriate changes have been made.				N/A

II. 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. Public information materials may take various forms, including but not necessarily limited to, brochures, utility bill inserts, or calendars; all of these materials may be distributed in hardcopy and/or through electronic means (e.g., text message, email, websites, etc.). (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion G.1)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Dates of dissemination 				3.3
b. Means of dissemination 				
c. Identification of recipients 				
d. Copies of all public information materials, or reference to location where all can be viewed				

2. A statement that emergency information was disseminated to locations frequented by transient populations in the plume exposure pathway 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. This statement should include that yearly maintenance and updates on emergency public information signs located along rivers, parks, and other recreational areas were performed, and be updated and redistributed as necessary. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion G.1)


The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Dates of dissemination				3.3
b. Means of dissemination				
c. Identification of where information was distributed or posted				
d. Copies of all public information materials, or reference to location where all can be viewed				
e. Organizations responsible for distribution				
f. Identification of organizations responsible for maintenance/updates of public information materials				
g. Certification that parks and other recreational areas were not expanded, nor were new transient areas added to the plume exposure pathway EPZ. If expansions or additions were made, a statement must be provided that the appropriate additional signs were installed.				

3. A statement the 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 during an emergency. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion G.5)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held				3.3
b. Agencies/organizations invited/participated				
c. Organization(s) that sponsored the program				
d. Description of the program				

III. 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, Rev. 2, evaluation criterion O.1)

The statement must include the following for all training conducted:	Yes	No	N/A	Associated Capability Target(s)
a. All required organizations were offered training pursuant to ORO plans/procedures				All Capability Targets
b. Scope and purpose				
c. Dates training were held				
d. Number of participants				
e. Agencies/organizations represented				
f. Agencies/organizations invited, but who did not attend 				
g. Organization(s) that sponsored the training				

IV. Drills (Note: Only non-evaluated drills need to be reported in the ALC)

1. A statement that communication drills were conducted. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.4.f)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Monthly between the state and OROs within the plume exposure pathway EPZ				3.1
**b. Quarterly between state and Federal emergency response organizations, and states within the ingestion exposure pathway EPZ				
c. Annually between the nuclear power plant (NPP), state, and local emergency operations centers, and radiological field monitoring teams				
**d. Dates of communication drills				
**e. Participating organizations				


**2. A statement that environmental monitoring drills, which include direct radiation measurements in the environment, collection and analysis of all sample media (e.g., water, vegetation, soil, and air), and provisions for record keeping, that were performed during the period of this ALC. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.4.d) (Note: Environmental monitoring drills must involve personnel and resources for dose assessment.)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held				4.2, 4.3, 4.5, 4.6
b. Organizations that participated				


**3. A statement that lab drills were conducted, including an equipment list, calibrations, daily quality assurance/quality control (QA/QC). (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.4.c)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held				4.4
b. Organizations that participated				
c. Equipment list				
d. Calibrations				
e. Daily QA/QC was conducted				

4. A statement that non-evaluated medical services drills are conducted annually at each medical facilitated in the emergency plan. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.4.b)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held 				5.3
b. Facilities that participated				
c. Contamination control measures utilized				
d. Dosimetry				

****5.** A statement that ingestion pathway and post-plume phase drills are conducted biennially. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.4.e)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held 				1.6, 1.7, 4.3, 4.6
b. Organizations that participated				
c. Sample plan development				
d. Analysis of lab results from samples				
e. Assessment of the impact on foodstuffs and agricultural products				
f. Protective decisions for reentry, relocation, return, and reoccupancy				
g. Foodstuffs/crop embargo				
h. Dissemination of ingestion exposure pathway EPZ information to pre-determined individuals and business				
i. Assessment of emergency worker knowledge of ingestion exposure pathway EPZ procedures				
j. Identification of the individual authorized to make decisions in the ingestion exposure pathway EPZ				

****6.** A statement outlining the results and corrective actions from exercises and/or drills that were implemented and/or completed. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion N.1.b)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) held				N/A
b. A description of the process for tracking identified findings and any associated corrective actions from identification through resolution.				


V. 24-hour Staffing

****1.** A statement that sufficient trained and capable staff are available to maintain 24-hour capability for protracted activation. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion A.5)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. That sufficient trained and capable staff are available for 24-hour protracted activation				1.1

VI. Emergency Facilities and Equipment


****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 affects or has a direct impact on the emergency response operations performed in those facilities. (NUREG-0654/FEMA-REP-1, evaluation criteria G.2, H.6, J.11.d, J.13, K.4)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Verification that the facility has been evaluated or the expected date of the evaluation 				1.2, 5.1, 5.2


2. Certification that no substantial changes in structure or mission of previously reported facilities have occurred since initial evaluation. (NUREG-0654/FEMA-REP-1, evaluation criteria G.2, H.6, J.11.d, J.13, K.4)

The statement must affirm that:	Yes	No	N/A	Associated Capability Target(s)
a. There are no other new emergency response facilities or congregate care centers				1.2, 5.1, 5.2
b. None of the other current facilities or congregate care centers in the plans/procedures have undergone substantial changes				


3. A statement that inspection, inventory, and operational checks were made of survey instruments used for radiological monitoring (evacuee and emergency worker) and environmental monitoring and analysis (radiological field monitoring teams and radiological laboratory) per national standards or the manufacturer's instructions, whichever is more frequent. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criteria H.11, H.11.a, H.11.b)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Type of equipment 				2.2, 4.2, 4.3
b. Quantity of equipment				
c. Location of equipment				
d. Calibration frequency				
e. Dates of inspection/inventory check				


4. A statement that survey instruments used for measuring radiation during environmental monitoring and analysis (field teams and radiological laboratories) were calibrated per national standards or the manufacturer's instructions, whichever is more frequent. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criteria H.11, H.11.a, H.11.b)

If calibration occurred, the statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Type of equipment 				2.2, 4.2, 4.3
b. Quantity of equipment				
c. Location of equipment				
d. Dates of calibration				

5. A statement that direct reading dosimetry has been tested and maintained and inspected for electrical leakage per the national standards or manufacturer's instructions, whichever is more frequent. Statement should include information regarding the recharging and replacement of dosimetry as necessary. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion H.11, H.11.a, H.11.b)


The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Type of equipment 				2.2
b. Quantity of equipment				
c. Location of equipment				
d. Dates of calibration				
e. Recharging of dosimetry				
f. Replacement of dosimetry				
g. Dates of annual DRD electrical leakage testing				
h. Dates of quarterly CDV-138 electrical leakage testing				

6. A statement that sufficient quantities of potassium iodide (KI) are available for emergency worker, institutionalized individuals, and if the plan calls for it, the general public. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion J.11.b)

If quantities of KI were not verified by FEMA during the most recent biennial exercise, the statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Amounts of KI available 				1.5
b. Storage locations				
c. Expiration date(s)				



VII. Responsibility for the Planning Effort

****** 1. A statement indicating that an annual review has been conducted. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion P.4)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Date(s) the review occurred				N/A
b. Signature page				
c. Plans/procedures, maps, charts,  agreements were reviewed at least annually to verify accuracy and completeness				

VIII. Alert and Notification

1. A statement that a routine testing program was completed pursuant to the ANS evaluation report. (NUREG-0654/FEMA-REP-1, Rev. 2, evaluation criterion F.3 and RPM Part V: REP Program Alert and Notification System Guidance)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Types of tests conducted in accordance with the established schedule 				3.2
b. Dates of tests 				

2. A statement that the availability/reliability of the system is maintained pursuant to the ANS evaluation report. (RPM Part V: REP Program Alert and Notification System Guidance)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Description of any failures that were detected and how they were mitigated, tracked, trended.				3.2

3. A statement that the maintenance of the system is being conducted pursuant to the ANS evaluation report. (RPM Part V: REP Program Alert and Notification System Guidance)

The statement must include:	Yes	No	N/A	Associated Capability Target(s)
a. Description of any corrective maintenance that was conducted.				3.2

4. When applicable, a statement that the verification process, as described in the ANS evaluation report, validates that the system or approach meets the design objectives. (RPM Part V: REP Program Alert and Notification System Guidance)

5. A statement (if applicable) for exception areas requiring alert and notification methods (e.g., aircraft and/or mobile route alerting and notification) that routes, alerting methods, and resources remain unchanged. If changes did occur, the ANS evaluation report must be updated to reflect the modifications. (RPM Part V: REP Program Alert and Notification System Guidance)

6. A statement that the system continues to meet the needs of population it was designed to alert/notify (i.e., the characterization of the population and the demographics that is described in the ANS evaluation report). (RPM Part V: REP Program Alert and Notification System Guidance)