

# **FEMA Region VII Radiological Emergency Preparedness Annual Letter of Certification Improvement Plan**

**State: Iowa**  
**ALC Year: 2020**

## **Item #1**

**Description:** Per the State, no drills or exercises were conducted with QCGS to test communications effectiveness with QCGS, States of Iowa and Illinois, Clinton and Scott County EOCs, and the field assessment teams. The State did, however, state that communication equipment had been “consistently operational, with no decrease in effectiveness”.

**Reference(s):** NUREG-0654/FEMA-REP-1, Planning Standard N.2.a: “Communications between the nuclear facility, State and local emergency operations centers, and field assessment teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages.” While Iowa also states that the communications systems have been consistently operational, Planning Standard N also states: “OROs test communications with organizations that have roles in the emergency response at the minimum intervals specified in the Evaluation Criterion. These tests include more than just assurance that the communications hardware is functioning properly.” These drills should include transmission and acknowledgement of information similar to information actually transmitted during a radiological event to meet the intent of the planning standard.

**Corrective Action(s):** **Iowa intends to demonstrate a communications test between the Quad Cities Generating Station during a drill with the Iowa State Emergency Operations Center, Iowa Fields Teams and Scott and Clinton Counties to demonstrate the capability to transmit and acknowledge communications.**

**Responsible Agency(s) and POC:** **Iowa Homeland Security and Emergency Management. POC- Kathy Stodola – [kathy.stodola@iowa.gov](mailto:kathy.stodola@iowa.gov)**

**Expected Completion Date:** **December 31, 2021**

## **Item #2**

**Description:** Per the State, in the QCGS portion of the submission, radiological emergency training was not held for the Forward Command Post or any Local entity other than River Bend Transit/First Student (school) due to COVID-19 and the Governor’s Public Health Emergency Proclamation. Per the state plan, the training matrix identifies several trainings that should be provided to these entities on an annual basis. The ALC submission does not identify any virtual training offerings.

**Reference(s):** NUREG-0654/FEMA-REP-1, Planning Standard O.5: “Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.” While the entity does not necessarily HAVE to attend the training, it must still be offered. We understand that training was a difficult piece to accomplish due to the COVID environment, and that some training may be difficult to conduct virtually due to the practical nature of the content.

**Corrective Action(s):** Iowa intends to offer training to the offsite response organizations during 2021.

**Responsible Agency(s) and POC:** Iowa Homeland Security and Emergency Management. POC- Kathy Stodola – kathy.stodola@iowa.gov

**Expected Completion Date:** December 31, 2021

### **Item #3**

**Description:** The ALC indicated, in section 2 of Emergency Facilities and Equipment, there are “no new emergency response facilities, communications systems, or congregate care facilities”. However, in a later section of the document indicated that on September 8, 2020, Exelon implemented an “enhancement” to the notification system used by QCGS, known as the Emergency Offsite Notification System (EONS). EONS provides audible warning, electronic and printed messages for QCGS NARS messages to the initial warning points at the Iowa State Emergency Operations Center, Iowa State Patrol Communications, and Scott and Clinton County Emergency Communications Systems. This change to the communication system is not currently noted in the state or county plans. This change is only noted in the QCGS portion of the ALC, but not in the Iowa State portion, and this was likely a negligible oversight. Upon reaching out to the state on 10 Feb 2020, they identified EONS as an enhancement of an existing system and that standard operating procedures (SOPs) for the state and risk counties would need to be updated.

**Reference(s):** NUREG-0654/FEMA-REP-1, Part III; 44 CFR 350.5 (a), 350.7: Changes to plans or procedures must be provided to FEMA for review. While this particular change may not involve a change to the state or county radiological emergency response plan (RERP), it would appear to require a change to the procedures which are considered an annex or attachment to those plans. The state acknowledged a need for a change in procedures on 10 Feb 2020.

**Corrective Action(s):** Operational procedures will be updated for the Iowa Department of Public Safety- Iowa State Patrol Communications and Scott and Clinton County Communications Centers to include the EONS enhancement.

**Responsible Agency(s) and POC:** Iowa Homeland Security and Emergency Management. POC- Kathy Stodola – kathy.stodola@iowa.gov

**Expected Completion Date:** April 30, 2021