

State of California 2020 Annual Letter of Certification Report



STATE OF CALIFORNIA 2020 ALC REPORT

Department of Homeland Security Federal Emergency Management Agency Radiological Emergency Preparedness Program	
ANNUAL LETTER OF CERTIFICATION JANUARY 26, 2021	
Purpose: To guide the review and evaluation of the Annual Letter of Certification (ALC) submitted by the States for compliance with periodic requirements.	
Scope: The State ALC is reviewed to determine whether all information/documentation is included according 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: <ul style="list-style-type: none">✓ 44 CFR part 350.5 (Planning Standards)✓ NUREG-0654/FEMA-REP-1✓ FEMA REP Program Manual
Confirm that the ALC includes the following items:	
Update of Plans/Procedures and Letters of Agreement	
1. 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.	
California Governor's Office of Emergency Services (Cal OES): <ul style="list-style-type: none">• The California Nuclear Power Plant (NPP) Emergency Response Plan was reviewed for accuracy and completeness of information in 2020. Due to COVID-19, non-essential changes to the plan have been deferred until 2021.	
California Department of Public Health (CDPH): <ul style="list-style-type: none">• The Nuclear Emergency Response Program (NERP) within CDPH reviewed existing documentation and revised the following procedures, see enclosed electronic copies:<ul style="list-style-type: none">○ E-03 Unified Dose Assessment Center (UDAC) Technical Offsite Support Team○ E-05 Joint Information Center (JIC) Diablo Canyon○ E-11 CDPH Emergency Worker Radiation Protection & Monitoring	
San Luis Obispo (SLO) County: <ul style="list-style-type: none">• All SLO County/Cities Nuclear Response Plans and Standard Operating Procedures (SOPs) were reviewed for accuracy and completeness of information in 2020. Due to COVID-19, non-essential changes to plans and SOPs have been deferred until 2021.	

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DCPP:

- Updated the following Letters of Agreement (LOAs) during 2020. Enclosed are electronic copies.
 1. French Hospital Medical Center (FHMC)
 2. Marian Regional Medical Center (MRMC)
 3. Sierra Vista Regional Medical Center (SVRMC)
 4. San Luis Ambulance, Inc. (SLA)
 5. Cambria Community Healthcare District (CCHD)
 6. PGE helicopter Operations
 7. California Highway Patrol (CHP) – Coastal Division
 8. California Highway Patrol (CHP) – Golden Gate Division
 9. Cal Fire
 10. United States Coast Guard (USCG)
 11. DOE/REACTS

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:

- | | |
|---|--|
| a. Dates of dissemination | |
| b. Means of dissemination | |
| c. Identification of recipients | |
| d. Copies of all public information materials | |

SLO County/ DCPP:

- An emergency preparedness information calendar was distributed throughout the DCPP Emergency Planning Zone (EPZ) in November of 2020 as the primary means for providing updated emergency preparedness information to the public on an annual basis. This calendar is a handbook for planning, agricultural information, information for those with disabilities and medical needs, and protective actions. The calendar also contains a voucher for potassium iodide (KI) and postage paid Evacuation Assistance card for those with disabilities and medical needs. Enclosed is an electronic copy.
- An internet website www.ReadySLO.org was maintained to provide general and NPP emergency planning information including all the information sent out by hardcopy to residents within the EPZ.
- A Twitter account @slocountyoes and Facebook page www.facebook.com/SloCountyOES were maintained to provide information on general emergency planning and NPP information and to provide information to the public during an emergency. These accounts were also utilized to provide information to the public during the siren test on 8/22/20.

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- A significant advertising campaign and outreach effort were conducted by PG&E and SLO County with local media outlets throughout 2020. The ads provided information about the Early Warning System (EWS) sirens and how to prepare, respond, and be notified of an emergency. See electronic file of 2020 Ad Campaigns for copies and dates of all public information materials.
- A booklet titled "Nuclear Power Plant Emergency Planning for Schools and Childcare Providers" was sent to private schools and daycare centers within the EPZ in May of 2020. It was accompanied by an informational card to return to the SLO County Office of Emergency Services (OES). Enclosed is an electronic copy.
- During the siren test on 8/22/20, Caltrans advertised siren test information on local freeway signs. County Public Works Department also provided signage at Avila Beach and Montana De Oro State Park. Port San Luis Harbor District provided signage at the port.
- DCPD maintained a toll-free number (800) 743-5000 and customer services general reference website (https://www.pge.com/en_US/safety/how-the-system-works/diablo-canyon-power-plant/about-the-diablo-canyon-power-plant.page) which could be activated and used during emergency response to a DCPD Event.
- The County also maintained an emergency planning telephone line (805) 543-2444 to provide preparedness information to SLO County residents, which could be activated and used during a response to a DCPD event.
- An evacuation assistance list program focusing on populations with disabilities and medical needs was maintained by SLO County OES. This involved sending a letter, a "No Assistance Required" placard (NAR), and a FEMA brochure titled "Preparing for Disaster for People with Disabilities and other Special Needs" to persons who signed up for the evacuation assistance list. This program will enable individuals with disabilities and medical needs to receive evacuation assistance or notify emergency responders if they have safely evacuated following an emergency.
- Local government representatives surrounding DCPD responded to public inquiries about nuclear power preparedness on a case-by-case basis. Questions have included: 1) how the public is notified of a nuclear power plant emergency; 2) what the public should do when notified; 3) where the public would go; 4) how special needs groups should obtain transportation; 5) how radiation affects the human body; 6) concerns relating to the distribution of KI and how they may obtain a supply; 7) How the siren system works; and 8) what the public can do to be more prepared during an emergency.

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

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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 the distribution	
<p>SLO County/DCPP:</p> <ul style="list-style-type: none"> Informational posters for the 8/22/20 siren test were hand-delivered to local hotels, motels, grocery stores, parks and beaches, and the airport to target our transient populations before the annual August Siren Test. Siren test postcards were also mailed to businesses and residences within the emergency planning zone before the 8/22/20 test. Enclosed is an electronic copy. The 2020 emergency preparedness information calendar was distributed to County offices throughout the DCPP EPZ. Please see enclosures for electronic copies of these materials and specific information on public information ad campaigns in local publications located in areas frequented by transient populations. The ads featured information on the EWS sirens, how to prepare for emergencies, and the 8/22/20 Siren Test. <p>State Parks:</p> <ul style="list-style-type: none"> State Parks Oceano Dunes District and SLO Coast District disseminated emergency information to locations frequented by transient populations in the EPZ throughout 2020. Via decals and signs distributed or posted at campgrounds and trailheads. State Parks is responsible for distribution and SLO County OES is responsible for any updates to this emergency information. Enclosed are electronic copies. Continues to coordinate with SLO County OES to update an inventory of siren information. 	
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.	

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b. Identifies organizations responsible for maintenance/ update.	
SLO County/DCPP: <ul style="list-style-type: none"> The agency responsible for the recreational area conducts sign maintenance and coordinates any replacement needed with the SLO County OES. SLO County OES is responsible for any updates. 	
State Parks: <ul style="list-style-type: none"> Parks and recreational areas were not expanded; furthermore, no new transient areas were added. 	
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	
CDPH: <ul style="list-style-type: none"> Reviewed the informational ingestion pathway brochure titled "Nuclear Power Plant Emergency Information for Agriculture" for completeness and accuracy; no updates were necessary. An electronic copy of the brochure is enclosed. 	
SLO County/DCPP: <ul style="list-style-type: none"> Information regarding the ingestion pathway was included in the 2020 emergency preparedness calendar distributed throughout the EPZ. Agricultural emergency planning information was also made available on the SLO County OES website, www.ReadySLO.org Distributed the informational ingestion pathway brochure titled "Nuclear Power Plant Emergency Information for Agriculture" in June of 2020 to farmers, ranchers, and distributors within SLO County. The brochure was also continued to be made available locally by the SLO County OES, Department of Agriculture Weights and Measures, and surrounding counties. 	
5. A statement that an annual media program was conducted to acquaint news media with emergency plans/procedures, information concerning radiation, and points of contact for the release of public information in an 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 the program	
d. Description of program	
NOTE: In instances of poor attendance, instead of a meeting, a statement that program materials covering requisite topics were mailed to media representatives must be provided.	
SLO County/DCPP:	

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- In conjunction with PG&E, packets containing materials covering the county's emergency plans/procedures, information concerning radiation, the EWS sirens, agricultural information, and public information during an emergency were sent to all local print, television, and radio news media outlets in December 2020.
- On December 17, 2020, local news media were invited to participate in a virtual training/tour of DCCP to acquaint news media with the power plant, plans/procedures, radiation, and public information during a nuclear power plant emergency. The following media chose to participate this year: KEYT News Channel 3, and KCOY.

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)

The statement must include the following for all training conducted:

a. All required organizations were offered training according to ORO plans/procedures	
b. Scope and purpose	
c. Dates training was held	
d. Number of participants	
e. Agencies/organizations represented	
f. Agencies/organizations invited, but who did not attend.	
g. Organizations that sponsored the training.	

Cal OES:

- Training of personnel who implement radiological emergency response plans/procedures was accomplished. Training for NPP 101 was initially scheduled for 6/3/2020 and 6/10/2020. This training was later rescheduled to 5/19/2021 due to the COVID-19 Pandemic and the resulting health and safety protocols. Cal OES will conduct NPP 101 virtual training on 5/19/2021. Enclosed is an electronic copy of the Cal OES 2020 Radiological Emergency Preparedness Training information.

CDPH:

- A substantial amount of training occurred in 2020 to maintain response capabilities. Enclosed is an electronic copy of the CDPH 2020 Health Physics Training Related to NPP Emergency Response document with details. The table includes both required emergency response organization-specific training and general health physics training which may be applicable during emergency response activities.

SLO County/DCCP:

- 870 hours of training were conducted. Enclosed is an electronic copy of the training record summary with details. Representatives from utilities and

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<p>state and local governments participated in training sessions covering various aspects of the training categories identified in NUREG-0654, including accident assessment; decision making; emergency worker roles; local support services; public information, and radiological monitoring; medical. SLO County OES and DCPD Emergency Planning conducted training sessions with local public safety agencies and emergency workers. Due to the activation of the County's response organization for COVID-19 and State of California guidelines regarding gatherings, the number of training hours is lower for 2020 than in previous years.</p> <p>CHP:</p> <ul style="list-style-type: none"> • Three CHP SLO area employees completed National Incident Management System (Module IS 701a NIMS Multi-Agency Coordination System; IS 703a- NIMS Resource Management; IS 704 – NIMS Communication and Information Management) on 10/6/2020. • Twenty-seven CHP SLO area employees completed Hazardous Materials First Responder Operations (FRO) training sponsored by CHP on 8/5 – 9/28/2020, as part of their annual certification. 	
<p>Drills</p> <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>	
<p>1. A statement that communication drills (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2.a) were conducted:</p>	
<p>a. Monthly between the State and OROs within plume EPZ</p>	<p>Cal OES:</p> <ul style="list-style-type: none"> • California State Warning Center (CSWC) represents the State in the monthly communication drills initiated by the utilities. <p>SLO County:</p> <ul style="list-style-type: none"> • Monthly communication test to local governments within EPZ January 2, February 6, March 5, April 2, May 7, June 4, July 2, August 6, September 3, October 1, November 5, and December 3, 2020. • Monthly communication drills were conducted with the SLO County Sheriff's Department and California State Warning

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	<p>Center (CSWC). These organizations serve as the offsite notification points for a declared emergency at DCPD.</p> <ul style="list-style-type: none"> • Communications/ENF Application Drills were performed monthly between DCPD, the SHWC (Sheriff's Watch Commander), and the State Warning center on January 29, February 12, March 12, April 11, May 7, June 18, July 24, August 19, September 17, October 9, November 5, and December 10. • Communication drills were conducted between NPP, State, and local emergency operations centers and radiological field monitoring teams on 3/5/2020 and 3/12/2020.
b. Quarterly between State and Federal emergency response organizations and states within the ingestion pathway EPZ	<p>SLO County:</p> <ul style="list-style-type: none"> • Accomplished via CALWAS tests conducted daily and in actual use.
c. Annually between NPP, State, and local emergency operations centers, and radiological field monitoring teams	<p>SLO County:</p> <ul style="list-style-type: none"> • Communication drills were conducted annually between NPP, State, and local emergency operations centers and field monitoring teams.
d. Dates of communication drills and participating organizations	<p>SLO County:</p> <ul style="list-style-type: none"> • Refer to item c. (above) and the 2020 DCPD reports for other dates communication drills and participating organizations.
<p>2. A statement that radiological monitoring drills related to plume collection of particulate and radioiodine samples and radiation measurements and if applicable any Ingestion Pathway drills that were performed during the period of this ALC. (NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2.d)</p>	

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This statement must include:	
a. Dates of monitoring drills	
b. Organizations that participated	
NOTE: These drills must involve personnel and resources for field team coordination and field teams.	
SLO County/DCPP: <ul style="list-style-type: none"> 3/5/20: DCPD Full Scope Drill including UDAC, FMTs, OEL 3/12/20: DCPD Full Scope Drill including UDAC, FMTs, OEL The preceding drills included the collection and analysis of samples by Field Monitoring Teams (FMTs) with provisions for communication and record-keeping. Due to COVID-19 in-person gathering limitations, the remainder of full scope drills for the 2020 calendar year were canceled. 	
3. A statement that health physics drills were conducted semiannually with licensees that included a response to, and analyses of, simulated elevated airborne and liquid samples and direct radiation measurements in the 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)	
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.	
CDPH: <ul style="list-style-type: none"> Due to the COVID-19 Pandemic and the resulting health and safety protocols, CDPH did not travel to San Louis Obispo for drills in 2020. 	
SLO County/DCPP: <ul style="list-style-type: none"> 3/5/20: DCPD Full Scope Drill including UDAC, FMTs, OEL 3/12/20: DCPD Full Scope Drill including UDAC, FMTs, OEL The preceding drills included a response to, and analyses of, simulated elevated airborne and liquid samples and directed radiation measurements in the environment by Unified Dose Assessment Center staff. Due to COVID-19 in-person gathering limitations, the remainder of full scope drills for the 2020 calendar year were canceled. 	
24-Hour Staffing (NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1.e)	
<ul style="list-style-type: none"> A statement that sufficient trained and capable staff is available to maintain a 24-hour capability for protracted activation. 	
Utility and Offsite Response Organization (OROs) staff is available 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)	

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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	
<p>Cal OES:</p> <ul style="list-style-type: none"> • Cal OES has not added any new facilities or substantial changes in structure or mission since evaluation. The Evaluation of the California SREOC was conducted on October 7, 2020, using the January 2016 REP Program Manual; specifically, the demonstration criteria. <ul style="list-style-type: none"> ○ The formal documentation of this evaluation during an activation for wildfires and a pandemic public health emergency will be summarized within the DCPD biennial plume phase after action report. ○ This report will be issued in late 2021 and provided to the NRC for publication on ADAMS. <p>CDPH:</p> <ul style="list-style-type: none"> • CDPH has not added any new facilities or substantial changes in structure or mission since evaluation. The Evaluation of the California Department of Public Health, Medical and Health Coordination Center (DOC) was conducted on October 7, 2020, using the January 2016 REP Program Manual; specifically, the demonstration criteria. <ul style="list-style-type: none"> ○ The formal documentation of this evaluation during an activation for wildfires and a pandemic public health emergency will be summarized within the DCPD biennial plume phase after action report. ○ This report will be issued in late 2021 and provided to the NRC for publication on ADAMS. <p>SLO County/DCPD:</p> <ul style="list-style-type: none"> • There has been no identification of facilities that are new or have had substantial changes in structure or mission since evaluation. 	
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	

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facilities in the plans/procedures has undergone substantial changes	
Utility and OROs have had no substantial changes in the structure or mission of previously reported facilities. None of the other current facilities or communications in the plans/procedures have undergone substantial changes since evaluation.	
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) 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: <ul style="list-style-type: none"> Maintained, at a minimum, 10 μR meters and 18 GM meters for teams who may be sent to perform radiological monitoring. These instruments are located at 1725 23rd Street Suite 110, Sacramento, CA, and are sent out for annual calibrations. Quarterly inspection, inventory, and operational checks are performed on all viable instruments and upon each use. Instruments were inspected, inventoried, and quarterly operational checks were performed in February/March, May/June, August/September, and November/December of 2020. 	
SLO County/DCPP: <ul style="list-style-type: none"> Per the Concept of Operations (COO) agreement with PG&E/Diablo Canyon, PG&E is responsible for equipment inspection and calibration. DCPP maintained portal monitoring equipment (26 total), field monitoring team kit instruments and supplies, and environmental monitoring and analysis equipment in accordance with emergency response plans and procedures. Enclosed is an electronic copy of the DCPP inventory checklist, portal monitor quarterly gamma spectrum analyses, and portal monitor annual verification checklists. San Luis Obispo County has 88 Ludlums for radiation monitoring. 22 Ludlums are located in the County General Services Logistics Supply Building at 1475 Kansas Avenue in San Luis Obispo. The other 66 Ludlums are split between three decontamination trailers, adjacent to the County EOC. The Ludlums were operationally checked on 3/4/2020, 8/25/2020, and 11/4/2020. Please see the enclosed spreadsheet for certificates of calibration. 	

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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 the 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 at a minimum of 10 μ R meters and 18 GM meters for teams who may be sent to perform radiological monitoring. These instruments are located at 1725 23rd Street Suite 110, Sacramento, CA, and are sent out for annual calibrations. Quarterly inspection, inventory, and operational checks are performed on all viable instruments and upon each use. Instruments were inspected, inventoried, and quarterly operational checks were performed in February/March, May/June, August/September, and November/December of 2019. Calibration was performed in March and December 2020.

CHP:

- CHP has two portable radiation instruments, Victoreen 450CHP. Calibration occurred on 1/2 and 8/20. The equipment is located at 675 California Blvd. in San Luis Obispo, CA 93401.

SLO/DCPP:

- For 2020, the survey instruments used for radiation monitoring during environmental monitoring and analysis (field teams and radiological laboratories) were calibrated on 12-month intervals, as recommended by the equipment manufacturer or ANSI industry guidelines. The transition from older model instruments to the newer generation was completed midway through 2018. Additionally, the RadEye GX, has the capability of being calibrated to be used as both operate as either a dose-rate or count-rate instrument. Hence, they are listed in both categories.
- 4.a. Two types of equipment/instruments were used at off-site locations and in field monitoring kits to measure radiation.
 - For radiation level monitoring (dose-rate):
 - RadEye G (internal GM tube)
 - RadEye GX (external interchangeable GM probe)
 - For contamination-level monitoring (count-rate):
 - RadEye GX (external interchangeable GM probe)
- 4.b. Overall quantities are:
 - RadEye G - 20 assigned to EP (a subset of all 159 RadEyes at DCPP).
 - RadEye GX - 68 assigned to EP (a subset of all 98 RadEye GX's at DCPP).

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- 4.c. Locations where the instruments were stationed (entire list):
 - Emergency Operations Facility
 - SLO County Hazardous response vehicle
 - On-site field monitoring kits
 - TSC / OSC (Technical Support Center/Operations Support Center)
 - OEL (Offsite Environmental Laboratory)
 - French Hospital
 - Marian Hospital
 - Sierra Vista Hospital
 - Community Center Decon
 - Alt OSC/TSC
- 4.d. When referencing the calibration logs there will occasionally be gaps between calibrations due to transport time, shelf-time, and lack of need prior to calibration. Complete inventories are performed of the kits and/or locations to ensure the instruments are within their calibration cycles. DCPD Radiation Protection (RP) Section maintains a database of all RP instrumentation which includes everyone assigned to the EP Program support. Finally, 4th Quarter inventories of instruments and equipment staged for EP is currently underway and will involve additional instrument replacements, see enclosed electronic copies of documentation.

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	
d. Dates of calibration	

Cal OES:

- The Radiological Preparedness Unit maintained 100 kits for the Nuclear Power Plant Program and distributed 20 kits to Cal OES Southern Region.
- Each NPP Emergency Response Kit contains one Science Applications International Corporation Self-Reading Electronic Dosimeter (SAIC) PD-3i-s Dosimeter. These electronic dosimeters are tested for accuracy, calibrated, and inspected for electrical leakage bi-annually per the manufacturer's specifications, see enclosed electronic copies. Quarterly inspections were completed on 3/4, 6/17, 9/25, and 12/18.
- 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 2020 and were distributed in May for the wear period 6/1/20- 5/31/21. The old TLDs for the

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wear period 6/1/19- 5/31/20 were collected and returned to the manufacturer.

CDPH:

- Maintained electronic dosimeters for use by staff that might be sent to areas where there is a potential for exposure from a radiological event. 20 Polimaster 1610B electronic dosimeters are maintained at 1725 23rd Street Suite 110, Sacramento, CA. The manufacturer Polimaster "confirms that there are no manufacturer's requirements relating to periodic calibrations of the radiation dosimeter model PM1610". An electronic copy of the Polimaster calibration certification is enclosed.

SLO County/DCPP:

- PG&E supplies 1,700 Personal Electronic Dosimeters (PEDs) for offsite response organizations.
- PG&E performs calibration checks on all PEDs (in 5 batches) annually for distribution by SLO County OES to emergency workers.
- PG&E supplies 3,633 Thermoluminescent Dosimeters (TLDs) for offsite response organizations which are distributed annually by SLO County OES inside and outside the DCPD EPZ.
- The PEDs are manufactured by Thermo Electron Corporation, and the TLDs are manufactured by Radiation Detection Company. See enclosed electronic copy of the spreadsheet for quantity, location, and dates of calibration for equipment.

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 the most recent biennial exercise:

This statement must include:

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

CalOES:

- Cal OES stockpiled an inventory of 38,612 IOSAT (130 mg) tablets for state emergency workers, and California Men's Colony (CMC) workers, and institutionalized populations. The KI is located in Building B of Cal OES HQ.
- 33,600 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.
- Cal OES supplies KI for CDPH's dosimetry kits. Sufficient quantities are available for CDPH.

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- 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 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 December 2021 (Lot # YHJ14).

SLO County:

- SLO County stores sufficient amounts of KI for all emergency workers with a current KI expiration date of October 2029.
- KI for the general public continues to be made available on a pre-distribution basis through the San Luis Obispo County Public Health Department.
- SLO County OES has approximately 4,500 doses of KI stored for emergency workers.
- Of that total, 3,633 are located in emergency worker exposure control kits at pre-designated agencies and county departments. The remainder of the KI for emergency workers is stored at the County EOC.
- See the enclosed electronic copy of the spreadsheet for Emergency Worker KI locations.
- KI for incarcerated and institutionalized persons is maintained separately.

Alert and Notification

1. A statement that a routine siren testing program was completed according to the design report. (REP Program Manual Section V, Part A)

This statement must include:

- | | |
|--|--|
| a. Type of tests conducted following an established schedule | |
| b. Dates of tests | |
| c. Number of sirens tested operable and inoperable | |

DCPP:

- Silent siren tests were conducted by PG&E once every two weeks, growl tests were conducted quarterly (January 14 and 15, April 7 and 8, July 28 and 29, October 6 and 7). The annual audible siren test was conducted on Saturday, August 22, 2020, with two separate activations at noon and again at 12:30 p.m. All 131 sirens were successfully sounded and tested. The DCPPEWS was tested in accordance with federal guidelines and NUREG-0654 Appendix E.

2. Analysis of percentage of operable sirens. (REP Program Manual Section V, Part A)

This must be at least 90 percent and include

- | | |
|---|--|
| a. Computation of siren operability (percentage of sirens operable) for the immediately preceding | |
|---|--|

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calendar year. This is determined by a simple average of all regularly conducted tests employed as part of the testing program (e.g., silent, growl, full cycle). Calculations will be checked by a specialist to substantiate results.	
b. Description (or calculations) of the method used to calculate siren operability percentage	
SLO County: <ul style="list-style-type: none"> Analysis of percentage of operable sirens. (REP Program Manual Section V, Part A) All 2020 siren tests were completed in coordination with SLO County and resulted in a 99.93% reliability average (as of 12/22/2020) for the year. The specific method used for calculation: $(4189 \text{ of successful siren tests in previous 4 quarters}) \times 100\% \div (\text{Total number of siren tests } (4192) \text{ in previous 4 quarters}) = 99.93\%$ 	
3. A statement (if applicable) that a maintenance program for residential tone alert radios has been properly implemented. (REP Program Manual Section V, Part A)	
This statement must specify the type and frequency of residential tone alert radio (as part of primary ANS) tests conducted and include assurances that:	
a. Registers, containing a list of addresses where equipment is located, have been updated to reflect additions or changes	
b. Registers include individuals who have refused this equipment	
c. Equipment operating checks have been completed or offered to residents with this equipment	
d. Tests identifying frequency were conducted offering the public a means to self-test its receivers	
e. Necessary written guidance was provided that addressed:	
1. General usage	
2. Self-testing frequency and method	
3. Suggested placement to facilitate efficient use	
4. Maintenance program details	
5. Telephone numbers for repair or replacement	
SLO County: <ul style="list-style-type: none"> No residential tone alert program exists in SLO County. However, tone alert radios are in all public schools within the EPZ, hospitals, and other miscellaneous facilities. These radios are tested monthly. 	
4. A statement specifying the type and frequency of routine testing of all applicable alerting systems, other than sirens and tone alert radios. This testing must be performed at least annually. (REP Program Manual Section V, Part A)	

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Alerting methods may include:	
a. Mobile route alerting and notification	
b. Aircraft route alerting and notification	
c. Institutional alerting mechanisms in schools, hospitals, nursing homes, etc.	
d. Automatic telephone dialers/switching equipment	
e. Modulated power lines	
f. Type and frequency of residential tone alert radio (as part of primary ANS) tests conducted	
<p>SLO County:</p> <ul style="list-style-type: none"> Accomplished through CALWAS daily/monthly testing and actual use. Monthly communication tests of various telephone systems to local governments within EPZ including Public Safety Answering Points (PSAPS). Monthly communication drills are conducted with the SLO County Sheriff's Department and California State Warning Center (CSWC). These organizations serve as the offsite notification points for a declared emergency at DCP. A maintenance program for institutional alerting methods has been implemented. Registers with equipment locations for ORO coordinated systems are on file, including the Brown net system. The Brown telephone systems are tested monthly as methods of alerting other than sirens and tone alert radios. A list of facilities such as school districts with Brown telephone systems is maintained continuously through SLO County OES. A maintenance agreement is also in place between the utility and the lead ORO (County) on testing and contact information related to any problems with the above noted Brown phone system. Hospital system maintenance and testing are coordinated through Public Health and the County's emergency medical dispatch system, as well as individual hospitals. The emergency medical dispatch system (MedCom) also maintains contact with and between ambulances and hospitals via both radio and software communications system. 	
5. A statement (if applicable) that a maintenance program for alerting systems other than sirens and tone alert radios (e.g., radios in schools/hospitals) has been properly implemented. (REP Program Manual Section V, Part A)	
This statement must include assurances that:	
a. Registers, containing a list of addresses where equipment is located, have been updated to reflect additions or changes	
b. Registers include organizations that have refused this equipment or information	
c. Equipment operating checks have been completed or offered	
d. Necessary written guidance was provided that addressed:	
1. General usage	
2. Suggested placement to facilitate efficient use	

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3. Maintenance program details	
4. Telephone numbers for repair or replacement	
SLO County: <ul style="list-style-type: none"> Telephone communication systems are tested monthly as methods of alerting other than sirens and tone alert radios. A list of facilities such as school districts with emergency telephone communications systems is maintained continuously through SLO County OES. Other than tone alert radios, hospitals and schools maintain and test their radio systems. 	
6. A statement (if applicable) for exception areas requiring alert and notification methods, other than sirens and tone alert radios (e.g., aircraft and/or mobile route alerting and notification) that routes, alerting methods, and resources remain unchanged. If changes did occur, the design report must be updated to reflect modifications.	
SLO County: <ul style="list-style-type: none"> Route alerting by emergency workers can be implemented should our primary notification systems fail. Route Alerting supplies and maps are stored at various locations throughout the Emergency Planning Zone. A spreadsheet of locations is enclosed. Route alerting is a component of annual training for emergency workers. 	
7. A statement that siren sound pressure/population density requirements have been met. (REP Program Manual Section V, Part A)	
This statement must include assurances that:	
a. In areas where siren sound pressure level is less than 60 dBc, the population remains below 2,000 persons per square mile	
b. If the population has increased to the level of 2000 persons per square mile, siren sound pressure levels must be increased and the design report modified	
SLO County: <ul style="list-style-type: none"> All EWS coverage requirements have been met as described in Revision 4 of the FEMA approved ANS design report. The approved ANS design report states that the EWS design coverage objective is based on the following: <ul style="list-style-type: none"> Acoustical coverage from the EWS sirens should generally exceed 70dBC where the population density exceeds 2,000 persons per square mile within 10 miles of the plant. Acoustical coverage from the EWS sirens should generally exceed 60dBC where the population density does not exceed 2,000 persons per square mile within 10 miles of the plant. In areas where the population density does not exceed 2,000 persons per square mile, an alternate acceptance criterion is met when the system exceeds the ambient noise level by 10dBC. As noted in previous ALC letters, four areas required additional testing to determine if sufficient coverage existed based on their population density of >2000 people/mi². KLD Engineering was contracted to develop a Population within Siren Coverage Area Tool for DCPD to verify the 	

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<p>population density of the four potential gap areas as well as verify that the population in the entire EWS coverage area, that was previously identified as <2000 people/mi², has not increased to >2000 people/mi². From that, two of the four sites, 18 and 26, indicated a population density of >2000/mi² after the KLD analysis.</p> <ul style="list-style-type: none">Both potential gap areas are outside of 10 miles and as such are not required to meet the 70dBC requirements per the approved ANS design report. However, additional in field acoustical testing was conducted in 2018 at sites 18 and 26 during the annual siren test, including 24-hour background ambient. The results demonstrate the two gap areas have a sound pressure level measurement above 10 dB above the average ambient background providing reasonable assurance that members of the general public in these areas would be able to hear the outdoor warning system.
<p>8. A statement (if applicable) that in areas not covered by sirens, no permanent population has relocated into these areas. In areas of EPZ where no permanent population exists and transients would not frequent, a letter certifying this fact was provided with the initial design report. The state must certify that this condition remains unchanged; no permanent or transient population has relocated in these areas. If relocation did occur, sirens, tone alert radios, or other means for alerting these individuals would then be required.</p>
<ul style="list-style-type: none">Not applicable

Abbreviations and Acronyms

ADAMS	Agencywide Documents Access and Management System
ALC	Annual Letter of Certification
ANS	Alert and Notification System
ANSI	American National Standards Institute
CA	California
Cal OES	California Governor's Office of Emergency Services
CALWAS	California Warning System
CDPH	California Department of Public Health
CHP	California Highway Patrol
CMC	California Men's Colony
COO	Concept of Operations
CoViD-19	Coronavirus Disease 2019
CSWC	California State Warning Center
DCPP	Diablo Canyon Power Plant
DOC	Medical and Health Coordination Center
ENF	Enforcement Action Listing
EOC	Emergency Operations Center
EP	Emergency Planning

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EPZ	Emergency Planning Zone
EWS	Early Warning System
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Teams
FRO	First Responder Operations
GM	Geiger Mueller
HQ	Headquarters
IOSAT	Anbex, Inc trade name for potassium iodide
IS	Independent Study
JIC	Joint Information Center
KCOY	KCOY-TV, virtual channel 12 (UHF digital channel 19)
KEYT	KEYT-TV, virtual channel 3 (UHF digital channel 27)
KI	Potassium Iodide
KLD	KLD Engineering consultants for Emergency Planning
NAR	No Assistance Required
NERP	Nuclear Emergency Response Program
NIMS	National Incident Management System
NPP	Nuclear Power Plant or Nuclear Power Preparedness
NRC	Nuclear Regulatory Commission
NUREG-0654	US Nuclear Regulation 654
OEL	Offsite Environmental Laboratory
OES	Office of Emergency Services
ORO	Offsite Response Organization
PED	Personal Electronic Dosimeter
PG&E	Pacific Gas and Electric Company
PSAPS	Public Safety Answering Points
RadEye GX	Survey Meter for external Geiger-Mueller probes
REP	Radiological Emergency Preparedness
RP	DCPP Radiation Protection
SAIC PD-3i-s	Science Applications International Corporation Self-Reading Electronic Dosimeter
SHWC	Sheriff's Watch Commander
SLO	San Luis Obispo
SOP	Standard Operating Procedure
SREOC	Southern Region Emergency Operations Center
State Parks	California State Parks
TLDs	Thermoluminescent Dosimeters
TSC / OSC	Technical Support Center/Operations Support Center
UDAC	Unified Dose Assessment Center