

STATE OF ARIZONA
DEPARTMENT OF HOMELAND SECURITY
FEDERAL EMERGENCY MANAGEMENT AGENCY
RADIOLOGICAL EMERGENCY PREPAREDNESS PROGRAM

ANNUAL LETTER OF CERTIFICATION

2020

Purpose: To submit Annual Letter of Certification (ALC) documentation requested by the Federal Emergency Management Agency (FEMA) demonstrating that the State of Arizona is in compliance with periodic requirements as prescribed in criteria below.

Scope: The state ALC is reviewed annually 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.

Criteria: §44 CFR 350 Part 350.5, NUREG-0654/FEMA-REP-1 Rev 2, and the FEMA Radiological Emergency Preparedness (REP) Program Manual. Pursuant to these criteria, the ALC includes the following:

Update of Plans/Procedures and Letters of Agreement

1. The *State of Arizona/Maricopa County Offsite Emergency Response Plan - Palo Verde Generating Station* was reviewed throughout the year for accuracy and completeness of information, and appropriate changes made. Details of the review process and a summary list of updates are found within the plan.
2. Letters of Agreement for local primary and secondary hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated injured individuals, the National Weather Service, supporting utilities and other organizations are maintained by the Palo Verde Generating Station and are current. ORO agency support agreements are either stipulated as signatories to the “Offsite Plan,” the Arizona Mutual Aid Compact (AZMAC), or via the Emergency Management Assistance Compact (EMAC).

Public Education and Information (NUREG-0654/FEMA-REP-1 Evaluation Criteria G.1, G.2)

1. Annual dissemination of information to the public is performed annually, and this information includes how the public will be notified and what their actions should be in an emergency. Information is disseminated to 10-mile Emergency Planning Zone (EPZ) residents via calendar, posters, access/functional needs assistance surveys and periodic mailings concerning preparedness activities at the Palo Verde Generating Station (NUREG-0654/FEMA- REP-1, Evaluation Criteria G.1 and G.2).
 - a. PVGS disseminates information to the residents within the 10-mile EPZ via an annual mailing, and additional copies of all materials are also provided to local schools and businesses. Supplemental materials (e.g., siren test notifications) were disseminated to the

- EPZ population as appropriate. The annual mailer was sent on December 1, 2020. The Palo Verde Special Needs Survey was sent on December 1, 2020.
- b. Means of dissemination of these materials was U.S. Mail.
 - c. Identification of recipients is via a mailing list maintained by the utility (Arizona Public Service Company Distribution Services Department). Resident population is kept current through census information, monthly checks of utility service listings, annual functional/access needs surveys and regular contact with local postmasters.
 - d. Copies of all public information materials can be found through the following link at <https://ein.az.gov/get-prepared/prepare-kit>. Hard copies of all publications/brochures are available at DEMA and at the Palo Verde Generating Station.
2. Emergency information has been provided and is in place for locations frequented by transient populations in the 10-mile emergency planning zone (EPZ). Transient areas have not expanded nor have there been any addition to transient areas. (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2).
- a. A check of the continued presence and condition of previously placed emergency information materials is performed annually and was most recently accomplished on December 16, 2020.
 - b. Dissemination of emergency information for the transient population is in the form of both paper and metal posters that have been previously placed in area businesses, industry facilities, and schools.
 - c. A listing of poster locations can be found in (Attachment).
 - d. A sample poster can be found in (Attachment).
 - e. PVGS performs the annual check of the posters and updates/replaces the posters as needed.
3. There are no running rivers within the 10-mile EPZ. While the Gila and Hassayampa Rivers do pass through the EPZ, they are dry beds 350 days a year and have water in them only for a short time following significant rains. No fish or other wildlife congregate at these areas and no fishing or hunting occurs. There are no parks other than school playgrounds within the 10-mile EPZ. The far northwest corner of the 1500 acre Arlington Wildlife Area intersects Sector "H" 9.5 miles SSE of PVGS. There is no formal entrance/parking area within the EPZ. The only formal access to the Arlington Wildlife Area is from AZ 85 via the Robbins Butte State Wildlife approximately 19-miles east of PVGS. There are no other designated recreational areas within the 10-mile EPZ; yearly maintenance and updates of signage in these areas is not applicable (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2).
4. Emergency public information materials for the ingestion pathway consist of agriculture information booklets distributed to agriculture populations within the 50-mile Ingestion Planning Zone (IPZ) (NUREG-0654/FEMA-REP-1, Evaluation Criteria G.1 and G.2).
- a. PVGS disseminates this information via U.S. Mail on a periodic schedule. The Arizona Department of Agriculture and the Arizona Corporation Commission maintain the currency of water companies, farmer, rancher, food processor and food distributor address listings. They were most recently sent on April 25, 2019.
 - b. Copies of all public information materials can be found through the following link <https://ein.az.gov/get-prepared/prepare-kit>. Hard copies of all publications/brochures are available at DEMA and at the Palo Verde Generating Station.

5. An annual media program briefing was conducted to acquaint news media with emergency plans/procedures, information concerning radiation, and points of contact for release of public information in emergency. Additional briefing materials are disseminated to the media by utility communications staff on a routine basis. (NUREG-0654/FEMA-REP-1, Evaluation Criterion G.5).
 - a. The formal briefing was conducted on December 17, 2020.
 - b. Utility, state, and local government agencies participated. Sign in sheets detailing specific organizations that participated in the event are attached.
 - c. The briefing was a joint state/county/utility sponsored event.
 - d. A media advisory was issued prior to the briefing to assure widest dissemination. Media kits were provided to attendees. The program included an overview of PVGS, a discussion of the Offsite Emergency Response Plan, agency responsibilities and selected interviews. The agenda concluded with an opportunity for a Q&A session. An agenda is attached.

Radiological Emergency Response Training (NUREG-0654/FEMA-REP-1 Evaluation Criteria O.5)

1. Arizona Offsite Response Organization members that are responsible for implementing radiological emergency response plans/procedures participated in either initial or annual retraining in 2017.
 - a. All Offsite Response Organizations were offered and participated in training that is relevant to plans/procedures.
 - b. The scope of the training ranged from radiological emergency response to emergency management. The purpose of these courses was to give students the knowledge and skills that are needed to respond to any emergency, to include a potential or actual release from a commercial NPP. Courses that are conducted in Arizona to support the Offsite Response Organization capability to respond are found below.

DEMA coordinates the following training opportunities:

Government Orientation

This briefing provides annual training and re-training on offsite emergency response, and an opportunity to receive updates on program enhancements and a look at milestones and projected efforts for the new year.

Basic Public Information Officer (290)

Classroom instruction, group and individual activities related to advanced public information practices for any incident involving emergency response activities.

HazMat Technician (300)

Classroom instruction and group activities for responding to and mitigating an incident involving hazardous materials.

Intermediate ICS (300)

Classroom instruction and group activities related to the integration of ICS into emergency response plans, procedures and response facility operations.

Advanced ICS (400)

Classroom instruction and group activities related to ICS emergency response including staffing, plans, procedures, response facility operations, and field and EOC interfaces.

ICS/EOC Interface (191) <i>Classroom instruction and group activities to clarify the functions of field responder and EOC areas of responsibilities based on the ICS.</i>
All-Hazards Operations Section Chief (967) <i>Classroom instruction and group activities for individuals functioning as an EOC Logistic Section Chief during any emergency incident.</i>
Hazardous Materials First Responder Operations (200)
Hazardous Materials First Responder Operations – Refresher (201)
EOC Management and Operations (775) <i>Classroom instruction and group activities related to the fundamental organization, supporting plans and procedures and operation of an EOC in response to any emergency incident.</i>
EOC Operations & Planning for All-Hazards (346) <i>Classroom instruction and group activities related to the organization, supporting plans and procedures and operation of an EOC in response to any all-hazard emergency incidents.</i>
Joint Information System/Joint Information Center Planning for Public Information Officers (291) <i>Classroom instruction and group activities to provide a foundation for the understanding and implementation of the Joint Information System and the development and operation of a Joint Information Center.</i>
Advanced Public Information Officer (388)
Organizational Cybersecurity Information Sharing (020)
Public Safety CBRNE Response – Sampling Techniques and Guidelines
Recovering from Disasters – The Local Government Role (270.4) <i>Classroom instruction and group activities to provide a foundation for local government understanding and development of recovery plans.</i>
Pediatric Disaster Response and Emergency Planning (439) <i>Classroom activities prepared participants to effectively, appropriately, and safely plan for and respond to a disaster incident involving children, addressing the specific needs of pediatric patients in the event of a community based-incident. Pediatric specific planning considerations include mass sheltering, pediatric-triage, reunification planning and pediatric decontamination considerations.</i>
Radiological Emergency Preparedness Exercise Controller (327) <i>Classroom activities prepared participants to control the flow (play) of scenario events in a REP exercise to ensure the exercise is conducted in accordance with the exercise objectives and the Extent of Play Agreement.</i>
Radiological Emergency Preparedness Plan Review <i>Classroom activities for participants include review of REP emergency plans, specifically the NUREG 0654 planning standards that address the public's health and safety. This revised REP Plan Review Course will include training based on the Comprehensive Preparedness Guide (CPG) -101, familiarization of Hostile Action Based (HAB) plan review, annual plan review, and the Annual Letter of Certification Review process.</i>
REP Core Concepts Course <i>This course focuses on the nuclear power plant off-site radiological emergency preparedness program. Addresses the REP Program history and sentinel events, federal regulatory policies, basic radiation principles, REP planning guidance</i>

<i>(planning standards), REP demonstration guidance (exercise evaluation areas) and the REP Disaster Initiated Review process.</i>
<p>REP Exercise Evaluator Course <i>Topics include regulations and guidelines for evaluating REP exercises, in preparation of, observations during, post-exercise activities and techniques for exercise evaluation. This also includes the observation of video vignettes of REP exercises and the development of exercise narratives submitted to the REP Exercise Evaluation Tool, for review by REP adjunct instructors. Federal, state, local, tribal and utility personnel who are involved in the development of off-site REP plans and exercises may apply.</i></p>
<p>Radiological Accident Assessment Course <i>This course addresses radiological consequences of accidents involving radiological materials. This includes accidents or incidents involving commercial power reactors, lost sources, dispersion devices, and transportation. The focus of the course is concepts involved in formulating protective action recommendations following a radiological accident, such as dose quantities, atmospheric dispersion, dose projection, protective action guides, and derived intervention levels. Participants engage in problem-solving sessions and a tabletop exercise.</i></p>
<p>Medical Management of CBRNE Events (211) <i>Classroom activities for participants include facilitated discussions, small-group exercises, Human Patient Simulator hands-on scenarios, and traditional classroom discussions. Exercises are conducted in a CBRNE scenario using both adult and pediatric Human Patient Simulators to reinforce classroom lectures and interaction.</i></p>
<p>Homeland Security Exercise and Evaluation Program (HSEEP)(146) <i>Classroom instruction for The Homeland Security Exercise and Evaluation Program (HSEEP, which is a capabilities and performance-based exercise program that provides a standardized policy, methodology, and language for designing, developing, conducting and evaluating all exercises.</i></p>
<p>Evacuation and Re-Entry Planning (358) <i>Classroom instruction for design and implementation of evacuation and re-entry plans, using the community's vulnerability analysis and evacuation plan, addressing evacuation behaviors and recommended methods to increase efficiency.</i></p>
<p>Multi-Hazard Emergency Planning for Schools (364) <i>Classroom instruction to review, enhance and sustain their all-hazard school Emergency Operations Plan (EOP). This course explains how to utilize the National Incident Management System (NIMS) as the foundation for planning and building partnerships with outside agencies such as police, fire, and emergency management. In addition, this course will provide participants with opportunities to exercise their school EOP using Homeland Security Exercise and Evaluation Program (HSEEP) guidelines as well as guidelines on how to sustain their school EOP through action planning sessions.</i></p>
<p>Jurisdictional Threat & Hazard Identification & Risk Assessment (310) <i>Classroom activities for participants included conducting a Jurisdictional Threat and Hazard Identification and Risk Assessment. By using the THIRA process, stakeholders will develop a strategy to allocate resources and establish mitigation and preparedness activities. THIRA-informed planning is consistent with and expands on nationally accepted emergency management standards as the basis for</i></p>

planning across the mission areas of prevention, protection, mitigation, response, and recovery.

All-Hazards Communications Unit Leader (969)

Classroom instruction for personnel to establish the essential core competencies required for performing the duties of the Communications Unit Leader (COML) in an all-hazards incident.

Critical Infrastructure Key Resources Awareness (213)

This course introduced participants to the key terms, policy, guidance, and preparedness efforts required to safeguard the Nation's critical infrastructure. Participants will review applicable policy and guidance, discuss the risk management framework, describe Federal critical infrastructure security and resilience and information sharing programs, and relate critical infrastructure programs to individual actions.

Operational Level Response to HazMat/WMD Incidents (212)

Classroom instruction prepares emergency responders from all disciplines to recognize and identify hazardous material and to mitigate a HazMat incident by preventing further contamination of people, property, and the environment.

Critical Asset Risk Management (315)

Classroom activities included teaching participants the critical components of risk management. Through a combination of lecture, facilitated discussion, and group activities, participants will learn how threats, vulnerabilities, and consequences determine risk, and are given an opportunity to practice the fundamentals of conducting vulnerability assessments by conducting on-site assessments of select local facilities.

Advanced Critical Infrastructure Protection (414)

Classroom instruction focused on enhancing participant skills to formulate considerations for the resiliency of jurisdictional assets leveraging cross-sector partnerships. These considerations will enhance the whole community's ability to manage the risk associated with critical infrastructure protection efforts

Arizona Radiological Emergency Preparedness Program Briefing for PVGS Emergency Response Organization Teams

Classroom instruction for participants on the basics of offsite emergency response to an incident at PVNGS, tailored for utility emergency response organization teams that staff the utility Emergency Operations Facility

Arizona Radiological Emergency Preparedness Program Briefing

Classroom instruction for participants on the basics of offsite emergency response to an incident at PVGS.

Situational Awareness and Common Operating Picture (948)

Classroom instruction for participants included the Communications and Information Management component of the National Incident Management System.

Call Center Training

Classroom instruction on how to be a member of a call center that receives calls from the general public concerning emergency information.

ADHS coordinates the following training opportunities:

REAT Classroom Training

Classroom training on REAT procedures and the use of field monitoring instrumentation.

RASCAL Training <i>Classroom training on REAT procedures and the use of field monitoring instrumentation.</i>
REAT Field Training/Hotline <i>In field training on the set-up of REAT Forward, field sampling techniques, and contamination control/decontamination procedures.</i>
RCC Training/Hotline <i>Practical training specific to the monitoring and decontamination of evacuees and service/companion animals at an RCC.</i>

MCDEM coordinates the following training opportunities:

Contaminated Injury First Responder Training <i>Briefing on the set up and coordination for operations and a practical drill based on response activities related to responding to and transporting a contaminated injury patient based upon a simulated PVNGS incident.</i>
Contaminated Injury EOC Training <i>Briefing on the set up and coordination for EOC support for operations based on response activities related to responding to and transporting a contaminated injury patient based upon a simulated PVNGS incident.</i>
RCC Staff Team Training <i>Briefing on RCC set-up and operation, including training on the use of WebEOC, and a practical involving the actual set-up and operation of an RCC based on a simulated PVNGS incident.</i>
EOC Palo Verde Training <i>Briefing on the MCEOC operation and a practical drill based on response activities related to a simulated PVNGS incident.</i>

PVGS coordinates the following training opportunities that support the offsite response program:

Emergency Action Level (EAL) Training <i>Classroom training on PVNGS Emergency Action Levels</i>
Emergency Action Level (EAL)/RASCAL Training <i>Classroom training on PVNGS Emergency Action Levels and Dose Assessment using RASCAL software.</i>
Joint Information Center Training Drills <i>Practical training drills involving the development of hard copy media statements and the conduct of media briefings.</i>
Spokesperson Training <i>Practical training and critique of spokesperson responsibilities for media briefing and news conferences held in support of an incident at PVNGS.</i>

Additional radiological emergency preparedness related conferences/training that are regularly attended by REP Program personnel include:

Radiological Emergency Preparedness Program Executive Education Program	NRC Region IV Training, Outreach, Planning Workshop
National REP Conference	FEMA Region IX REP Workshop

- c. Specifics regarding agencies and number of participants that were involved in the abovementioned training can be found in (Attachment-Sign in sheets with course name,

date, participants and associated agency).

Drills (NUREG-0654/FEMA-REP-1, Evaluation Criteria N.2)

There were [redacted] noted outstanding exercise findings since the most recent full scale biennial exercise. Any drill and exercise planning issues have been addressed and have been or are in the process of being resolved.

1. Periodic communication drills are conducted to evaluate emergency response capabilities and maintain key skills according to NUREG-0654/FEMA-REP-1 (Rev 1) Evaluation Criteria N.2.a:
 - a. Monthly PVNGS Siren Alert System tests were completed with the Department of Public Safety (DPS), Maricopa County Sheriff Office (MCSO), and Maricopa County Department of Emergency Management (MCDEM).
 - b. Quarterly PVNGS Telecommunications tests of the dedicated telephones and fax machines were conducted with the DEMA SIOC, ADHS, the MCDEM MCEOC, the Joint Information Center (JIC), and the City of Buckeye. DEMA conducts monthly communications tests with the FEMA RIX Watch Center during regularly scheduled notification system tests. ADHS has weekly contact with supporting agencies via the Regional Response Coordination Source and monthly contact via the Radiation Responder Network. No other states are within the Ingestion Pathway and require drills.
 - c. Annually, during at least one of the operations based exercises, communications between PVNGS, DEMA, ADHS, MCDEM, MCSO, JIC and the field monitoring teams are conducted.
 - d. Notification Alert Network (NAN) drills were conducted weekly between PVNGS, DEMA, ADHS, MCDEM, MCSO, DPS and the City of Buckeye Police Department. Copies of tests are available at PVNGS.
2. Radiological monitor pool combined drills and refresher training sessions were conducted during the year. These events, taken together, addressed capabilities related to plume collection of particulate and radioiodine samples and radiation measurements. These drill/training sessions, some multi-day, involved both classroom and field activities which included radiation theory, basic information about PVGS, exposure limits and turn-back protocols, survey and monitoring instrument operation, personnel monitoring techniques, sample collection/packaging/record keeping and chain of custody/transport, plume footprint determination, communications protocols, hot line operations and decontamination methodology. These events occurred on the following dates during the year:

[redacted]		[redacted]	
[redacted]		[redacted]	
[redacted]		[redacted]	
[redacted]		[redacted]	

3. Radiation Protection exercises were conducted as part of the following ADHS activities:

Activity	Date

- a. Specifics regarding agencies and individuals participating in these drills and exercises that represent trained Field Monitoring Team personnel can be found in (Attachment-Sign in sheets with event name, date, participants and associated agency).
4. Periodic Palo Verde Mini Drills are conducted to evaluate the Protective Action Recommendation and Decision making process and coordination with the Joint Information Center.
 - a. Specifics regarding dates, agencies and individuals participating in these drills can be found in (Attachment-Sign in sheets with event name, date, participants and associated agency).

24-Hour Staffing (NUREG-0654/FEMA-REP-1, Evaluation Criteria A.1.e)

1. Sufficient trained and capable staff is available to maintain 24-hour capability for protracted activation. This staff includes full-time state, county, local, tribal and utility emergency response personnel, on-call state support reservists and adjunct training faculty and available staff augmentation from emergency management professional organizations.

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. No new designated offsite emergency response facilities, communication systems or congregate care centers were added during the year.
2. No designated offsite emergency response facilities, communication systems or congregate care centers experienced substantial changes in structure or mission since initial evaluation.
3. Survey instruments, including the analytical equipment in the Arizona Department of Health Services, Bureau of Radiation Control (ADHS-BRC) lab, are in continuous use both for REP Program and non-REP Program related activities (e.g., incident response, responder training, evacuee and emergency worker monitoring and environmental analysis). The equipment is inventoried on an annual basis and inspected before use. The following outlines the type of equipment, quantity, and location (NUREG-0654/FEMA-REP-1 Evaluation Criteria H.10):

Equipment Type	Quantity	Location
High Purity Germanium Detector	6	ADHS-BRC, 4814 South 40 th Street, Phoenix, AZ 85040
Gas Proportional Detector	11	
10R/Digital Dosimeter	70	
Portal Monitor	12	
Survey Meters	45	

Also, initially located at ADHS, 150 North 18th Avenue, Phoenix, AZ 85007, TLD Cards are

then distributed to DPS, Sheriff's Office and ADHS/REAT participants.

4. Survey instruments are calibrated annually, but at varying dates during a 12-month period, and upon each use. The survey instrumentation is located at the ADHS office, 150 North 18th Avenue, Phoenix, AZ 85007. Laboratory equipment has quality assurance (QA) checks performed at least twice a week with calibration being accomplished based on QA results. All the lab equipment is located at the ADHS-BRC office, 4814 S 40th St, Phoenix, AZ, 85040.
5. Survey instruments are provided to fire departments that respond to emergencies within the 10-mile Emergency Planning Zone (EPZ). Palo Verde Generating Station provided the Tonopah Fire Department, Buckeye Valley Fire District and the City of Buckeye Fire Department each with one survey instrument, a FH 40 G-L Dose Rate Measuring Unit. These survey instruments are calibrated semi-annually in June and December by the Palo Verde Generating Station Calibration Shop located at 5801 S. Wintersburg Road, Tonopah, Arizona. Arizona does not use DRDs or CDV-138 instruments in support of PVGS response activities.
6. Sufficient quantities of potassium iodide (KI) are available for emergency workers and the resident population of the 10-mile Emergency Planning Zone (EPZ) (NUREG-0654/FEMA-REP-1 Evaluation Criteria J.10.e). All doses are 65mg.

Maintained For	Maintained By	Quantity and Package Size	Total Doses	Expiration
Emergency Workers	ADHS	50 20-tablet	1000 65mg doses	Dec 2026
10-mile EPZ residents	MCSO Avondale	160 20-tablet	3200 65mg doses	Mar 2025
10-mile EPZ residents	MCSO Avondale	1920 20-tablet	38400 65mg doses	Mar 2025
10-mile EPZ residents	MCSO Avondale	640 20-tablet	12800 65mg doses	Dec 2026
Arlington School	Arlington School	33 20-tablet	660 65mg doses	Mar 2025
Palo Verde School	Palo Verde School	61-20 tablet	2000 65mg doses	Mar 2025
Saddle Mountain USD	Saddle Mountain USD	147 20-tablet	2940 65mg doses	Mar 2025
Crossroads Academy	Crossroads Academy	2 20-tablet	40 65mg doses	Mar 2025

Alert and Notification

1. The routine siren testing program was completed pursuant to the design report (FEMA RPM Section V, Part A). Copies of the testing and analysis of the percentage of operable sirens are maintained by the Palo Verde Nuclear Generating Station and the Maricopa County Department of Emergency Management and are available for review. The annual Sire Test Report can be found in (Attachment-Annual Siren Test Letter).

Type of Test	When Conducted	Results
Annual Full Scale	December 2, 2020	100% success rate for both tests
Growth	Quarterly	Successful
Silent	Twice monthly	Successful

2. The analysis of the percentage of operable sirens during the immediately previous calendar year resulted in an operational rate percentage that was at least 90 %. This quarterly mathematical average was based upon results of all regularly conducted tests employed as part of the testing program.

Number of Warning Sirens in EPZ	Operational Rate Percentage (%)
70	100

3. Tone alert radio equipment has been properly implemented within the 10-mile EPZ (FEMA RPM Section V, Part A). No individual or business requesting a tone alert radio has been refused this equipment. Equipment is checked weekly during regularly scheduled tests of the EAS via the National Weather Service, Phoenix Forecast Office. Self-testing instructions are provided with the units. Written guidance is provided with each unit. A register for the location description and address of these units is as follows:

Name of Location for Tone Alert Radio	Address for Location
Arlington School	9410 S 355 th Avenue, Arlington, AZ 85322
Palo Verde School	10700 S Palo Verde Road, Palo Verde, AZ 85343
Tonopah Valley High School	38201 W Indian School Road, Tonopah, AZ 85354
Ruth Fisher School	38201 W Indian School Road, Tonopah, AZ 85354
Saddle Mountain Unified School District Administrative Offices	38201 W Indian School Road, Tonopah, AZ 85354

4. The *Offsite Emergency Response Plan for the Palo Verde Nuclear Generating Station* specifies the following actions should a siren not activate or tone alert radios fail to function (FEMA RPM Section V, Part A).
 - a. Maricopa County Sheriff's Office Deputy would be sent to the area around the siren. The officer would use his car loud speaker to notify residents that they need to turn on their radio or television for the EAS message. This special alerting system is simulated during drills and exercises by deputies driving through a selected siren failure area and providing instructions to simulated residents. This back-up notification system is also implemented for those instances where an individual siren may be out of service for repair, etc. Back-up notification may also be accomplished via the Community Emergency Notification System (CENS), a telephone based notification system similar to Reverse 911 or by Maricopa County Sheriff's Office rotary wing aircraft if needed.
 - b. Routine testing of route alerting by the MCSO, routes, and alerting methods and resources remain unchanged.
5. Schools receive individual telephone notification calls from the Maricopa County Department of Emergency Management or Maricopa County Sheriff's Office (off-hours) in the event of an accident at the power plant. This is in addition to a warning siren at each school and a tone alert radio at each school. There are no hospitals or health care facilities within the 10-mile EPZ.
6. No statement is required as this does not apply to Arizona.
7. Siren sound pressure/population density requirements have been met pursuant to the design report (FEMA RPM Section V, Part A). No population increases meeting the 2000 person threshold occurred during the year.
8. No substantial changes in areas not covered by sirens (no permanent population or transient frequency) occurred during the year. Planning did continue for the addition of 25 new sirens to the 10-mile EPZ so that all areas, inhabited or not, will have siren coverage. Ten new sirens

were installed in 2013, became operational and were tested in 2015, and were formally added to the system in January 2016. Twenty-five (25) additional sirens are scheduled to be added in the coming years. The ANS design report is being updated with the completion of each and submitted for review and approval.

Supporting Documentation

1. Further documentation that was collected throughout the calendar year is attached.
 - a. Exercise Participants (Attachment)
 - b. JPIP-Annual Boilerplate Review (Attachment)
 - c. Offsite Project Meetings (Attachment)
 - d. Planning Meetings (Attachment)