Standard Operating Guide

Assessment of Offsite Emergency Preparedness Infrastructure and Capabilities Following an Incident in the Vicinity of a U.S. Nuclear Regulatory Commission Licensed Nuclear Power Plant

Technological Hazards Division | Radiological Emergency Preparedness

April 2024

FEMA

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U.S. Department of Homeland Security
Washington, DC 20472

December 15, 2022

MEMORANDUM FOR: Regional Administrators
Federal Preparedness Coordinators
Regional Assistance Committee Chairs

DAVID M GUDINAS Digitally signed by DAVID M GUDINAS Date: 2023.01.13 14:32:49
Acting on behalf of Erin Hoffman

FROM: Erin Hoffman
Director, National Exercise and Technological Hazards Division (THD)
National Preparedness Directorate (NPD)

SUBJECT: Standard Operating Guide (SOG) – Preparedness Assessment (PA), Preliminary Capabilities Assessment (PCA) and Disaster Initiated Review (DIR)

Attached please find the revised Standard Operating Guide (SOG) – "Assessment of Offsite Emergency Preparedness Infrastructure and Capabilities Following an Incident in the Vicinity of a U.S. Nuclear Regulatory Commission Licensed-Nuclear Power Plant". As a result of the 2020 COVID-19 public health emergency, THD hosted a series of meetings with headquarters and regional representatives from NRC and FEMA to discuss changes to respective agency's procedures related to the Preparedness Assessment (PA), Preliminary Capability Assessment (PCA) and Disaster Initiated Review (DIR) process. From those discussions, recommendations were identified to address areas for improvement within the respective agency's procedures. The changes found in this revised SOG provide clarification regarding FEMA's and the NRC's Pre-Event Coordination efforts, as well as, provide a common understanding of agency expectations for the immediate (prompt) assessment of offsite emergency preparedness capabilities.

This SOG contains guidelines and procedures for the FEMA REP Program to conduct and document the results of a FEMA-led PA/PCA/DIR, which I am authorizing with this memo.

Procedural enhancements addressed in the 2022 Revision of the SOG:

- Incorporation of the Preparedness Assessment Process detailing pre event coordination efforts and common language of agency expectations. (Region Request),

- Updated electronic PCA Checklist (fillable pdf forms),

The revisions to this SOG are consistent with the radiological emergency planning and preparedness standards described in 44 CFR Part 350, NUREG-0654/FEMA-REP-1, Rev. 2, the REP Program Manual (December 2019), and NRC Inspection Manuals, as amended). Additionally, this version will be subject to review/revision on a cycle no later than 18 months from this date.

If you have any questions about the SOG, please contact Mr. Tom Warnock, Chief, Radiological Emergency Preparedness Branch at (202) 657-2301.

Cc: Nuclear Regulatory Commission (Attn: Office of Nuclear Security and Incident Response)

Record of Changes

The most current copy of this document, including any changed pages, is available through the Federal Emergency Management Agency (FEMA) Technological Hazards Division (THD) Radiological Emergency Preparedness Branch. Email all revision requests to THD-ACTION-OFFICE@fema.dhs.gov.

Change No.	Summary of Change	Date Entered
1	Incorporate Preparedness Assessment Process for Public Health Emergencies. Edits to PCA Checklist.	September 2022

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1. Background

Organize the "BEST" (Build, Empower, Sustain, and Train), Scalable, and Capable Incident Workforce

Strategic Goal 2: Ready the Nation for Catastrophic Disasters

FEMA 2018-2022 Strategic Plan

In March 2018, FEMA outlined the vision for the field of emergency management in its 2018-2022 Strategic Plan. The vision based on shared expectations sets an ambitious yet achievable path forward to unify and further professionalize emergency management across the country. The Strategic Plan sets out three overarching Strategic Goals for the organization:

- Building a Culture of Preparedness by encouraging and empowering every segment of our society, from individual to government, industry to philanthropy, to prepare for the inevitable impacts of future disasters.
- Readying the Nation for Catastrophic Disasters by working with partners across all levels of government to strengthen partnerships and accessing new sources of scalable capabilities to quickly meet the needs of overwhelming incidents.
- Reducing the Complexity of FEMA by leveraging data that drives decision-making and reduce the administrative and bureaucratic burdens that impede impacted individuals and communities from quickly receiving the assistance they need.

The manner of how we operate is reflective of the goals and objectives as promoted in the FEMA 2018-2022 Strategic Plan. The Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) Radiological Emergency Preparedness (REP) Program has the primary responsibility to continually assess the status of offsite emergency preparedness (EP). Through this effort, the FEMA REP Program makes a reasonable assurance determination that, should a radiological emergency occur, the offsite response organization's (ORO's) emergency plans can be implemented to adequately protect public health and safety through offsite actions. FEMA provides such determinations to the U.S. Nuclear Regulatory Commission (NRC).

FEMA implements this Standard Operating Guide (SOG) consistent with the agreements in the Memorandum of Understanding (MOU) between FEMA and the NRC "Regarding Radiological Response, Planning, and Preparedness," dated December 7, 2015. If a disaster causes damage or changes to the offsite emergency response infrastructure in the vicinity of an NRC-licensed nuclear power plant (NPP) to the extent that the damage raises serious questions about the continued adequacy of offsite EP, the identifying agency (FEMA/NRC) will inform the other promptly.

All agency decisions made pursuant to this SOG involving FEMA and NRC are coordinated at the Headquarters (HQ) level. For the purpose of this document and appendices, the term "FEMA Region"

refers to the regional component of the FEMA REP Program. Additionally, all references to the FEMA Regional Administrator, Regional Assistance Committee (RAC) Chair, FEMA REP Branch Chief, and the FEMA Technological Hazards Division (THD) Director include the individual holding the position or their designee.

2. Purpose

This SOG contains guidelines and procedures for the FEMA REP Program to conduct and document a FEMA-led Preparedness Assessment (PA), Preliminary Capabilities Assessment (PCA), and Disaster Initiated Review (DIR) when a natural or man-made disaster has or is suspected to have caused significant damage or alters the emergency response infrastructure around an NRC-licensed NPP to the extent that the damage raises serious questions about the continued adequacy of offsite EP.

3. Scope

This SOG should primarily be used when a natural or man-made disaster (hurricane, earthquake, tornado, etc.) causes significant damage or alters the emergency response infrastructure around an NRC-licensed NPP to the extent that the damage raises serious questions about the continued adequacy of offsite EP. However, the guidance provided in Appendix D, "Preliminary Capabilities Assessment (PCA) Checklist," may be used to the extent practicable, based on FEMA Region's judgment, for the conduct of a Preliminary Assessment. Moreover, these guidelines apply when an NPP is shut down or operating. If FEMA determines that there is a compromise of "reasonable assurance," the FEMA Region and FEMA REP Program will coordinate with OROs and the NRC to determine necessary actions to ensure the continued protection of public health and safety.

FEMA Regional Leadership may elect to use this SOG as guidance, to the extent deemed appropriate, to conduct a Preparedness Assessment to support the continued monitoring and evaluation of the impact of proposed state/local compensatory measures for unusual situations, such as local, state, or tribal government-driven budget shutdowns, national public health emergencies, etc. For these instances, the FEMA Region will negotiate the terms of review with the affected state.

The RAC Chair and the DIR Team may tailor and modify operations outlined in this SOG based on the extent of damage and the urgency for plant startup. The FEMA REP Program and FEMA Region, in consultation with the OROs and the NRC, will determine necessary actions to ensure adequate protection of public health and safety. If reasonable assurance is in question while the NPP is operational, the FEMA REP Program will follow procedures outlined in 44 CFR § 350.13.

4. Objectives

- Identify applicable criteria, as part of a PCA, to determine whether a DIR is warranted to assess the capability of offsite emergency response infrastructure. Provide a PCA report template (Appendix F).
- Identify FEMA Regional personnel roles and responsibilities related to completion of objectives (Section VI).
- Identify FEMA REP Program staff roles and responsibilities associated with providing a reasonable assurance finding to the NRC following satisfactory completion of a PCA or DIR (Section VI).
- Establish communication links and assign roles for information sharing and coordination among the FEMA Region, OROs, and the NRC, in completion of a PCA or DIR (Section VI).
- Provide pre-scripted report templates (Section VI.A) to communicate the FEMA REP Program's initial PCA and DIR findings to the NRC.
- Provide a flow chart to display the path that determines the need for a DIR and the communication flow of the response structure (Appendix A).
- Provide a DIR report template (Appendix F) to communicate DIR findings from the FEMA Region to the FEMA REP Program for use in providing a reasonable assurance finding.
- Establish guidelines for conducting a Preparedness Assessment to support the continued monitoring and evaluation of the impact of proposed state/local compensatory measures for unusual situations, such as local, state, or tribal government-driven budget shutdowns, national public health emergencies, etc.

5. Responsible Office

Questions pertaining to this document should be referred to FEMA Technological Hazards Division, Attention: THD-Action-Office (thd-action-office@fema.dhs.gov).

6. Preparedness Assessments

In response to significant events, such as Presidential national emergency declarations, government shutdowns, and public health emergencies, the Preparedness Assessment approach outlines how the Radiological Emergency Preparedness Program (REPP) will continue to assess the preparedness capabilities within stakeholder communities to ensure the ongoing protection of public health and safety. This community-based assessment is conducted using the PCA questions in the next section and will serve as the basis for obtaining the needed information.

This approach consists of three condition-based steps:

Step 1. Proactive and Enhanced Monitoring

a. Establishment of the baseline assessment.

b. Continuous communications between THD HQ and Regional Staff

    i. Weekly Reporting:

        1. Unstable: Red - Indicates capabilities/services are disrupted and no solution identified or in progress (Unstable, no solution in progress)

        2. Stabilizing: Yellow - Indicates capabilities/services are disrupted but solution in progress with estimated time to stabilization identified (Unstable, solution in progress)

        3. Stable: Green - Indicates capabilities/services are stabilized, re-established, or not impacted (Stable)

c. Preparing to support assessments.

d. Collaboration and situation assessment processes.

e. The scheduling and conduct of Preparedness Assessments are coordinated by the respective FEMA Region with their respective NRC Regional State Liaison Officer (RSLO) counterparts for awareness purposes; however, actual participation by the NRC RSLO is not required. The respective FEMA region should also inform the NRC RSLO counterpart of interim findings.

Step 2. Conditions-Based Assessment of Community Capabilities

a. For REPP, as required, conduct supplemental assessments as determined by the RAC Chair, as indicated by the data obtained in Step 1, or as dictated by the condition/circumstances.

b. For REPP, submission of the formal assessment from the RAC Chair or Regional Administrator (RA) to the THD Director indicating whether a more formal assessment is warranted.

c. Utilize existing assessment processes and procedures.

d. Analysis of Emergency Planning and Preparedness for response in a degraded environment.

e. The formal results of a Preparedness Assessment, when completed, should be provided via a letter from the FEMA THD Director to the NRC Director, Preparedness and Response Division. After confirming with FEMA THD, this documentation is entered into the NRC's Agency-wide Documents Access and Management System (ADAMS) as publicly available.

Step 3. REPP Disaster Initiated Review (DIR)

If required, based on the results of Step 2:

a. A full and complete DIR is conducted and led by the FEMA Regional staff.

b. A written report is prepared indicating RA's recommendation on Reasonable Assurance (with or without compensatory measures) and submitted to THD.

c. THD Director officially notifies the Nuclear Regulatory Commission Headquarters and FEMA/National Response Coordination Center of the DIR determination.

NOTE: A DIR should only be initiated if it has been confirmed that a disaster has caused significant damage or changes to the offsite emergency response infrastructure in the vicinity of an NRC-licensed nuclear power plant (NPP) to the extent that the damage raises serious questions about the continued adequacy of offsite EP.

7. PCA/DIR Determination

While the following guidance has been designed specifically for natural or man-made disasters resulting in plant shutdowns, it can also be used to address situations such as local, state, or Tribal budget-driven shutdowns.

A. Preliminary Capabilities Assessment

When a natural or man-made disaster has occurred at, or near, an NPP and has no or minimal effect on the plant, but damage or changes to the offsite emergency response infrastructure may be substantial or are in question, FEMA may elect to perform a PCA or DIR to assess the impact. The operating status of the NPP should not be a deciding factor. Should FEMA's review indicate that offsite emergency response infrastructure and capabilities do not provide reasonable assurance that adequate protective measures can and will be taken in a radiological incident, and the NPP continues to operate, then such a finding would be handled by the NRC under 10 CFR § 50.54(s) (2) and (3).

FEMA uses a PCA to obtain a prompt assessment (snapshot) of offsite EP immediately following an incident to assist the FEMA Region/FEMA REP Program's joint determination on the need and timing for a DIR. The DIR's purpose, as addressed in the FEMA/NRC MOU, is to formally determine the offsite emergency response infrastructure and capabilities to effectively implement approved emergency plans. Communications and coordination between the FEMA REPP and the NRC during the PCA process should be maintained primarily at the regional level between the RAC Chair and the NRC Regional State Liaison Officer (RSLO). The respective Regions are responsible for updating the respective FEMA REPP staff on the incident status during the PCA.

The PCA should include these questions:

- Has a local, state, or tribal nation declared an emergency?
- Are offsite emergency response facilities operational?
- Are communications systems operable?
- Are Emergency Response Organizations (EROs) critical to support available?
- Are Alert and Notification Systems (ANS) operational?
- Is transportation available and facilities for people with disabilities and access/functional needs operational?
- Are evacuation routes unimpeded?
- Are personnel, equipment, laboratory, transportation, and communication resources for accident assessment available?

- Is there a disaster-related population change, and are resources to assist with the evacuation of transportation-dependent populations available?
- What compensatory measures have been put in place by local, state, and Tribal Governments or NRC licensees?
- What is the initial infrastructure assessment for the facility, state, Tribal, and local risk and host counties?
- Are EPZ counties and states capable of implementing protective actions?

If the answer to any of the above questions reflects an inability to coordinate response operations effectively, the appropriate compensatory measures should be developed and implemented. As part of this process, consideration should be given to whether backup means are available.

These compensatory measures may be the responsibility of the OROs or the NRC Licensee. Compensatory measures required from the NRC Licensee should be coordinated through the NRC.

FEMA should maintain record(s) from the PCA in both the respective Region(s) and FEMA Headquarters.

B. Disaster Initiated Review

The decision to conduct a DIR is a joint decision between the applicable Regional Administrator and the FEMA THD Director, who represents the FEMA Administrator. The appropriate RAC Chair and FEMA REP Program Branch Chief will participate in the process. Conference calls with all involved parties are encouraged and are specifically important for no-notice incidents.

When evaluating whether the affecting incident warrants the implementation of this Guide, consider whether alternative means (i.e. alternative routes should a roadway or bridge be inaccessible) can adequately compensate for the offsite functions that have been impacted.

Section VI provides guidance on implementing a DIR Team and conducting a DIR with further direction in the subsequent appendices.

C. Nuclear Regulatory Commission (NRC) Engagement

The NRC may request FEMA, through the REPP, provide a reasonable assurance finding in support of a planned reactor start-up. This finding may conclude that the applicable ORO's emergency plans can and will be implemented to protect public health and safety in a radiological incident at the specific NRC Licensee emerging from the shutdown.

If the NRC determines that the status and/or conditions of EP do not provide reasonable assurance that adequate protective measures can and will be taken in a radiological emergency (including findings based on requirements of 10 CFR 50, Appendix E, section IV.D.3) and if the deficiencies

(including those based on requirements of Appendix E, section IV.D.3) are not corrected within four months of that finding, the NRC will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate.

The NRC will make a determination on the suitability of ORO's emergency plans based on a review of FEMA's findings and determinations. This paragraph in no way limits the authority of the NRC to act under other regulations at any time they deem appropriate.

8. Responsibilities

A. FEMA Technological Hazards Division Director (or Designee)

- Inform the NRC Director, Preparedness and Response Division, via formal letter of the results of a Preparedness Assessment when complete.
- In consultation with the FEMA Regional Administrator, make a final determination on the need for a DIR.
- Review the DIR Findings Report and assess recommendations of reasonable assurance.
- Communicate, in writing, the decision on whether to conduct a DIR to the NRC Director, Division of Preparedness and Response in the Office of Nuclear Security and Response (NSIR/DPR), using the examples provided below for the initial statement:
    - **NOTE**: If an urgent need exists to communicate results promptly to the NRC in support of NPP restart, the FEMA THD Director (or Designee) can communicate by voice through the NRC Operations Center at 301-816-5100 (recorded line) and request to speak with the NRC NSIR/DPR Director.
- The following are examples of final determination language that FEMA can provide to the NRC:
    - *Example #1: PCA Finding – Continued Reasonable Assurance*
        - "On [DATE], based on the Preliminary Capabilities Assessment (PCA) performed, our review of available information gathered in discussions with the OROs, FEMA has concluded that offsite radiological emergency preparedness (EP) remains adequate to pro- vide "Reasonable Assurance" and that appropriate measures can be taken to protect the health and safety of the public in a radiological emergency at the [NUCLEAR POWER PLANT]. At this time, FEMA is not initiating actions to conduct a Disaster Initiated Review (DIR) of offsite EP issues within the [NUCLEAR POWER PLANT] 10-mile emergency planning zone."
    - *Example #2: PCA Finding – DIR is Warranted*

  - "On [DATE], based on the Preliminary Capabilities Assessment (PCA) performed, our review of available information gathered in discussions with the OROs, FEMA has concluded that impediments may exist to offsite radiological emergency preparedness (EP) within the [NUCLEAR POWER PLANT] EPZ. This requires further evaluation to verify appropriate measures can continue to be taken to protect the health and safety of the public in the event of a radiological emergency. FEMA is initiating a Disaster Initiated Review (DIR) of offsite EP issues within the [NUCLEAR POWER PLANT] EPZ."

- Communicate the decision to conduct a DIR to the FEMA Deputy Administrator-Resilience, Assistant Administrator, National Preparedness Directorate (NPD), Office of Response and Recovery (ORR), and the FEMA National Watch Center (NWC).

- Once the DIR is completed, review the DIR Findings Report submitted by the FEMA Region and, if required, request additional input from the RAC Chair. An interim written report of FEMA's DIR Findings Report, including a reasonable assurance finding, should be prepared and submitted to the NRC Director, NSIR/DPR, using a pre-approved template. A formal letter will then supplement this initial statement. An example is provided below for the initial statement:

  - *Example #3: DIR Finding – Continued Reasonable Assurance*

    - "On [DATE], a comprehensive investigation and collection of field data was performed by a joint FEMA/NRC Disaster Initiated Review (DIR) Team, in accordance with the FEMA Post Disaster Assessment of Offsite Capabilities checklist. Based on our review of all information gathered, FEMA has concluded that offsite radiological emergency preparedness remains adequate to provide "Reasonable Assurance" and that appropriate measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the [NUCLEAR POWER PLANT]."

B. FEMA Regional Administrator (or Designee)

- Participate in conference calls regarding the decision to conduct a DIR.

- Review the RAC Chair's recommendation for conducting a DIR. Provide a recommendation to the FEMA REP Branch Chief for the conduct of a DIR.

- Review the DIR results and/or Findings Report the RAC Chair submitted.

- Submit assessment results to the FEMA THD Director with the Regional Reasonable Assurance finding.

C. Regional Assistance Committee Chairperson (or Designee)

- Participate in conference calls regarding the decision to conduct a DIR.

- Notify the FEMA REP Branch Chief of an impacting incident.

- Provide a recommendation to the FEMA Regional Administrator for the conduct of a DIR.
- During and/or following an incident, the respective FEMA Regional staff should be in close communication with the respective OROs, NRC RSLO, and Regional Response Coordination Center (RRCC) regarding the condition of the offsite emergency response infrastructure, the reactor plant status, and Licensee activities.
- If the information provided reveals that there is not sufficient damage to the EPZ offsite emergency response infrastructure to raise doubts on the adequacy of offsite EP, the RAC Chair should notify the FEMA REP Program Branch Chief of the assessment.
- The RAC Chair may submit an independent recommendation regarding the adequacy of offsite EP if the assessment does not agree with the information provided by the OROs.
- Conference calls between all involved parties are encouraged. These conference calls are specifically important for "no-notice" incidents. Based on information acquired from any of these sources on damage sustained or security issues, the FEMA Technological Hazards Division Director, in consultation with the RAC Chair, will make a determination on the need for a DIR.
- When incident-related damage or changes to the offsite emergency response infrastructure is considered to be substantial or in question, the RAC Chair, following consultation with the FEMA Technological Hazards Division Director, will:

    1. Discuss the initiation of a Preparedness Assessment or PCA and review the results.
    2. Prepare and transmit a Preparedness Assessment or PCA Report to the FEMA Regional Administrator then forward the results to the FEMA THD Director (via the FEMA REPP Branch Chief). A template for the PCA Report is included in Appendix F. The respective Region and FEMA Headquarters should maintain a record(s) from the PCA.
    3. If warranted, based on the results of the Preparedness Assessment or PCA, conduct a DIR.
    4. Establish a schedule for conducting the DIR. In establishing the schedule, FEMA should consult with OROs, the NRC, and the affected NRC Licensee.
    5. Establish the DIR Team responsible for conducting the DIR within 24 hours of the decision to conduct a DIR. DIR Team should include (to the maximum extent practicable):

        a. The RAC Chair (or designee) and Site Specialist;
        b. A representative from the NRC Regional Office (coordinated through respective NRC RSLO);
        c. Representatives from the affected OROs emergency management programs and radiation control programs; and

d. Representatives from the emergency-planning staff of the affected NRC Licensee.

- Oversee and coordinate the completion of the DIR, maintaining the established schedule. The DIR Team should use the Post Disaster Assessment of Off-Site Capabilities (Appendix E) to ensure that essential emergency response elements are included in the review. The RAC Chair should complete an assessment for each impacted jurisdiction. The RAC Chair designee from the DIR Team will provide routine progress updates to the RAC Chair or FEMA REP Program Branch Chief.

- Prepare and transmit a DIR Findings Report to the FEMA Regional Administrator. A template for the DIR Report is included in Appendix F.

D. FEMA Radiological Emergency Preparedness Program Branch Chief (or Designee)

- Participate in conference calls regarding the decision to conduct a DIR.

- Review the FEMA Regional Administrator's recommendation for conducting a DIR. Provide a recommendation to the FEMA THD Director for the conduct of a DIR.

- Communicate the recommendation for conducting a DIR to the FEMA THD Director.

- Orally communicate the status of offsite EP with the designated NRC Headquarters Branch Chief, to include, at a minimum:

  1. FEMA's decision to conduct a PCA to obtain an initial review of offsite emergency response infrastructure and EP capabilities surrounding the NPP site based on a natural or man-made disaster in determining whether a DIR is warranted.

  2. The periodic status of PCA and DIR activities, the expected schedule for completing reviews, and any potential issues identified.

- Review the Region's DIR Findings Report and provide a recommendation to the FEMA THD Director to support a reasonable assurance finding or request additional input from the RAC Chair prior to submittal to the FEMA THD Director.

9. Regional Incident Response and Coordination Strategy

Following the 2017 Hurricanes, a December 19, 2017, conference call discussing the PCA/DIR process between the NRC and FEMA took place. A regional team was identified to draft some enhanced guidance to ensure timely coordination between FEMA and the NRC before, during, and after a disaster.

In a collaborative effort, the team developed the attached Appendix to the DIR/PCA SOG "Regional Incident Response and Coordination Strategy" in Appendix C.

10. General Disaster Initiated Review Team Kit Guidance

DIR kits should be prepared in advance with information on each NRC Licensee within the FEMA Region. The RAC Chair develops these kits and should include (but are not limited to):

- Copies of this SOG with additional copies of the Post Disaster Assessment of Off-Site Capabilities checklist. Use one checklist for each impacted jurisdiction. (Appendix E);
- Copies of ORO emergency response plans for the site;
- Copies of the ANS Design Report for the site. (Useful in determining the disaster's impact on the alert system);
- Copies of public/emergency information materials distributed. (Useful in reviewing evacuation routes and public information-related items);
- Copies of the Evacuation Time Estimates. (Useful in determining the impact of the disaster on evacuation);
- Contact phone listings for OROs (to include emergency contact information). If satellite phone numbers are available, these numbers should be included as well;
- Contact phone listings for the NRC Regional Office (to include emergency contact information);
- Contact phone listings for FEMA REP Program Leadership. This should include contact information (and emergency information) for the FEMA REP Program Branch Chief, the FEMA THD Director, and the FEMA Office of Chief Counsel;
- Cellular phone and satellite phone (if available);
- Government Emergency Telephone System (GETS) Cards;
- Laptop and printer;
- Digital camera (or Smart Phone); and,
- Global Positioning System (GPS) Navigation System.

Accommodations in the disaster area may not be available. The DIR Team should be prepared to obtain nontraditional lodging (sleeping bags, etc.) when necessary.

NOTE: DIR Team members should be aware and understanding of state/local priorities and needs following a disaster. Other operations/activities may take precedence over activities related to conducting a PCA or DIR.

If a capability or location has been affected, the DIR Team should determine whether there is an alternative approach that can be implemented. They should also assist in and be actively engaged in developing acceptable solutions. If the DIR Team encounters delays or problems, they will notify the RAC Chair as soon as possible.

Upon completing a DIR assessment, the Region prepares the draft DIR Findings Report for FEMA. Prior to distributing the Report to Team members, submit the Draft DIR Findings Report to the RAC Chair, the FEMA REP Branch Chief, and the FEMA THD Director for comment and concurrence (be prepared to submit additional information if requested by collecting all documents, e-mails, notes, field notes, and any document created throughout the DIR). The FEMA Region keeps the DIR and all documentation for official records.

The RRCC coordinates information and logistics for entering an area where a disaster has hit. Lastly, information collected in the PCA and DIR should be shared with the RRCC to ensure transparency and efficiency in future FEMA response efforts.

NOTE: For guidance on how to prepare and format the report, refer to the Preliminary Capabilities Assessment (Appendix D), DIR Review Checklists (Appendix E), and the Report Guidelines Memo (Appendix F).

11. References

- 44 CFR Parts 350 – 354.
- 10 CFR Part 50.
- NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Washington D.C., November 1980.
- NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Addenda, Washington D.C., March 2002.
- NUREG-0654/FEMA-REP-1, Rev.1, Supplement 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants – Criteria for Utility Offsite Planning and Preparedness, Final Report, Washington D.C., September 1988.
- NUREG-0654/FEMA-REP-1, Rev.1. Supplement 4: Criteria for National Preparedness Initiative Integration, Exercise Enhancement, and Backup Alert and Notification Systems, October 2011.
- FEMA/NRC Memorandum of Understanding (December 7, 2015), “Memorandum of Understanding between the Department of Homeland Security/Federal Emergency Management Agency and the Nuclear Regulatory Commission Regarding Radiological Emergency Response, Planning, and Preparedness.
- REP Program Manual. (January 2017).
- NRC Inspection Manual, Manual Chapter (MC) 1601, Communication and Coordination Protocol for Determining the Status of Offsite Emergency Preparedness.

Appendix A: FEMA REP Incident Review Process Diagram

The diagram below outlines the communication direction and actions that the FEMA REP Program initiates during a DIR.

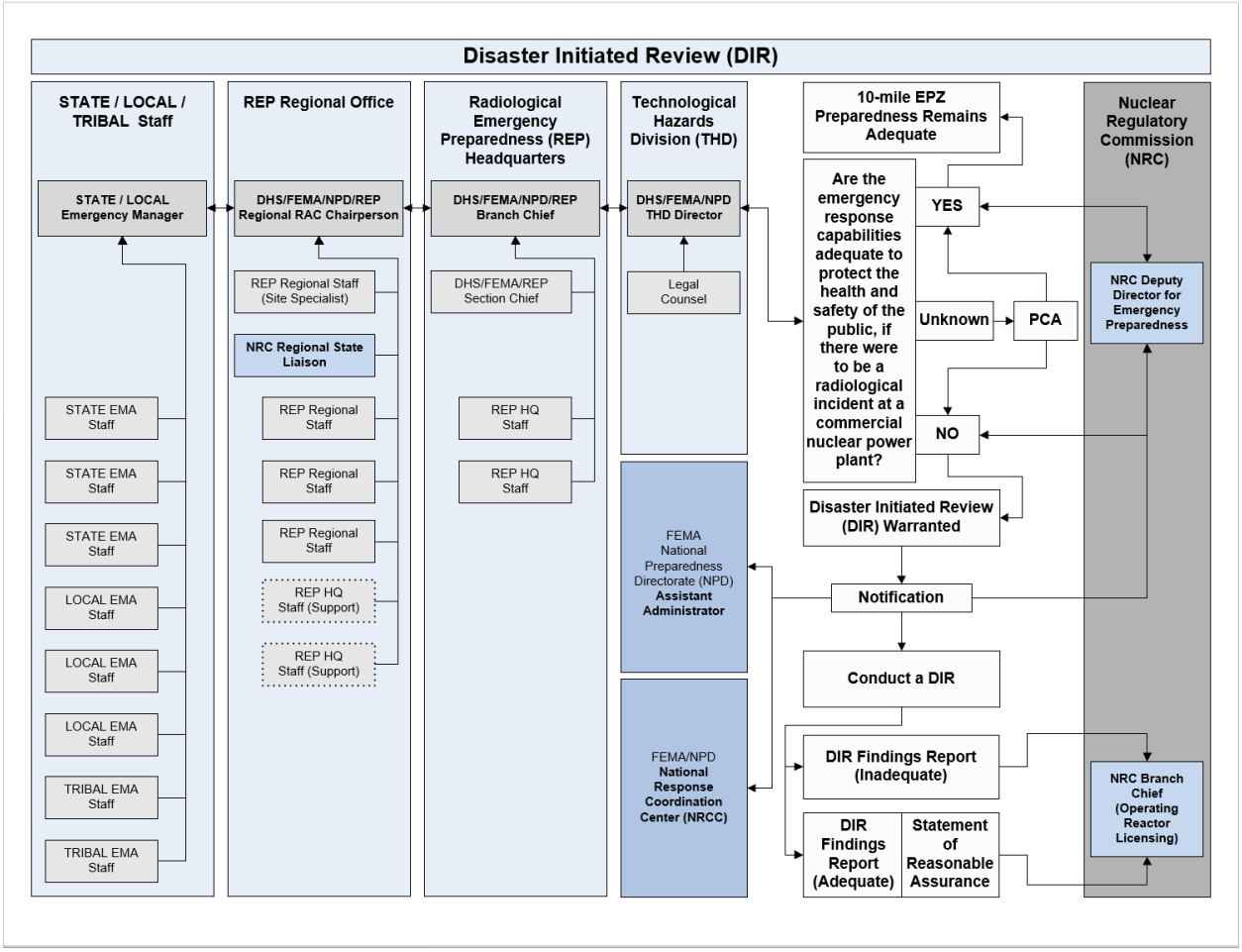

Figure 1. Disaster Initiated Review (DIR) Process Diagram

If the offsite response infrastructure and capabilities status is “Unknown,” a PCA should be conducted to determine the effects on response.

Appendix B: DIR Decision Process Checklist

A. Organization Assignment of Actions

The following chart outlines the key steps in the process for conducting a DIR and the Office of Primary Responsibility (OPR).

	OPR	
Key Steps in Conducting a DIR	**FEMA REP Program**	**REP Region**
1. Impacting incident.	X	X
2. Establish a conference call between the FEMA THD Director, FEMA Regional Administrator(s), FEMA REP Program Branch Chief, RAC Chair, and respective NRC RSLO, to make a determination on the need for a DIR. This may involve the determination to perform a PCA to obtain a prompt assessment of offsite EP capabilities immediately following the incident to assist in FEMA's determination on the need and timing for a DIR. (ESTABLISHED BY THE FEMA REP PROGRAM)	X	X
3. Communicate the recommendation to FEMA THD Director.	X	X
4. Facilitate communication with NRC regarding DIR process.	X	X
5. Determination if a DIR is needed.	X	
6. Establish a DIR Team within 24 hours of decision to conduct a DIR.		X
7. If a DIR is not warranted, further evaluation and determination on the adequacy of compensatory measures will be made.		X
8. Conduct a DIR.		X
9. Review the DIR Findings Report.	X	X
10. Provide FEMA THD Director with a recommendation to support a reasonable assurance determination.	X	X
11. Reasonable assurance determination is issued.	X	

B. Delegation of Tasks

The following chart outlines the associated tasks to the key steps in conducting a DIR and the responsible position (or designee).

	Responsible Position			
Delegation of Tasks	**RAC Chair**	**FEMA Regional Admin**	**FEMA REP Branch Chief**	**FEMA THD Director**
1.1. *Notify* FEMA REP Branch Chief of impacting incident.	X			
2.1. Assist in *determining* the need for a DIR.	X	X	X	X
2.2. *Coordinate* communication with the respective NRC RSLO for determining the need for a DIR via conference call.	X			
3.1. *Communicate* recommendation for conducting a DIR to the FEMA Regional Administrator.	X			
3.2. *Communicate* recommendation for conducting a DIR to the FEMA REP Branch Chief.		X		
3.3. *Communicate* recommendation for conducting a DIR to the FEMA THD Director.			X	
4.1. *Facilitate* the communication between the FEMA REP Program and the NRC, via the designated NRC Branch Chief, regarding the decision-making process for a DIR determination.			X	
4.2. *Facilitate* the communication with the respective NRC RSLO, regarding the decision-making process for a DIR determination.	X			
5.1. Make a *final determination* on the need for a DIR.				X
5.2. *Communicate* DIR decision to the Assistant Administrator, FEMA National Preparedness Directorate (NPD).				X
5.3. *Communicate* DIR decision to NRC Director, NSIR/DPR.				X
5.4. *Communicate* DIR decision to National Watch Center (NWC).				X
6.1. *Establish* a schedule for conducting the DIR. The schedule should be established in consultation with OROs, the NRC, and the affected NRC Licensee.	X			

6.2. *Establish* the team responsible for conducting the DIR within 24 hours of the decision to conduct a DIR in accordance with the SOG.	X			
7.1. *Coordinate* further evaluation of offsite EP capabilities, including compensatory and alternative measures.	X			
8.1. *Coordinate* implementation of DIR Team and conduct of review.	X			
8.2. Ensure *routine progress updates* are provided by the DIR Team.	X			
8.3. *Communicate* with regional staff and ensure close communication with the ORO(s) officials regarding the condition of the EP infrastructure within the EPZ and reactor plant status. Provide updates to the respective NRC Regional State Liaison Officer.	X			
8.4. *Prepare* and *transmit* a DIR Findings Report (Appendix E) and recommendation of determination of reasonable assurance to the FEMA Regional Administrator for review.	X			
9.1. *Review* and *transmit* DIR Findings Report and recommendation of reasonable assurance to the FEMA REP Branch Chief for review; request additional input from RAC Chair if needed.		X		
9.2. *Review* DIR Findings Report and recommendation of reasonable assurance; request additional input from RAC Chair if needed.			X	
10.1. *Transmit* DIR Findings Report and recommendation of reasonable assurance to the FEMA THD Director for review.			X	
11.1. *Review* the DIR Findings Report and reason- able assurance determination; request additional input from the RAC Chair as needed.				X
11.2. *Provide* an initial reasonable assurance determination and the DIR Findings Report using a pre- approved template to the NRC Director, NSIR/DPR.				X

Appendix C: Regional Incident Response and Coordination Strategy

This strategy outlines recommended actions for maintaining situational awareness, promoting coordination with appropriate stakeholders, and following current guidance before and after a disaster impacts communities surrounding a nuclear power plant. The RAC Chair and the DIR Team may tailor and modify any of the recommendations or timeframes listed below. This strategy applies to events in which there is prior notice. For no notice events, the pre-impact items should be considered as appropriate and as soon as reasonably achievable.

Note: Timeframes delineated are suggested timeframes not necessarily requirements.

120 – 72 Hours Prior to Licensee Impact

REP Regional Office

Contact the appropriate Nuclear Regulatory Commission (NRC) Regional State Liaison Officer (RSLO) and/or licensee representative to understand their response plans and establish ongoing liaison protocol. Consider the issuance of Hurricane Advisory updates as an initiator for conference calls between the FEMA Region, NRC Region, licensee representative and applicable Offsite Response Organizations (OROs. Consider coordinating with the regional response division and regional leadership to further develop how a Disaster Initiated Review (DIR) will be conducted cooperatively if needed.

72 - 48 Hours Prior to Licensee Impact

REP Regional Office

Consider contacting appropriate State and County emergency management officials to communicate informational requirements that may be needed post impact. If possible, identify state and local points of contact who can assist with Preliminary Capability Assessments (PCA), as well as representatives who can participate in DIRs if needed.

48 – 0 Hours Prior to Licensee Impact

REP Regional Office

Identify DIR Teams including the RAC Chair (or designee), Site Specialist, and representatives from the NRC Regional Office, affected state and local offsite response organizations (ORO) as appropriate, and emergency planning staff from the licensee. Consider preparation of DIR Kits in accordance with Section VII of this SOG.

0 - 24 Hours Post Licensee Impact*

**This time may be adjusted based on the duration and severity of the disaster. Field assessments should only begin after the event has ended and conditions are relatively safe.*

REP Regional Office

Depending on the severity of the event for OROs, begin gathering information related to the 11 questions associated with a PCA. This should be an overview or snapshot assessment of offsite infrastructure and response capabilities. The REP Regional Office may obtain information from State and local response organizations, although careful consideration shall be given to their priorities and availability at this stage. The REP Regional Office may also gather information from FEMA response staff deployed to EOCs, state and local incident status reports, and RRCC staff. Coordinate with the NRC RSLO to identify nuclear power plant status and ascertain the licensee's expected timetable for restart if the plant was shut down based on the disaster.

24 – 48 Hours Post Licensee Impact

REP Regional Office

Depending on the severity of the event for OROs, provide the FEMA Regional Administrator, FEMA THD Director, FEMA REP Program Branch Chief, RRCC, respective OROs, and the NRC RSLO with an initial assessment of offsite impacts to infrastructure and response capabilities. The assessment should include a potential timeframe for restoration or implementation of compensatory measures, and an estimate of further offsite assessment requirements. The REP Regional Office can use the 11 questions used for a PCA as the basis of information gathered. Access to State and local emergency response staff may be limited immediately following a disaster, so consider all available information resources when developing an assessment. Many variables can affect the FEMA Region's ability to obtain this information, however, the REP Regional Office should coordinate with and get updates from the appropriate stakeholders regardless of the extent of information obtained. Provide the Regional Administrator an assessment status update or a recommendation for conduct of a DIR.

Ongoing

REP Regional Office

Continue to provide periodic capability assessment briefs to the FEMA Regional leader- ship, FEMA THD Director, FEMA REP Program Branch Chief, RRCC, respective OROs, and the NRC RSLO until it is mutually agreed they are no longer needed. Consider capability assessment results to develop a recommendation for the need and timing of a DIR. The FEMA THD Director, FEMA Regional Administrator, RAC Chair, and FEMA REP Program Branch Chief should conduct a conference call to determine the need for a DIR.

Appendix D: Preliminary Capabilities Assessment Checklist

The following list of questions is used in conducting a PCA. A fillable PDF checklist of these questions is available from the FEMA Region upon request.

Preliminary Capabilities Assessment (PCA) Checklist

- Has a local, State or Tribal Nation declared an emergency?
- Are offsite emergency response facilities operational? (I)
- Are communication systems operable? (II)
- Are Emergency Response Organizations (EROs), critical to support available? (III)
- Are Alert and Notification Systems operational? (IV)
- Is transportation available and facilities for people with disabilities and access/functional needs operational? (V)
- Are evacuation routes unimpeded? (VI)
- Are personnel, equipment, laboratory, transportation, and communication resources for accident assessments available? (VII)
- Are critical support facilities available? (VIII)
- Is there a disaster-related population change, and are resources to assist with evacuation of transport-dependent populations available? (IX)
- What compensatory measures have been put in place by local, State, Tribal, Governments, or NRC Licensee:
- What is the initial assessment of the infrastructure for the facility, state, and tribal and local Risk & Host Counties:
- Are the EPZ Counties and State capable of implementing protective actions?

Appendix E: Post-Disaster Assessment of Offsite Capabilities Checklists

The following lists of questions are used in conducting a DIR. A fillable PDF checklist of these questions is available from the FEMA Region upon request.

I. Emergency Response Facility

- Is the Emergency Response Facility operational?
- Is the Emergency Response Facility structurally safe?
- Is the Emergency Response Facility operating on primary power?
- Is the Emergency Response Facility operating on backup?
- What is the estimated schedule for the restoration of primary power:
- How many days of fuel on site:
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

II. Communications

- Is the dedicated phone line (Hot Ring Down from the Plant) available?
- If applicable, are the dedicated phone lines (decision/administrative) available?
- Are commercial telephones available?
- Are cellular telephones available?
- Is satellite communication available (if applicable)?
- Are State/Local government radios available?
- Are amateur radio systems available?
- Is there internet access?
- What other communication systems are available:
- If the primary and backup systems are inoperative, please obtain a schedule for repair and also discuss the contingency plans for communication:
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

III. Emergency Response Organizations

- As specified in the plan, are elected officials or other decision-makers available?
- As specified in the plan, is the emergency response organization (Emergency Management) available?
- As specified in the plan, is the emergency response organization (Public Information Officer) available?
- As specified in the plan, is the emergency response organization (law enforcement personnel) available?
- As specified in the plan, is the emergency response organization (Fire/Rescue personnel) available?
- As specified in the plan, is the emergency response organization (EMS/Medical personnel) available?
- As specified in the plan, are the education officials available?
- Are schools open?
- Are schools closed?
- As specified in the plan, are Social Services available?
- As specified in the plan, are Health Services available?
- As specified in the plan, are Agricultural Services available?
- As specified in the plan, what other departments and/or agencies are available?
- As specified in the plan, is the American Red Cross available?
- As specified in the plan, are amateur radio groups available?
- As specified in the plan, what other non-governmental volunteer organizations are available:
- As specified in the plan, what private organizations are available:
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

IV. Public Alerts and Notifications

- What is the total number of sirens:
- How many sires are operational:
- What percentage of sirens are operational:
- Are sirens on battery backup power?
- Attach siren restoration and testing plan:
- When is the expected completion date:
- Is the emergency alert system (EAS) available?
- Is the emergency alert system (EAS) on primary power?
- Is the emergency alert system (EAS) on backup power?
- Are NOAA and/or other tone alert radios available?
- Are other local TV and Radio stations available?
- List local TV and Radio stations:
- Are cable interrupt capabilities available?
- What is the percentage of service in the EPZ:
- Is the local telephone service operational?
- Are TDD and other devices for special needs populations available?
- What percentage of EPZ population is without power:
- What is the estimated restoration schedule:
- What are the number of back-up alerting routes in the EPZ:
- What back-up route alerting equipment is available:
- As specified in the plan, are back-up route alerting personnel available?
- Are information and evacuation route marker signs permanently placed?
- How many information and evacuation route marker signs are missing:
- Are replacement signs available?
- If replacement signs are unavailable, how many days to receive replacements:
- Is the Joint Information Center (JIC) available?
- Is the Joint Information Center (JIC) on primary power?
- List areas requiring follow-up:
- What Compensatory Measures in Effect:

V. Access/Functional Needs and Transportation Resources

- Are functional needs facilities in the EPZ (excluding schools) open?
- Have schools, including licensed day-care centers, reopened?
- Has the disaster impacted the ability to provide transportation resources?
- If yes, has the government instituted compensatory measures?
- Attach the government-instituted compensatory plan:
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

VI. Evacuation Routes

- Is there open and unrestricted access to evacuation routes?
- Have destroyed roads created a negative impact on evacuation?
- What is the number of passable lanes of the impacted evacuation route:
- Is there a problem with bridges?
- Identify the location of bridges impacting evacuation routes:
- Is/Are there bridge(s) which are closed to traffic?
- Is/Are there bridge(s) with minor damage and accessible?
- Is/Are there bridge(s) with major damage and non-accessible?
- Is/Are there non-functioning drawbridge(s)?
- What impact is there from damaged bridge(s) on evacuation route(s):
- Is the public allowed access to areas served by damaged bridge(s)?
- Is/Are there alternative method(s) for crossing waterways?
- What is the schedule for revising evacuation time estimates, if needed:
- What is the increase in evacuation time:
- If the traffic is being rerouted, what is the increased evacuation time:
- What is the estimated percent/number of population impacted by evacuation route problem:
- What is the percentage of reduced capacity:
- Is there public information on changes to evacuation routes available?
- What is the estimated time for restoration of planned evacuation routes:
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

VII. Accident Assessment Resources

- Are personnel to perform dose assessment calculations available?
- Are personnel for field monitoring teams available?
- Are personnel for laboratory operations available?
- Are personnel for sample transport and other support functions available?
- Is equipment for field monitoring available?
- Is equipment for mobile laboratory available?
- Is power for mobile laboratory available?
- Are communications to all field elements available?
- Do field teams have unrestricted access to monitoring and sampling locations?
- Are alternate means identified to reach monitoring/sampling locations?
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

VIII. Support Services

- Are planned reception center facilities available?
- Is there staff available to operate the reception center facilities?
- Is evacuee monitoring equipment available?
- Are planned emergency worker decontamination facilities available?
- Is there staff available to operate the emergency worker decontamination facilities?
- Is emergency worker decontamination equipment available?
- Are planned temporary care facilities available?
- Is there staff available to operate the temporary care facilities?
- Is temporary care equipment available?
- Is the hospital designated to treat radiological contaminated patients open?
- List areas requiring follow-up:
- What Compensatory Measures in Effect:

IX. Population Shifts

- Is there a disaster related population change in the 10-mile EPZ?
- Is there a temporary population increase in the 10-mile EPZ, after reentry?
- What is the estimated population increase within the 10-mile EPZ:
- Is there a temporary population decrease in the 10-mile EPZ, after reentry?
- What is the estimated population decrease within the 10-mile EPZ:
- Is there a temporary housing area developed within the 10-mile EPZ?
- Have notification procedures been developed for the temporary housing area? (attach procedures)
- Have resources been identified to assist with evacuation, if needed?
- Have plans been developed for transport dependent population?
- Is there a permanent change in population within the 10-mile EPZ?
- Is the permanent change in population greater than 10% of the total population?
- List areas requiring follow-up:
- What Compensatory Measures are in Effect:

Appendix F: Report Guidelines Memorandum/Letter

The following templates are provided for use in developing a PCA or DIR Report Memorandum.

PCA Report Guidelines Memorandum

Preliminary Capabilities Assessment

Date

MEMORANDUM FOR: _____, Director
Technological Hazards Division
National Preparedness Directorate
U.S. Department of Homeland Security-FEMA

ATTENTION: _____, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
National Preparedness Directorate
U.S. Department of Homeland Security-FEMA

FROM: Regional Technological Hazards Branch Chief/RAC Chair
[*include name, title, and location*]

SUBJECT: Preliminary Capabilities Assessment – [NUCLEAR POWER PLANT]

Background:

List event/date/time and affected nuclear power plant. Provide a description of the event; effects on the plant (onsite and offsite) and a shutdown timeline; list impacted risk and support jurisdictions (parish/county).

Include the dates of the review and a brief statement of the FEMA Region, State, Tribal and local government agencies, NRC Licensee and other Federal Agency representatives involved in conducting the assessment.

On [DATE], based on the Preliminary Capabilities Assessment (PCA) performed, our review of available information gathered in discussions with State, tribal, and local government agencies, Region [___] has concluded that offsite radiological emergency preparedness remains adequate to provide a reasonable assurance determination and that appropriate measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the [NUCLEAR POWER PLANT]. At this time, Region [___] is not recommending actions to conduct a Disaster

Initiated Review of offsite emergency preparedness issues within the [NUCLEAR POWER PLANT] 10-mile emergency planning zone.

Assessment: For all areas: Include information on areas requiring follow-up actions and provide information on any compensatory measures that are in effect.

1. Emergency Response Facilities

Summarize findings for off-site facilities using the Post Disaster Assessment of Off-Site Capabilities as a guide.

2. Communications

Summarize findings for communications using the Post Disaster Assessment of Off-Site Capabilities as a guide.

3. Emergency Response Organizations

Summarize findings for emergency response organizations using the Post Disaster Assessment of Off-Site Capabilities as a guide.

4. Public Alert and Notification

Summarize findings for public alert and notification using the Post Disaster Assessment of Off- Site Capabilities as a guide.

5. Access and Functional Needs and Transportation Resources

Summarize findings for special needs and transportation resources using the Post Disaster Assessment of Off-Site Capabilities as a guide.

6. Evacuation Routes

Summarize findings for evacuation routes using the Post Disaster Assessment of Off-Site Capabilities as a guide.

7. Accident Assessment

Summarize findings for accident assessment using the Post Disaster Assessment of Off-Site Capabilities as a guide.

8. Support Services

Summarize findings for support services using the Post Disaster Assessment of Off-Site Capabilities as a guide.

9. Population Shifts

If there has been a population shift due to the incident, include detailed information on the population shift.

10. Supporting Documentation

Supporting documentation may be gathered in the course of the assessment. While it is necessary to maintain this documentation on file, it is not required to be submitted with the report. A statement should be made to the effect that "All supporting documentation gathered by the Review Team will be on file at the [___] Region."

Conclusions:

Summarize the findings of the Review Team. Make a specific recommendation with regard to providing a determination of the necessity of the performance of a DIR to the Nuclear Regula- tory Commission (NRC).

DIR Report Guidelines Memorandum

Disaster Initiated Review

Date

MEMORANDUM FOR: _____, Director
Technological Hazards Division
National Preparedness Directorate
U.S. Department of Homeland Security-FEMA

ATTENTION: _____, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
National Preparedness Directorate
U.S. Department of Homeland Security-FEMA

FROM: Regional Technological Hazards Branch Chief/RAC Chair
[*include name, title, and location*]

SUBJECT: Preliminary Capabilities Assessment – [NUCLEAR POWER PLANT]

Background:

List event/date/time and affected nuclear power plant. Provide a description of the event; effects on the plant (onsite and offsite) and a shutdown timeline; list impacted risk and support jurisdictions (parish/county).

Include the dates of the review and a brief statement of the FEMA Region, State, Tribal and local government agencies, NRC Licensee and other Federal Agency representatives involved in conducting the assessment.

Assessment: For all areas: Include information on areas requiring follow-up actions and provide information on any compensatory measures that are in effect.

1. Emergency Response Facilities

Summarize findings for off-site facilities using the Post Disaster Assessment of Off-Site Capabilities as a guide.

2. Communications

Summarize findings for communications using the Post Disaster Assessment of Off-Site Capabilities as a guide.

3. Emergency Response Organizations

Summarize findings for emergency response organizations using the Post Disaster Assessment of Off-Site Capabilities as a guide.

4. Public Alert and Notification

Summarize findings for public alert and notification using the Post Disaster Assessment of Off- Site Capabilities as a guide.

5. Access and Functional Needs Transportation Resources

Summarize findings for special needs and transportation resources using the Post Disaster Assessment of Off-Site Capabilities as a guide.

6. Evacuation Routes

Summarize findings for evacuation routes using the Post Disaster Assessment of Off-Site Capabilities as a guide.

7. Accident Assessment

Summarize findings for accident assessment using the Post Disaster Assessment of Off-Site Capabilities as a guide.

8. Support Services

Summarize findings for support services using the Post Disaster Assessment of Off-Site Capabilities as a guide.

9. Population Shifts

If there has been a population shift due to the incident, include detailed information on the population shift.

10. Supporting Documentation

Supporting documentation may be gathered in the course of the review. While it is necessary to maintain this documentation on file, it is not required to be submitted with the report. A statement should be made to the effect that "All supporting documentation gathered by the Review Team will be on file at the [___] Region."

Conclusions:

Summarize the findings of the Review Team. Make a specific recommendation with regard to providing a reasonable assurance determination to the Nuclear Regulatory Commission (NRC).

Continued Reasonable Assurance Letter Templates

Continued Reasonable Assurance

Date

Director
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission Mail Stop T4D22A
Washington, D.C. 20555

Dear [_____]:

This letter is to inform you that the Federal Emergency Management Agency (FEMA) has completed its Disaster Initiated Review (DIR) of the [STATE(S)] and local offsite response organizations continued capability to adequately respond to an incident at the [NUCLEAR POWER PLANT] following [IMPACTING INCIDENT] that affected 10-mile Emergency Planning Zone communities' communication capabilities, Emergency Operations Center functionality, and possibly blocked evacuation routes.

On [DATE], a comprehensive investigation and collection of field data was performed by the joint FEMA/Nuclear Regulatory Commission DIR Team, in accordance with FEMA's Post Disaster Assessment of Offsite Capabilities procedure.

Based on the review of all of this information, FEMA concludes that offsite radiological emergency preparedness is adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the [NUCLEAR POWER PLANT]. At this time, FEMA is not aware of any unresolved offsite emergency preparedness issues around [NUCLEAR POWER PLANT], and therefore, we have no objections to plant startup and full-power operations.

Please contact me at [THD DIRECTOR PHONE NUMBER], if you have any questions or re- quire any further assistance on this matter.

Sincerely,

Director
Technological Hazards Division

Appendix G: Abbreviations and Acronyms

ANS	Alert and Notification Systems
CFR	Code of Federal Regulations
DHS	Department of Homeland Security
DIR	Disaster Initiated Review
DPR	Division of Preparedness and Response
DRP	Division of Reactor Projects
DRS	Division of Reactor Safety
EAS	Emergency Alert System
EMS	Emergency Medical Services
EP	Emergency Preparedness
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
FIOPs	Federal Interagency Operational Plans
FOIA	Freedom of Information Act
GETS	Government Emergency Telephone System
GPS	Global Positioning System
HERO	Headquarters Emergency Response Officer
HOO	Headquarters Operations Officer
HQ	Headquarters
IMC	Inspection Manual Chapter
ISFSI	Independent Spent Fuel Storage Installations
JIC	Joint Information Center

MC	Manual Chapter
MOU	Memorandum of Understanding
NOAA	National Oceanic and Atmospheric Administration
NOED	Notice of Enforcement Discretion
NPD	National Preparedness Directorate
NPP	Nuclear Power Plant
NPS	National Preparedness System
NRC	Nuclear Regulatory Commission
NRCC	National Response Coordination Center
NRIA	Nuclear/Radiological Incident Annex
NRR	Office of Nuclear Reactor Regulation
NSIR	Office of Nuclear Security and Incident Response
NWC	National Watch Center (FEMA)
OGC	Office of the General Counsel
OPR	Office of Primary Responsibility
ORLOB	Operating Reactor Licensing and Outreach Branch
ORO	Offsite Response Organization
PA	Preparedness Assessment
PCA	Preliminary Capabilities Assessment
PPD	Presidential Policy Directive
RAC	Radiological Assistance Committee
REP	Radiological Emergency Preparedness
RRCC	Regional Response Coordination Center
RSLO	Regional State Liaison Officer

SOG	Standard Operating Guidelines
THD	Technological Hazards Division

Appendix H: Definitions

Adequate: As used in reviews of radiological emergency response plans/procedures, adequate means that the plan/ procedure contents are consistent and in full compliance with the requirements delineated in the Planning Standards and associated NUREG-0654/FEMA-REP-1 Evaluation Criteria or alternative approaches approved by FEMA.

Coordinate: To bring into common action so as not to unnecessarily duplicate or omit important actions (does not involve direction of one agency by another).

Disaster: A disaster is a serious disruption occurring over a short or long period of time that causes widespread human, material, economic or environmental loss which exceeds the ability of the affected community or society to cope using its own resources.

Disaster Initiated Review: Process used to follow a significant natural disaster or event to formally determine the offsite emergency response infrastructure and capabilities to effectively implement approved offsite REP plans by State and local authorities. A DIR is not intended to be a comprehensive review of offsite plans and preparedness.

Emergency Planning Zone: A geographic area surrounding a commercial nuclear power plant for which emergency planning is needed to ensure that prompt and effective actions can be taken by offsite response organizations to protect the public health and safety in the event of a radiological accident. The plume pathway EPZ is approximately 10 miles in radius, while the ingestion pathway EPZ has a radius of approximately 50 miles.

Facility: Any building, center, room(s), or mobile unit(s) designed and equipped to support emergency operations.

Incident: An occurrence, natural or man-made, that requires a response to protect life or property. Incidents can include major disasters, emergencies, terrorist attacks, terrorist threats, civil unrest, wildland and urban fires, floods, hazardous materials spills, nuclear accidents, aircraft accidents, earthquakes, hurricanes, tornadoes, tropical storms, tsunamis, war-related disasters, public health and medical emergencies, and other occurrences requiring an emergency response.

Licensee: The utility or organization that has applied for or has received from the Nuclear Regulatory Commission (1) a license to construct or operate a commercial nuclear power plant, (2) a possession-only license for a commercial nuclear power plant, with the exception of licensees that have received an NRC-approved exemption to 10 CFR § 50.54(q) requirements, (3) an early site permit for a commercial nuclear power plant, (4) a combined construction permit and operating license for a commercial nuclear power plant, or (5) any other NRC license that is now or may become subject to requirements for offsite radiological emergency planning and prepared- ness activities.

Offsite: Beyond the boundaries of the owner-controlled area around a commercial nuclear power plant.

Offsite Response Organization: Any State, local, and Tribal government; supporting private industry and voluntary organizations; and Licensee offsite response organizations (that are formed when State, local, and Tribal governments fail to participate in the REP Program) that are responsible for carrying out emergency functions during a radiological emergency.

Operational: Status of a facility (e.g., emergency operations center, emergency operations facility, media center, assistance center, emergency worker center, laboratory, etc.) when all key decision makers, as identified in plans/ procedures, are at their duty stations and capable of performing all emergency functions assigned to that facility.

Plans/Procedures: An organization's documented concept of operations and implementing procedures for managing its internal response to emergencies and coordinating its external response with other organizations. The term plans/procedures as used in this manual includes radiological emergency preparedness/response plans, associated implementing procedures such as Standard Operating Guides, and other supporting and referenced materials, all of which are subject to review. The generic term plans/ procedures are used specifically for flexibility. Procedures may be either incorporated in the main plans or into separate procedural documents at the discretion of the offsite response organization.

Preliminary Capability Assessment: Process used to obtain a prompt assessment (situational report) of offsite EP immediately following a natural disaster or event to assist in the joint determination by the affected FEMA Region(s) and FEMA Headquarters REP Program on the need and timing for a DIR.

Preparedness Assessment: Process used to support the continued monitoring and evaluation of offsite emergency response capabilities and assess the impact of proposed state/local compensatory measures for unusual situations, such as local, state, or tribal government-driven budget shutdowns, national public health emergencies, etc.

Radiological emergency: A type of radiological incident that poses an actual or potential hazard to public health or safety or loss of property.

Reasonable Assurance: A determination that State, local, Tribal, and utility offsite plans and preparedness are adequate to protect public health and safety in the emergency planning areas of commercial nuclear power plants.

REP Branch Chief: FEMA Headquarters individual responsible for implementation of the national Radiological Emergency Preparedness Program.