

Comments submitted by OROs electronically

1.0 State of Ohio

Thank-you for the opportunity to comment on the topic of "fast breaker". Ohio Emergency Management submitted comments in 1999 on FEMA Initiative 1.1e Emergency Notification and Public Information as follows:

Criteria 5.z.2 (Alerting the public for a "fast breaking" event): The Ohio Emergency Management Agency (Ohio EMA) does not believe (approximately 15 minutes) is a viable time frame for notifying the public in a fast breaking event i.e. General Emergency with a release imminent or in progress. The protective action would be evacuation unless conditions in the county preclude timely evacuation. The Ohio EMA contends that the time frame for this information to be disseminated to the public should be "as quickly as possible". There needs to be sufficient time to coordinate the protective action between local and state officials as well as between states (Beaver Valley Power Station impacts three states) in addition to the initiation of such activities as waterway evacuation, closing of parklands, rail and air restrictions, and animal advisories. Also the infrastructure needs to be established to accommodate the public such as activation of care centers, reception centers, monitoring and decontamination centers, traffic control points etc. It is difficult to comprehend a local dispatcher (the likely individual to conduct these activities after hours) being comfortable taking the necessary actions without having sufficient time to properly coordinate these actions with other county and state officials. It is unfair to local governments who may have to implement such actions with personnel who may be unfamiliar with their impact on local citizens. It is unrealistic to think that government can react in this manner.

The Ohio EMA recommends a workshop of appropriate constituents to discuss and evaluate this criteria further with FEMA. This is certainly a vital objective but it needs to be accomplished in a prudent and effective manner.

The Ohio EMA continues to support the above comments submitted in 1999.

All radiological plans and procedures should be required to address actions that would be taken in the event of a fast breaker.

2.0 State of Michigan

Subject: Comments for the February 20, 2002 Meeting to Discuss Fast-Breaking Scenario Evaluation

I was first informed of the meeting to discuss "Exercise Evaluation Methodology and Alert and Notification System-related Issues" by a representative of one of the nuclear power plants in Michigan on February 5, 2002. The meeting notice I later obtained indicates that "States...will participate in the meeting." If this was truly the intent, more lead time is needed to allow for representative attendance. Due to the short notice, the following comments are provided for your consideration in lieu of our participation in the meeting. The five primary EPZ local jurisdictions in Michigan, Allegan County, Berrien County, Monroe County, Van Buren County, and Wayne County, have concurred with the position stated below. Wayne County has provided additional input, which is attached.

Attachment 2

We fully agree that the fast-breaking scenario and subsequent public notification are of utmost importance in protecting the health and safety of the public. Procedures to implement immediate action have been in place since the inception of the nuclear power plant offsite preparedness program in Michigan in 1980. Our process for fast-breaking events, which is handled entirely at the local government level, involves six steps following notification from the affected plant to local government that a General Emergency has been declared and that public protective actions are being recommended:

- verification with the plant that the message is authentic;
- notification of a public official from the pre-designated command and control line of succession;
- authorization to sound sirens and issue an EAS message;
- activation of the siren system;
- issuance of a message to the EAS station; and
- verification that the message has been received in its entirety and is understood.

As originally proposed by FEMA, these six steps would need to be completed within 15 minutes of notification from the plant. While there is great urgency to issue the public warning and evacuation order as quickly as possible, we disagree with the use of a 15-minute time limit for completion. We suggest that the focus be placed on verification of authenticity and on accuracy of information as opposed to an arbitrary 15-minute time frame. If 20 minutes are needed to ensure that the message is not a hoax or that the correct areas are identified in the EAS message, this is of far greater importance than the additional 5 minutes spent to avoid an unnecessary public evacuation. Personnel respond in the manner in which they have been trained; we need to focus our training on the right target.

We offer the following recommendations with respect to evaluation of this capability by Federal officials:

1. Do not stipulate a specific time frame. The language “with a sense of urgency and without undue delay” is far more appropriate and allows for adequate checks to be taken based on conditions at the time a plant recommendation is received.
2. Do not require “unannounced” demonstrations. Sheriff dispatch personnel in Michigan are responsible for performing fast-breaking scenario warning actions. These are the same personnel who operate 9-1-1 emergency call centers and dispatch law enforcement, fire, ambulance, and other emergency personnel to respond every-day, life-threatening events. They are well-trained, capable professionals. The disruption of their assigned responsibilities during an unannounced drill is not acceptable. Any delay of actual event response cannot be tolerated; unannounced drills introduce just such a possibility.
3. The best method of assessing the capability to respond to a fast-breaking scenario is via tabletops and scheduled drills to train responsible personnel. These formats allow discussion of issues only considered by one of many personnel assigned to implement these actions, thereby allowing the whole group to benefit.
4. Do not formally evaluate the fast-breaking capability via the typical standard exercise format, which only provides a snapshot of the actions taken by one person. It would be far more beneficial to document participation of responsible staff in an annual tabletop or drill, which could be observed by FEMA to gauge effectiveness of the training, not the performance of one responder. This format would allow the emphasis to be placed on the organization, where it rightfully belongs, not on a specific individual.

Thank you for the opportunity to comment.

3.0 Wayne County, Michigan

Wayne County concurs with the State's position as set forth in your e-mail correspondence dated 2/13/02 at 03:09 PM.

I would add that Wayne County's warning point is also responsible for public safety communications at Detroit Metropolitan Wayne County International Airport (a/k/a Metro Airport). As you know, public safety and homeland defense situations are constantly occurring at Metro Airport, and take precedence over everything else. By only using routine staff levels it could possibly take hours to fit in a 15-minute exercise demonstration. We will, therefore, need for the exercise demonstration to be prescheduled sufficiently in advance to allow us to arrange for extra on-duty personnel to handle non-essential duties like the demonstration.

You should also include a warning that unannounced officials may not be given access to the communications center (or even the building) if the FAA issues security restrictions associated with an Aviation Security (AVSEC) Level 4 Alert - something which the FAA has done many times in the past. Sometimes, when such Alerts are in effect, even people who work in our building have trouble getting through the front gate. That's just the way it is nowadays, and I don't want our good friends in FEMA to get surprised.

(Please note, several other Michigan OROs also e-mailed support for the State comments.)