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U.S. Department of Homeland Security
99 High Street, 5th Floor
Boston, MA 02110



FEMA

September 9, 2004

Albert Lewis, Director
Vermont Emergency Management Agency
Department of Public Safety
Waterbury State Complex
103 South Main Street
Waterbury, VT 05671

Dear Director Lewis:

In compliance with NUREG-0654, FEMA REP-1, Rev. 1, Region I staff evaluated an Alternate Joint News Center (JNC) Drill involving offsite response to a simulated incident at the Vermont Yankee Nuclear Power Station. The purpose of the drill was to test the capabilities of the Alternate JNC, located at Landmark College in Putney, Vermont.

Enclosed is a copy of the final report for the August 19, 2004, Alternate JNC Drill of the offsite radiological emergency plans for Vermont Yankee Nuclear Power Station in Brattleboro, Vermont. This report addresses the evaluation of the plans and preparedness for the States of Vermont and New Hampshire and the Commonwealth of Massachusetts. The final exercise report was prepared by the Federal Emergency Management Agency, Region I staff.

There were no Deficiencies or Areas Requiring Corrective Action (ARCA) identified during the August 19, 2004, drill.

If you have any questions, please contact Deborah S. Bell, RAC Chair at (617) 832-4744 or Deborah.Bell@DHS.GOV.

Sincerely,

Kenneth L. Horak
Acting Regional Director

Enclosure

CC: Lew Stowell, VEMA
Linda Lecuyer, MEMA
Mike Nowaj, NH BEM
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Robert Bores, NRC
Pat Tenorio, FEMA

Vermont Yankee Nuclear Power Station

Alternate Joint News Center– Landmark College, Putney, Vermont

Licensee: Entergy – Vermont Yankee

Exercise Date: August 19, 2004

Report Date: September 9, 2004



FEMA

**DEPARTMENT OF HOMELAND SECURITY
EMERGENCY PREPAREDNESS AND RESPONSE
FEDERAL EMERGENCY MANAGEMENT AGENCY
REGION I
99 HIGH STREET
BOSTON, MASSACHUSETTS 02110**

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Landmark College
Putney, Vermont

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I. EXECUTIVE SUMMARY

On August 19, 2004, an Alternate Joint News Center (JNC) Drill was conducted with the State of Vermont, the State of New Hampshire and the Commonwealth of Massachusetts in Putney, Vermont. The purpose of this drill was to assess The State of Vermont, The State of New Hampshire and The Commonwealth of Massachusetts, response at the Alternate JNC, to a radiological incident involving the Vermont Yankee Nuclear Power Station.

This drill was held in accordance with FEMA's policies and guidance concerning the exercise of State and local radiological emergency response plans (RERP) and procedures.

FEMA wishes to acknowledge the efforts of the many individuals who participated in this drill. Protecting the public health and safety is the full-time job of some of the drill participants and an additional assigned responsibility for others. This report contains the final evaluation of the Alternate JNC Drill.

The State of Vermont, the State of New Hampshire and the Commonwealth of Massachusetts personnel demonstrated knowledge of their emergency response plans and procedures. There were no deficiencies and no areas requiring corrective action (ARCA) identified as a result of this drill.

II. INTRODUCTION

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all off-site nuclear planning and response. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

FEMA Rule 44 CFR 350 establishes the policies and procedures for FEMA's initial and continued approval of Tribal, State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local government participation in joint exercises with licensees.

FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- Taking the lead in off-site emergency planning and in the review and evaluation of RERPs and procedures developed by State and local governments;
- Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Commerce,
 - U.S. Nuclear Regulatory Commission,
 - U.S. Environmental Protection Agency,
 - U.S. Department of Energy,
 - U.S. Department of Health and Human Services,
 - U.S. Department of Transportation,
 - U.S. Department of Agriculture,
 - U.S. Department of the Interior, and
 - U.S. Food and Drug Administration.

Representatives of these agencies serve on the FEMA Region I Regional Assistance Committee (RAC), which is chaired by FEMA.

An Alternate JNC Evaluated Drill was conducted on August 19, 2004, by DHS-FEMA Region I, Radiological Emergency Preparedness Program (REP) Staff to assess the adequacy of The State of Vermont, The State of New Hampshire and the Commonwealth of Massachusetts Alternate JNC staff, procedures, facilities, equipment, and personnel for the Alternate JNC as a result of a Vermont Yankee Nuclear Power Station incident. The purpose of this drill report is to present the drill results and findings on the performance of the offsite response organizations (ORO) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region I RAC Chairperson, and approved by the Regional Director.

The criteria utilized in the FEMA evaluation process are contained in:

- 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," November 1980;
- "Radiological Emergency Preparedness: Exercise Evaluation Methodology," published in the Federal Register on September 12, 2001, and amended April 25, 2002.

Section III of this report, entitled "Drill Evaluation and Results," presents information on the demonstration of applicable exercise criteria at the Alternate JNC, located at Landmark College in Putney, Vermont in an issues-only format. This section also contains, if applicable: (1) descriptions of all Deficiencies and Areas Requiring Corrective Action (ARCA) assessed during this exercise, recommended corrective actions, and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs' efforts to resolve them.

III. DRILL EVALUATION AND RESULTS

Participating Agencies:

State of Vermont

State of New Hampshire

Commonwealth of Massachusetts

The following participated, but were not evaluated by FEMA:

Nuclear Information Director and the Alternate JNC staff from Entergy Nuclear Vermont Yankee Power Station

Contained in this section are the results and findings of the evaluation of the Alternate JNC Drill conducted on August 19, 2004. The purpose of this evaluated drill was to test the readiness capabilities of The States of Vermont, New Hampshire and the Commonwealth of Massachusetts to be able to respond at the Alternate JNC in response to an incident at the Vermont Yankee Nuclear Power Station.

Each functional entity was evaluated on the basis of its demonstration of criteria delineated in the exercise criterion contained in the "Radiological Emergency Preparedness: Exercise Evaluation Methodology," published in the Federal Register on September 12, 2001, and amended April 25, 2002.

The following is the status of functional entities evaluated.

**State of Vermont
State of New Hampshire
Commonwealth of Massachusetts**

The acoustics at the Alternate JNC were exceptional. Staff was audible from any location in the Alternate JNC. The facility was setup and operated according to the plan. All necessary equipment was available and operated successfully. The States demonstrated a joint effort. All three States worked well together to ensure the simulated media heard a one-voice message.

- (a) MET: Criterion 1.b.1, Criterion 1.d.1, Criterion 1.e.1**
- (b) DEFICIENCIES: NONE**
- (c) AREAS REQUIRING CORRECTIVE ACTION (ARCA): NONE**
- (d) NOT DEMONSTRATED: NONE**
- (e) PRIOR ARCAs RESOLVED: NONE**
- (f) PRIOR ARCAs UNRESOLVED: NONE**

APPENDIX 1

DRILL EVALUATORS

The following is a list of the personnel who evaluated the Alternate Joint News Media Center for the Vermont Yankee Nuclear Power Station on August 19, 2004.

<u>EVALUATION SITE</u>	<u>CRITERION</u>	<u>EVALUATOR</u>	<u>ORGANIZATION</u>
Alternate JNC	1.b.1-Facilities are sufficient to support the emergency response.	Robert Poole	FEMA Region I
	1.d.1- Communications Equipment	Wanda Gaudet	FEMA Region I
	1.e.1- Equipment and Supplies to Support Operations	Wanda Gaudet	FEMA Region I

APPENDIX 2

EXTENT OF PLAY

DRILL PLANNING FORM

Type of Drill: Alternate Joint News Center **Date of Drill:** August 19, 2004

Location of Drill: Alternate Joint News Center, Putney VT.

Participants: Public Information Officers from the State of Vermont, State of New Hampshire, Commonwealth of Massachusetts, Nuclear Information Director & the Alternate JNC staff from Entergy Nuclear Vermont Yankee

1. Description of Drill:

a. Drill Objectives / Extent of Play

The revised Extent of Play (based on FEMA comments) was submitted to FEMA on June 29, 2004. The Scenario specific extent of play for the applicable FEMA Evaluation Criteria is as follows:

EVALUATION AREA 1: EMERGENCY OPERATIONS MANAGEMENT

Sub-element 1.a – Mobilization

Criteria 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654, A.4, D.3, 4, E.1, 2, H.4)

SCENARIO SPECIFIC EXTENT OF PLAY:

NOT APPLICABLE. The Alternate JNC staff will be pre positioned at the Alternate JNC for a pre drill briefing.

Sub-element 1.b – Facilities

Criteria 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654, H)

SCENARIO SPECIFIC EXTENT OF PLAY:

The Alternate JNC will be fully set up as it would be to support an actual emergency. This would include the availability of telephones and other equipment as required for response to an emergency.

The capability for back up power through a contracted service will be discussed. Also, a discussion will be provided on what equipment is stored at the Alternate JNC and what is transported to the facility. Whether or not the facility is activated on a standby bases or activated as needed will be discussed.

Sub-element 1.d – Communications Equipment

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations. (NUREG-0654, F.1., 2.)

SCENARIO SPECIFIC EXTENT OF PLAY:

The ability to receive copies of the press releases and EAS messages by fax and to communicate by landline with the three State EOCs and the EOF will be demonstrated. Backup communication capability (cell phones) will be demonstrated.

Sub-element 1.e – Equipment and Supplies to Support Operations

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654, H., J.10.a.b.e.f.j.k., 11, K.3.a.)

SCENARIO SPECIFIC EXTENT OF PLAY:

The Alternate JNC is outside the 10 mile EPZ. The capability for personnel dosimetry (permanent record dosimeter only e.g. TLD) for Alternate JNC personnel will be demonstrated. The State JNC personnel arriving at the Alternate JNC will have emergency worker personal dosimeters issued in accordance with the State Plans and Procedures under the assumption that they would be located at the JNC in Brattleboro, which is within the 10 mile EPZ.

Use of maps and other displays will be demonstrated.

The access control and security for the facility will be demonstrated or discussed as appropriate.

APPENDIX 3

Scenario

Scenario Narrative Summary

Note: All technical data on the incident are contained in the Message cards.

The drill will commence with a pre-drill briefing, by the Alternate JNC Controller to all participants at the Alternate JNC, on scenario events in progress up to the Site Area Emergency and the activation of the JNC. Copies of previously issued press releases and EAS messages will be provided. It will then be simulated that the Media Briefing function of the JNC is relocated to the Alternate JNC because of degrading plant conditions, changing wind direction etc.

The Alternate JNC drill will then commence when the General Emergency Press releases and EAS messages prepared at the EOF and the State EOC are faxed to the Alternate JNC. The Alternate JNC staff will demonstrate communications back to the State EOC and EOF as they prepare for the media briefing.

A Media Briefing session will be demonstrated complete with questions from the mock media to demonstrate facility capability.

There will be no demonstration of Public Inquiry (rumor control) as all of this will be simulated if necessary by the Control Cells.

c. Scenario Timeline

All times provided below are approximate.

Scenario Time for 04/08/2003	Clock Time for 08/19/2004	Event	Messages
NA	10:00	Alternate JNC pre drill briefing starts	AJNC-M-1
0820	10:00	Unusual Event declared owing to an earthquake. A derailed railroad tanker car in Vernon about 2 miles north of the plant is leaking what might be toxic and corrosive gas. Plant is at 100 % power	
09:05	10:00	Alert declared owing to the presence of toxic and corrosive	

Scenario Time for 04/08/2003	Clock Time for 08/19/2004	Event	Messages
		gas in the area of the plant's intake structure. Plant begins to reduce power.	
0930	1000	Gas leak determined to be from nitrogen car, non toxic.	
10:04	10:00	Site Area Emergency declared another earthquake (between 7 and 8 on the Modified Mercalli scale) causes a plant auto and manual scram and all control rods are not inserted. Reactor Power is greater than 2 %. Wind is from the NW (321degrees) at 6 mph.	
10:10	10:00	Joint News Center in Brattleboro is activated	
10:15	10:00	Commonwealth of MA declares a State of emergency	
10:23	10:00	State of NH declares a State of Emergency	
10:25	10:00	State of VT declares a State of Emergency	
10:20	10:00	First media briefing done at JNC	
11:12	10:00	First EAS Message to be issued NOAA and siren sounding at 11:22 scenario time	
11:20	10:00	Second Media briefing at JNC	
11:20	10:20	Direction to relocate the Media Briefing from JNC to Alternate JNC given by the VY EOF because weather forecast indicates wind direction will switch from north to south within the next 2 to 3 hours. Relocation completed.	
11:24	10:25	General Emergency Declared and plant condition PAR issued by Vermont Yankee. Wind is from the NW (315 degrees) at 6 mph. Radiation releases are underway.	
	10:30 or after	Pre drill briefing ends and the	AJNC-M-2

Scenario Time for 04/08/2003	Clock Time for 08/19/2004	Event	Messages
	briefing is over	Alt JNC drill starts	
12:10	10:35 or after drill starts	FAX from State EOC Control Cells with EAS message issue with NOAA and siren sounding at 1220 scenario time News releases Fax received from Control cells	CCVTEOC-M-1 CCNHEOC-M-1 CCMAEOC-M-1 CCVYEOF-M-1
	1035 to 11:00	Communications with State EOC and ENVY EOF demonstrated	
	11:00	Media Briefing starts	
	11:20	Media Briefing ends	
	11:30	Demonstration ends unless FEMA has questions / issues	

* AJNC= Alternate Joint News Center; CCVTEOC = Control Cell VT EOC: CCNHEOC= Control Cell NH EOC: CCMAEOC= Control Cell MA EOC: CCENVYEOF= Control Cell VY EOF.