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

FEMA

March 3, 2023

Mirela Gavrilas, Ph.D.,
Director, Office of Nuclear Security
and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: FEMA approval of Alert and Notification system design Report for constellation Midwest offsite response Organizations

Dear Dr. Gavrilas:

I am in receipt of your letter, dated January 10, 2023, requesting information regarding previous approvals to use the Integrated Public Alert and Warning System (IPAWS) at several nuclear power plants in the State of Illinois. Based on my staff's review of the relevant documentation, please find details of the approvals herein.

The Federal Emergency Management Agency (FEMA) approved replacement of route alerting with IPAWS as the backup alert and notification system (ANS) for Clinton Power Station, Braidwood Generating Station, Dresden Generating Station, Quad Cities Generating Station, LaSalle County Generating Station, and Byron Generating Station. FEMA Region 5 issued individual approvals for each site during the period 2016-2019.

These approvals were consistent with FEMA guidance in place at the time for FEMA Radiological Emergency Preparedness (REP) Program approval of IPAWS. Revised state plans reflecting replacement of route alerting with IPAWS were submitted for each site to FEMA Region 5, which conducted a review of the documentation and determined it satisfied the requirements for ANS. FEMA Region 5 then issued state plan approval letters to the State of Illinois. It is important to note that there were no design reports reflecting these changes and that changes were not verbally approved. Additionally, it is our understanding that the offsite response organizations (OROs) are using IPAWS-Wireless Emergency Alerts as their independent backup ANS; however, discrepancies between State and county plans were recently identified that include route alerting as an additional back-up method in one or more county's plans, which is being resolved.

FEMA guidance in place during this period determined IPAWS adoption to be a *non-significant* change. Based on the guidance in place at the time, such changes were reviewed and approved by the FEMA Region. FEMA Headquarters (HQ) and the U.S. Nuclear Regulatory Commission (NRC) were not included in the process.

Following these approvals, a revised REP Program Manual was issued in December 2019. Part V of this manual matured the process for approval of revised ANS. The REP Program manual now communicates the need to submit an updated ANS evaluation report (design report) as well as the necessary elements to document in the report when changing the systems used to alert and notify the public. FEMA currently recognizes replacement of one complete alert and notification capability with a different capability to be a significant change, which requires FEMA HQ approval of the design report and NRC acceptance of that design report.

FEMA values its partnership with the NRC to ensure community preparedness for emergencies involving nuclear power plants. We look forward to continued collaboration to maintain a high level of safety in our communities. If you have any additional questions please contact Bruce Foreman, Acting Director, Technological Hazards Division at (202) 304-5399.

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Damon C. Penn
Assistant Administrator (Acting)
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