



NUCLEAR ENERGY INSTITUTE

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July 25, 2011

Mr. Brian J. McDermott
Director for Incident Response
Office of Nuclear Security and Incident Response
Division of Preparedness and Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Transmittal of Revised Hostile Action-Based Exercise Objectives

Project Number: 689

Dear Mr. McDermott:

The Nuclear Energy Institute (NEI)¹ and an industry task force have developed and are seeking NRC review and endorsement of a standard set of recommended objectives and performance attributes for use in conducting a Hostile Action-Based (HAB) emergency response exercise. To facilitate your review, a copy of this material is attached. This version supersedes a draft previously provided for staff review dated April 2010 (ADAMS ML 101180293); we understand and agree that no further review work will be performed on this earlier submittal.

The attached revised document incorporates the staff's comments provided to NEI representatives during a public meeting on July 13, 2011.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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NEI and industry members request that the document review schedule developed by the staff target an endorsement date of no later than November 1, 2011.

Please contact me at (202) 739-8016; spg@nei.org if you require additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Perkins-Grew".

Susan Perkins-Grew

Attachment

c: Mr. Joseph D. Anderson, NSIR/DPR/DDEP/OR
Mr. Robert E. Kahler, NSIR/DPR/DDEP/IR
NRC Document Control Desk

HAB EXERCISE OBJECTIVES

To meet regulatory requirements and related guidance, a licensee must maintain a set of drill and exercise objectives which guides the periodic demonstration of response functions described in the site emergency plan. Since an exercise utilizing a Hostile Action-Based (HAB) scenario must be conducted during an exercise cycle, this set of objectives will need to be expanded to include a subset focused on demonstrating those functions uniquely performed in response to a hostile action. Appendix A, HAB Drill and Exercise Objectives, presents generic guidance that a licensee should use to develop a site-specific set of HAB drill and exercise objectives.

Each objective has an associated listing of Performance Attributes; these attributes define successful objective performance and should be used to develop the evaluation criteria for each objective. The development of objectives and evaluation criteria must be informed by site-specific emergency plan and implementing procedure requirements, and the content of existing drill and exercise objectives. A licensee is not expected to use the generic objectives verbatim; however, the function(s) described by each objective, and the associated performance attributes, must be addressed in the objectives and evaluation material used by the licensee to conduct an exercise.

As with any other emergency response exercise, each HAB exercise shall be critiqued to identify weaknesses and opportunities for improvement. Identified weaknesses shall be entered into the appropriate site corrective action process. Licensees should modify their critique processes as necessary to ensure a thorough review and evaluation of HAB-related exercise objectives.

Objectives for Offsite Response Organizations (OROs) are developed and evaluated in accordance with guidance provided by the Federal Emergency Management Agency (FEMA).

APPENDIX A - RECOMMENDED DRILL AND EXERCISE OBJECTIVES

Recommended Objective	Performance Attributes
1. Demonstrate the ability to implement the emergency plan during a hostile action-based event.	<p>Timely implementation of:</p> <ul style="list-style-type: none"> • emergency classification. • the formulation of Protective Action Recommendations (PARs). • Offsite Response Organization (ORO) notifications.
2. Demonstrate the ability to make initial notifications to law enforcement and other first-responder agencies during a hostile action-based event.	<p>Timely notifications are made to law enforcement, fire, medical and other first-responder agencies as specified by appropriate procedures. [Notification made to actual or simulated agency contact points.]</p>
3. Demonstrate the ability to communicate threat-related information to the NRC during a hostile action-based event.	<ul style="list-style-type: none"> • Perform accelerated notification to the NRC in accordance with appropriate procedures. [Notification made to actual or simulated NRC for a land or waterborne attack scenario.] • Perform airborne threat communications with the NRC in accordance with appropriate procedures. [Communications with actual or simulated NRC for airborne attack scenario.]
4. Demonstrate the ability of on-shift Operations and Security personnel to coordinate response actions among themselves, and with the Incident Commander and local law enforcement agency (LLEA) personnel.	<p>Discussion, decision-making and communication related to:</p> <ul style="list-style-type: none"> • threat type, location, progression and changes to protective strategies. • protective measure instructions to on-site personnel [communication may be simulated]. • entry, control, coordination and deployment of LLEA resources. • radios or other methods used to facilitate communications between licensee and law enforcement personnel.

Recommended Objective	Performance Attributes
	<ul style="list-style-type: none"> • understanding plant status and damage, personnel casualties and response priorities.
<p>5. Demonstrate the ability of on-shift Operations and Security personnel to coordinate with the Incident Commander for deployment of on-site and offsite first-responders in a post-attack environment.</p>	<p>Discussion, decision-making and communication related to:</p> <ul style="list-style-type: none"> • deployment of offsite first-responder personnel and vehicles to staging areas (e.g., fire trucks, ambulances, etc.). • radios or other methods used to facilitate communications between licensee and offsite first-responder personnel. • determination of on-site response locations and priorities. • rapid deployment of offsite first-responder personnel and vehicles to on-site response locations while maintaining control of site and Protected Area access. • implementation of initial accident mitigation actions prior to ERO mobilization, including movement of on-shift personnel to perform critical tasks.
<p>6. Demonstrate the ability to coordinate implementation of on-site radiation protection measures for offsite first-responders with the ICP.</p>	<p>Discuss, simulate and/or implement radiation protection measures for offsite first-responders reporting to the site, as appropriate to the scenario (e.g., dosimetry, KI, respiratory protection, etc.).</p>
<p>7. Demonstrate the ability of the Emergency Response Organization (ERO) to support operation of an Incident Command Post (ICP).</p>	<p>Discussion, decision-making and communication related to:</p> <ul style="list-style-type: none"> • support activation of an ICP. • accessibility by offsite responders. • dispatch of licensee personnel to the ICP to serve as liaisons to ERO facilities, and to advise on matters related to plant operations, radiation protection, and Security. • availability of site and plant layouts, and other aids that the ICP staff might

Recommended Objective	Performance Attributes
	<p>need to effectively coordinate law enforcement, fire and medical responses.</p> <ul style="list-style-type: none"> • coordination with field responders.
<p>8. Demonstrate the ability to coordinate mobilization of the Emergency Response Organization (ERO) with Security and the ICP.</p>	<p>Discussion, decision-making and communication related to:</p> <ul style="list-style-type: none"> • confirmation that the known threat has been neutralized to the extent necessary to allow ERO mobilization (land or waterborne attack). • selection of a method(s) to protect ERO members during movement and provide safe passage (e.g., use designated routes, armed escorts, vehicles, etc.). • mobilization instructions provided to responders (e.g., routes, escorts and exclusion areas; proceed directly to facilities; do not detour to inspect damage, etc.) . • allowing ERO members to exit the site and proceed to their assigned emergency response facilities (e.g., the EOF or JIC). • on-going protection of emergency response facilities and staff.
<p>9. Demonstrate the ability of the Emergency Response Organization (ERO) to coordinate in-plant and on-site response actions with Security and the Incident Command Post (ICP).</p>	<ul style="list-style-type: none"> • Effective interface between the ERO emergency director, Security supervision and the Incident Commander is maintained as conditions change. • Plant status is determined, and mitigative actions are planned and prioritized. • Alignment on priorities and assignment of resources. • Coordination and communications supporting timely movement of ERO personnel to perform on-site and in-plant response actions in a post-attack environment (e.g., dispatching an OSC

Recommended Objective	Performance Attributes
	<p>repair or survey team).</p> <ul style="list-style-type: none"> • ERO personnel adhere to movement and other restrictions imposed by Security and law enforcement decision-makers, (e.g., stay clear of perimeter zones, definition of free movement areas, special identification, two-person line-of-sight rule, use of escorts, etc.). • ERO Liaisons at the ICP are provided with information and updates in a timely manner. • As determined by law enforcement personnel, coordination and communication of actions to preserve a crime scene.
<p>10. Demonstrate the ability of the ERO to activate alternative facilities (if required by the scenario).</p>	<ul style="list-style-type: none"> • Determine if activation of alternative facilities is necessary based on the event conditions, and communicate this decision to ERO members. • Personnel at these locations are able to communicate with the Emergency Operations Facility, Control Room, and Security. • Personnel at these locations can make ORO notifications if required by emergency plan implementing procedures. • Personnel at these locations are able to perform engineering assessment activities, including damage control team planning and preparation.
<p>11. As appropriate to the scenario, coordinate deployment of fire and medical response resources between the ICP, on-site ERO facilities, and Security.</p>	<ul style="list-style-type: none"> • Decision-making and coordination support timely deployment of firefighting and medical responders to appropriate site and plant areas. [Consider limited deployment of actual resources to support this demonstration.]
<p>12. Demonstrate the ability to account for on-site personnel in a post-attack environment.</p>	<ul style="list-style-type: none"> • Discussion of strategies for conducting accountability of on-site personnel in a post-attack environment, including any

Recommended Objective	Performance Attributes
	<p>associated movement (e.g., assembly and release).</p> <ul style="list-style-type: none"> • Accountability within ERO facilities, including team deployments, is maintained consistent with Security and law enforcement requirements.
<p>13. Demonstrate the ability to perform an assessment of offsite radiological consequences as appropriate to the scenario events.</p>	<ul style="list-style-type: none"> • Perform offsite dose projections as appropriate to the scenario events. • Develop dose-based PARs as necessary. • Consider the impact of a release on the ICP and first-responder staging areas.
<p>14. Demonstrate the ability of the ERO to coordinate the development and release of public information in a post-attack environment.</p>	<ul style="list-style-type: none"> • Integrate public information officials from participating Federal, State and local law enforcement agencies, and first-responder agencies, into JIC operations. • Public information releases are vetted for sensitive and safeguards information prior to issuance.