

OBJECTIVE 32: UNANNOUNCED EXERCISE OR DRILL

OBJECTIVE

Demonstrate the capability to carry out emergency response functions in an unannounced exercise or drill.

INTENT

This objective is derived from NUREG-0654, as modified by FEMA Guidance Memorandum (GM) PR-1, which provides that OROs should demonstrate their emergency capabilities in an unannounced mode. (See evaluation criteria from Planning Standards E. and N.) The unannounced exercise or drill should take place during a specified seven-day period, made known to all exercise players. However, notification of the designated day within the seven-day period will be made only to those with a need to know (e.g., exercise controllers). This objective may be demonstrated in conjunction with Objective 33, Off-Hours Exercise or Drill, or the two objectives may be demonstrated separately.

The essential aspect of an unannounced exercise or drill is that participants responsible for the demonstration of exercise objectives do not know the exact time and date of the start of the exercise or drill. Exercise players are informed in advance of only the seven-day period when the exercise or drill will be conducted.

This objective may be met through either an unannounced exercise or an unannounced drill. When this objective is demonstrated during a biennial exercise, demonstration should include emergency response functions such as: activation of emergency operations center(s) (EOC), mobilization of staff to report to the EOC, establishment of communication linkages, and completion of telephone call-downs. Because commercial nuclear power plant emergencies may take place at any time, response organizations should have the capability to respond on short notice. This objective tests such capabilities for emergency personnel at EOCs, staging areas, and field locations, and should be demonstrated concurrently with Objective 1, Mobilization of Emergency Personnel.

When demonstrated during an unannounced drill, OROs should demonstrate the capability to mobilize at least one key staff member to the EOC. The key staff member(s) should contact additional staff by telephone, pager, or other means described in the plan. The key staff member(s) should inquire as to availability of staff to report to their assigned duty stations and estimated times of arrival (ETA). The key staff member(s) should also establish communication links with other EOCs.

Demonstration of this objective may be satisfied by the effective response and documentation of designated key Radiological Emergency Preparedness (REP) staff to an

actual emergency during the six-year period.

Exemptions to this demonstration may be requested through the FEMA Regional Office. Credit will be given for this objective when the following provisions are met by State and local governments response to an **actual** emergency.

1. The emergency required a prompt and timely response and mobilization of key State and local government staff and providers responsible for REP emergency functions.
2. Key REP staff who would report to an EOC, in accordance with the plans, actually reported to an EOC.
3. The EOC(s) of the responding jurisdiction(s) was activated.
4. The emergency resulted in the establishment of communication links among responding organizations.
5. In order for FEMA Regional/Headquarters to consider approving credit, documentation must be provided on the level of response and involvement of key REP staff to the emergency. This includes:
 - o type of emergency
 - o time of response
 - o time State and local REP staff arrived at EOC
 - o list of involved personnel and organizations
 - o communications log showing the establishment of communication links with other organizations
 - o involved jurisdictions
 - o emergency decisions made and implemented
 - o resources used

When credit is granted to one or more organizations within the plume emergency planning zone (EPZ) and not to all organizations, those organizations not receiving credit should satisfy the off-hours and unannounced provisions in an exercise drill.

DEMONSTRATION CRITERIA:

NUREG

CRITERION

N.1.b. 1. OROs conduct an unannounced exercise or drill.

Explanation

Responsible OROs should demonstrate the capability to conduct an unannounced exercise

or drill within a seven-day window. The seven-day window will be known to all exercise players. The exact date will be revealed only to those personnel with a need to know (e.g., exercise controllers).

Extent of Play

When this activity is demonstrated in connection with an exercise, all mobilization activities should be completed as in an actual emergency. When this objective is demonstrated in a drill, the scope of the demonstration should include normal personnel alert and notification procedures.

NUREG

CRITERION

**E.1.,2.
N.1.b.**

2. OROs use effective procedures to alert, notify, and mobilize key emergency personnel in accordance with declaration of emergency classification levels. In the case of an unannounced drill, at least one key staff member is mobilized to the emergency operations center.

Explanation

Responsible OROs should demonstrate the capability to receive notification of an emergency situation from the licensee and contact and alert emergency personnel, including volunteers. Communication systems could include commercial telephone, automatic dialing system, and pagers. OROs should be capable of demonstrating the sequence of alerting emergency staff upon notification of a specified emergency classification level (ECL) (e.g., Site Area Emergency). Moreover, OROs should demonstrate the capability to locate and use up-to-date rosters of predesignated emergency staff. These rosters should be available for all shifts. For an unannounced drill, OROs should demonstrate the capability to mobilize one key staff member to the EOC. The staff member(s) is responsible for conducting a call-down of EOC personnel in order to establish their availability and ETAs.

Extent of Play

All activities associated with this objective should be demonstrated through the use of equipment and procedures that would be used in an actual emergency. Proper demonstration of this criterion entails alerting personnel who are at non-emergency duty stations or at off-duty locations prior to the start of the exercise or drill. Demonstration of this objective should begin with receipt of a message containing the declaration of ECL, which begins the alerting sequence.

NUREG

CRITERION

**E.1.,2.
N.1.b.**

3. Communication links with other emergency operations centers are established in a timely manner.

Explanation

Responsible OROs should demonstrate the capability to establish timely communication links between the EOC and the EOCs of other participating OROs. The appropriate key staff member(s) mobilized to each EOC should demonstrate establishment of communication linkages and document the EOC's call-down.

Extent of Play

Under this criterion, the appropriate key staff member(s) mobilized to the EOC should demonstrate the capability to contact other EOCs using the equipment and procedures that would be used in an actual emergency.

NUREG

CRITERION

N.1.a.

4. All activities described in the demonstration criteria for this objective are carried out in accordance with the plan, unless deviations are provided for in the extent-of-play agreement.

Explanation

Responsible OROs should demonstrate the capability to follow policies, implement procedures, and utilize equipment and facilities specified in the plans. OROs should demonstrate that they can follow sequences outlined in the various procedures and perform specified activities, as necessary.

Extent of Play

Under this criterion, all activities should be carried out as specified in the plan, unless deviation from the plan is provided for in the extent-of-play agreement.

CLARIFICATION OF TERMS

Activation refers to a process by which a facility is brought up to emergency mode from a normal mode of operation. Activation is completed when the facility is ready to carry out full emergency operations.

Alerting of personnel refers to transmission of a signal or message that places personnel on notice that a situation has developed which may require them to report for emergency duty.

Drill refers to an event involving organizational responses to a simulated accident to develop, test, and monitor specialized emergency skills that constitute one or more component of an emergency plan and procedure.

Emergency classification level(s) (ECL):

- (1) **Notification of Unusual Event** indicates that unusual events are in process or have occurred that indicate a potential degradation in the level of plant safety. No releases of radioactive material requiring offsite response or monitoring are expected, unless further degradation of safety systems occurs.
- (2) **Alert** indicates that events are in process or have occurred that involve an actual or potential substantial degradation in the level of plant safety. Releases are expected to be limited to small fractions of the Environmental Protection Agency (EPA) protective action guides (PAG) exposure levels.
- (3) **Site Area Emergency** indicates that events are in process or have occurred that involve actual or likely major failures in the plant functions needed for protecting the public. Releases are not expected to exceed EPA PAG exposure levels, except near the site boundary.
- (4) **General Emergency** indicates that events are in process or have occurred that involve actual or imminent substantial core degradation or melting, with potential for loss of containment integrity. Releases can reasonably be expected to exceed EPA PAG exposure levels offsite, beyond the immediate site area.

Emergency operations center refers to a facility that is the primary base of emergency operations for an ORO in a radiological emergency.

Key staff refers to those emergency personnel, sufficient in numbers and functions, necessary to carry out emergency operations as required by scenario events and as set forth in the emergency plans.

Notification and mobilization of personnel refers to transmission of messages to emergency personnel to inform them of an emergency situation and to directing them to report to emergency duty at their assigned duty stations.

Off-hours refers to the hours between 6:00 p.m. and 4:00 a.m. or any weekend hours.

Timely, in this objective, refers to emergency personnel being in place at emergency operations centers, ready to assume emergency response duties as driven by the scenario events and emergency classification levels, in accordance with ORO plans. It is recognized that emergency personnel may not be able to be at their assigned duty stations prior to the need to initiate protective actions for fast-breaking emergencies. In the case of a drill executed under the interim option, only one designated key individual is required to be mobilize to the emergency operations center.

Unannounced exercise (or drill) refers to an exercise (or drill) for which knowledge of the exact date and time is restricted to those individuals with a need to know.