



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

November 3, 2022

Jay Barnes
Emergency Preparedness Manager
Susquehanna Steam Electric Station
Susquehanna Nuclear, LLC
769 Salem Blvd.
Berwick, PA 18603-0467

**SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – FEDERAL
EMERGENCY MANAGEMENT AGENCY LEVEL 1 FINDING FROM 2022
EVALUATED EMERGENCY PREPAREDNESS EXERCISE**

Dear Jay Barnes:

On October 18, 2022, the U.S. Nuclear Regulatory Commission (NRC) and Federal Emergency Management Agency (FEMA) completed an evaluation of an emergency preparedness exercise at the Susquehanna Steam Electric Station. During this exercise, FEMA identified a Level 1 Finding related to the performance of activities performed by the Columbia County Emergency Operations Center.

Enclosed is correspondence from FEMA Region III to Pennsylvania Emergency Management Agency, dated October 25, 2022, which provides detailed information about the issue involved in the Level 1 Finding (ADAMS Accession No. ML22299A174). As discussed in our October 28, 2022, telephone call, the NRC is performing our responsibilities described in the Memorandum of Understanding (MOU) between FEMA and NRC (Appendix A to 44 CFR 353). This MOU is also available in ADAMS (ML15344A371). Specifically, this letter and its enclosure serve as formal notification of the Level 1 Finding and our responsibility to monitor Susquehanna's efforts to work with State and local authorities to correct the identified inadequacy. Approximately 60 days after official notification of the Level 1 Finding, the NRC, in consultation with FEMA, will

assess the progress being made towards resolution. This is to ensure that reasonable assurance remains, and the offsite organizations retain their ability to take appropriate protective measures to ensure the health and safety of the public.

If you have any questions, please do not hesitate to contact me at (610) 337-5337.

Sincerely,

Jonathan E. Greives, Chief
Projects Branch 4
Division of Operating Reactor Safety

Docket Nos. 05000387 and 05000388
License Nos. NPF-14 and NPF-22

Enclosure:
FEMA Level 1 Finding Letter
(ADAMS Accession No. ML22299A174)

cc w/ encl: Distribution via ListServ

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – FEDERAL EMERGENCY MANAGEMENT AGENCY LEVEL 1 FINDING FROM 2022 EVALUATED EMERGENCY PREPAREDNESS EXERCISE DATED NOVEMBER 3, 2022

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ADAMS ACCESSION NUMBER: ML22307A178

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FEMA

October 25, 2022

Mr. David R. Padfield
Director
Pennsylvania Emergency Management Agency
1310 Elmerton Avenue
Harrisburg, PA 17110

Dear Mr. Padfield:

The purpose of this letter is to notify you of the Federal Emergency Management Agency's (FEMA) identification of a Level 1 Finding that occurred during the Susquehanna Steam Electric Station (SSES) Radiological Emergency Preparedness (REP) Exercise conducted on October 18, 2022. A Level 1 Finding is being assessed against the Columbia County Emergency Operations Center under Capability Target 1.2 (Direction and Control) and Capability Target 3.3 (Emergency Information and Instructions to the Public and News Media) as described below:

Capability Target 1.2:

In accordance with the Columbia County Radiological Emergency Response Plan, the County Commissioners have the authority and responsibility for protective actions in the County and to approve press releases prior to distributing same to the media. During the exercise one of the County Commissioners created a disruptive environment by focusing on termination of the exercise. The Commissioner present at the Columbia County Emergency Operations Center (EOC) pressured the Emergency Management Coordinator, the exercise evaluation team, and the exercise controller to hasten exercise play and threatened to terminate the exercise and release staff from the EOC prior to the completion of all required demonstrations/evaluations. The Commissioner's action led to some staff departing prior to the County meeting exercise objectives. This action may have also contributed to a lack of a media briefing being conducted.

Further, the Columbia County Commissioner(s) are responsible for the release of prepared instructions for the public at the time of an emergency associated with the Susquehanna Steam Electric Station. The Commissioner present at the EOC did not conduct a thorough review of press releases, specifically Press Releases #10 and #11, which contained inaccurate protective actions for the public, and approved the release of these inaccurate messages. Without adequate review and approval of press releases, the public would have received conflicting information from



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different sources for evacuation and KI information. This could have led to some members of the public not following the correct protective action issued by the Governor of Pennsylvania.

Capability Target 3.3:

The Governor of the Commonwealth of Pennsylvania made a protective action decision (PAD) at 2034 that recommended all persons in the 10-mile emergency planning zone to evacuate and ingest KI. Prior to that, a protective action recommendation (PAR) was provided by the licensee, Talen Energy, to the Commonwealth which recommended persons to evacuate 0-2 miles 360 degrees around the plant, and 2-5 miles in the downwind sectors (A, B, C, D, E, Q and R). The Columbia County EOC incorrectly acted on the PAR issued by Talen Energy and issued Press Release #10 at 2029 that instructed persons in a 360-degree radius, 0-5 miles from the plant to evacuate and ingest KI. Then, to correct Press Release #10, issued Press Release #11. Press Release #11 was also incorrect and stated that persons in a 360-degree radius from the plant 2-5 miles, in sectors A, B, C, D, E, Q and R to evacuate. Sectors A, B, C, D, E, Q and R are wind sectors, and these are not contained in the emergency information brochure provided to residents living in the emergency planning zone, and were not explained in a special news bulletin, media briefing, or press release.

Additionally, the Columbia County EOC failed to conduct a media briefing, which is required in the Columbia County Radiological Emergency Response Plan and required under the negotiated Extent-of-Play Agreement for the exercise. There were no clarifying statements or media briefings conducted that could have clarified the error. This conflicting information provided by Columbia County could have led some members of the public to not follow the correct protective action issued by the Governor.

In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with the pertinent organizations participating in the offsite exercise evaluation. The FEMA REP Program Manual, defines a Level 1 Finding as "... an observed or identified inadequacy of organizational performance in an assessment activity that could cause a determination that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant."



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Recommended courses of action to correct the Level 1 Finding prior to the required remedial exercise include:

1. Conduct refresher training to County Commissioners on their role in the Columbia County Radiological Emergency Response Plan.
2. Conduct training on the PAR/PAD process and the importance of not acting on the licensee PAR.
3. Ensure processes are in place to thoroughly review and approve press releases prior to dissemination.
4. Ensure that there is an understanding of the FEMA Radiological Emergency Preparedness Program exercise requirements, exercise extent-of-play agreement, and full-participation in the exercise.

Any procedural changes will require review from the Region 3 REP staff prior to the required remedial exercise.

Because of the potential impact of a Level 1 Finding on the protection of the public health and safety, these items must be corrected and redemonstrated via a remedial exercise within 120 days from the date of the October 18, 2022 biennial exercise. In accordance with the FEMA REP Program Manual, if the remedial exercise can be successfully completed within 75 days of the biennial exercise, FEMA includes the results and findings of the remedial exercise in the final After Action Report (AAR) for the biennial exercise.

FEMA Region 3 is committed to supporting the completion of an exercise as soon as practicable, preferably within 75 days. Please coordinate with members of the FEMA Region 3 REP staff to determine the date and time of the remedial exercise within 10 days from receipt of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Thomas Scardino at (202) 374-2449.

Sincerely,

MaryAnn Tierney
Regional Administrator