

**NATIONAL EMERGENCY MANGAEMENT ASSOCIATION  
PREPAREDNESS COMMITTEE  
POSITION PAPER**

Date: October 1, 2017

Subject: Position Paper on Southern Exposure 2015 Findings and Recommendations

Discussion: Southern Exposure 2015 (SE15) was a Full Scale Exercise for the integration of organizations at all levels of government and the private sector to demonstrate the ability to coordinate and conduct response and recovery activities during an incident at the H. B. Robinson Nuclear Generating Plant in Hartsville, South Carolina. The exercise was conducted over a five-day period (21-23 July 2015 followed by a 9-10 September 2015 recovery TTX). The first two days of the exercise (21-22 July 15) were response oriented followed by a TTX that moved forward to Day 14 of the scenario. The TTX included breakout groups that focused on issues related to the economy, infrastructure, agricultural contamination, re-entry, return, and relocation. A recovery-focused TTX was conducted 9-10 Sep 15 and explored housing, agriculture, and economic recovery at 6 and 18 months post-event. Findings and recommendations are:

1. Finding: Unified Coordination Group (UCG) membership and composition for a nuclear plant incident is not clearly defined.
  - a. Analysis: SE15 provided State and interagency representatives the first opportunity to assess the structure and operation of a UCG during a nuclear power plant incident. As part of the planning process, the Exercise Support Working Group (ESWG) identified federal departments and agencies that should be represented on the SE15 UCG, the body responsible for managing federal, State, and local coordination of field operations in support of the State during the exercise. The guiding concept for recommended federal membership on the UCG was the inclusion of agencies and their components that have statutory authority or possess key operational capabilities that could inform or enhance the State's response. This concept was in accordance with guidance in the National Response Framework (NRF) on how the federal government can best support the State in achieving its established objectives and priorities. For this exercise, the UCG consisted of the federal Coordinating Officer, State Coordinating Officer, Defense Coordinating Officer, Duke Energy (utility), Nuclear Regulatory Commission, Department of Energy, and the Environmental Protection Agency. The size of the group was somewhat unwieldy and also was very federally-centric with only one state member and no local representation.
  - b. Recommendation: UCG membership and rationale for its composition and size during a nuclear power plant event should be clearly articulated in future updates to the Nuclear/Radiological Incident Annex to the Response and Recovery Federal Interagency Operational Plans.
2. Finding: Policies regarding Low Level Radioactive Waste (LLRW) remediation are not well defined.

- a. Analysis: There is not a policy regarding low level nuclear waste storage or disposal in the aftermath of a nuclear power plant incident. One federal agency with overarching responsibility to address the complicated nature of decontamination, waste storage and remediation has not been identified. In addition, some states lack federal facilities willing to accept low level waste or used fuel rods from reactors. As an example, Savannah River Site (SRS) commented that they would not accept radioactive waste for storage in the aftermath of Southern Exposure. Shipping low level waste to other states is logistically difficult as a result of permitting and transportation issues. Further, remediation responsibilities and authorities are not clear.
  - b. Recommendation: The nuclear industry or federal agencies (NRC, DOE, and FEMA) develop a plan or guidance for states to handle significant quantities of radiological waste after a radiological event, including responsibilities and how to pay for remediation.
3. Finding: There are funding gaps related to reimbursement to individuals and government agencies during a nuclear power plant incident.
  - a. Analysis: The Price - Anderson Act is the vehicle that outlines the fiduciary responsibilities between the private and public sector. The American Nuclear Insurers (ANI) execute the delivery of emergency financial assistance to the evacuated population, but there are limitations in funding and extended reimbursement timelines to the public sector. Initial ANI funding for individual reimbursements will not be available until 3-5 days after the event. ANI parameters of assistance have gaps and will not probably fund certain items to include case management costs, emergency protective measures, overall management costs, and reimbursements to individuals in the ingestion pathway zone. There is currently no guidance outlining potential use of the Stafford Act to close the gap between emergency financial assistance provided by ANI funding and actual costs to the public sector.
  - b. Recommendation: FEMA should develop guidance for the use of the Stafford Act as a limited bridging strategy during a nuclear power plant incident to cover funding gaps created by Price-Anderson.
4. Finding: State and local governments must be involved in the development of the Plan of Distribution developed at the local level to account for the needs of the population and communities and a comprehensive Recovery Support Strategy for a nuclear power plant incident has not been developed.
  - a. Analysis: A key task during recovery is the development and implementation of the Plan of Distribution and the Recovery Support Strategy. The Plan of Distribution developed in conjunction with the Nuclear Regulatory Commission identifies the priorities of the available funds beyond emergency financial assistance to support the reimbursement of losses and expenditures by the public in both response and recovery. This plan must be developed based on the assessment of the local community and reflect the priorities of the population to mitigate the long term impacts of the event. The development of the recovery support strategy should be shaped by assessments, public opinion and shared understanding of the science that will support decisions to return in order to restore the lives of both the evacuated and impacted population.
  - b. Recommendation: Develop a national level recovery remediation framework for implementation at the State and local level that would include State and local involvement in

the development of the Plan of Distribution. The Recovery Support Strategy should address time and impacted areas with recurring reassessments to ensure changes in the operational environment are captured and utilized in funding prioritization.

5. Finding: There is no central repository of federal agency guidelines, plans, or capabilities.
  - a. Analysis: Without a clearinghouse of federal agency guidelines, plans, and capabilities it is difficult for State and local authorities to efficiently integrate federal organizations into local response and recovery operations.
  - b. Recommendation: FEMA establish a central repository for federal agency guidelines, plans, and capabilities for a nuclear power plant incident.

Moved:

Disposition:

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Authenticated: \_\_\_\_\_

Secretary

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