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AK RIDGE NATIONAL LABORATORY

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POST OFFICE BOX X
OAK RIDGE, TENNESSEE 37831

December 17, 1986

Dr. William Chambers
MS K497
Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Dear Bill:

I am enclosing my comments on Mighty Derringer, as promised. As you can see they deal primarily with the application of the Federal Radiological Emergency Response Plan to that situation and the DOE role under the Federal Radiological Monitoring and Assessment Plan portion of that plan. The comments reflect my observations, as well as my discussions with some of the players.

Overall, I think this was a useful exercise. While it would have been nice to have a higher level of consequence play, the state and local participants got a chance to deal with some of their federal counterparts, see what kind of assistance might be available, and work with each other outside of the usual office environment on the exercise problems. Almost everyone learned something from the experience. My comments need to be kept in this perspective.

Please call me next month (FTS 624-5816) if you have any questions or want to discuss this material.

I enjoyed meeting and working with you.

Have a nice holiday.

Sincerely,

Kathy

Kathy S. Gant
Emergency Technology Program

Enclosure: Exercise comments

cc: M. V. Adler
C. V. Chester
E. J. Jascewsky, DOE-CH
W. F. Wolff, DOE-HQ

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84

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NAO-87-3

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COMMENTS ON EXERCISE MIGHTY DERRINGER

December 18, 1986

A. General Comments

1. The consequence portion of the exercise and the state and local play were not integrated well into the rest of the exercise. More state and local input to the planning would have been useful.
2. The control team for the exercise was understaffed and not well coordinated. There were not enough monitors to keep track of play at different locations. No system was established for collecting exercise documents, status reports, etc., for later review and documentation. All controllers were not kept informed of events at other places so they could adjust their injects.
3. The different levels of participation allowed some groups to overwhelm others when they had to work together and led to differing degrees of play and demands for data. The state and local players did not have much of their technical support available.
4. It is important in an exercise like this to have the local or state executive play or designate one of his staff to play. There must be a strong person in that role; having a law enforcement officer simulate that role is not adequate. The executive must be strong enough to challenge the FBI or DOE when he or she thinks the interests of his or her jurisdiction are not being respected. This interference may make the play more difficult, but it is much closer to real life and could serve a useful training function.
5. The timeline for the exercise was not internally consistent. Many of the problems considered by the state and local players would not have been considered in real life until more than two days after the event. A planned time-jump with new data already prepared could have helped on this problem.
6. The card system for logging events and comments has potential. It would be interesting to see how it would have functioned if the computer database could have been used.

B. Comments on the Application of Federal Radiological Emergency Response Plan (FRERP)

1. The players had varying degrees of knowledge of the FRERP. Everyone was not playing by the same rules at times.
2. The designation of FEMA as the cognizant federal agency (CFA), along with the designation of DOE to coordinate public information, was somewhat

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NAD-87-3



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Inconsistent with the plan. The cognizant federal agency and FEMA are supposedly responsible for coordinating public information. These designations may have caused no problem, or the press play may have been too limited for problems to appear.

3. The FRERP specifies the cognizant federal agency for the most commonly-thought of accidents, with only loose guidance being given for selecting a CFA (or deciding that it is not appropriate to have a CFA) in other situations. Perhaps some of the other situations should be defined or classified and agreement obtained in advance on the lead agency.
4. In postexercise comments, many participants stressed the need to organize by functional groups, regardless of whether local, state, or federal organizations were represented. In a real situation, the participants might be spread among different operations centers. Getting functional groups together could be more difficult. The Federal Radiological Monitoring and Assessment Center (FRMAC) was planned as a functional center. Methods of working closely with state and local counterparts should be an important consideration of the Federal Response Center.

C. Comments on the Operation of the Federal Radiological Monitoring and Assessment Center (FRMAC)

1. The NEST Onscene Commander's decision to assume the role of Offsite Technical Director (OSTD), the coordinator of the federal radiological support to the state, made it more difficult for the Federal Radiological Monitoring and Assessment Plan (FRMAP) portion of the FRERP to be tested. The FRERP was written with the assumption that the Onscene Commander and the OSTD would be different people with different responsibilities, with the Onscene Commander being the senior DOE official during the time that DOE had both onsite and offsite roles. The Onscene Commander delegated much of the work of the FRMAC to his Director of Hazards and Assessment.
2. Although well-qualified technically, the management of the FRMAC had little knowledge of the FRERP or its approach to radiological assistance. Each DOE region for radiological assistance has developed a regional plan for implementing the FRMAP; these plans usually discuss the organization and operation of a FRMAC. The FRMAC management had players developing operational plans and procedures when plans already existed.
3. Many operational problems in the FRMAC were recognized by players as the play progressed, i.e., data and information flow, quality control, assessments vs. recommendations, access by press, need for liaisons, availability of maps, etc. Many of these problems have already been identified during the FRERP planning and in previous exercises and are addressed in the existing regional FRMAP implementation plans; however, the problems reappeared because the FRMAC management was not familiar with that experience.

~~EXERCISE SENSITIVE~~

86

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NAO-84-3

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EXERCISE SENSITIVE

4. The capabilities of the regional DOE office and other federal agencies were not fully used. The EPA representative was rarely involved in the assessment or in management decisions. The assessment group did not take advantage of the close working relationship between the regional DOE Radiological Assistance Program coordinator and the state. These regional DOE people were the only ones the state knew. The state was comfortable asking them for help. This relationship should be incorporated into the FRMAC operation, regardless of which organization provides the OSTD.
5. The NEST search teams may provide the first available federal personnel for radiological monitoring. DOE should reexamine the radiological qualifications of the searchers to see if some additional training could enable the search teams onsite to be reconstituted as field monitoring teams, in the event of a consequence.
6. The FRMAC did not always meet its objective of providing timely, controlled data to the state. Data flow improved as the exercise went on as problems were recognized and corrected. DOE decided on its own in the FRMAC what consequence projections to give the state. The state realized (and was extremely impressed by) the quality of the federal radiological personnel. The state needed, however, to be able to work closely with the federal people. If the state radiological people had been more involved in the assessment activities, the information produced might have better met their needs.

D. Summary Comment

Under the FRERP, DOE may have onsite responsibilities as CFA or in support of the lead agency (such as NEST assistance to the FBI), as well as coordinating the federal offsite radiological support for the CFA and the state. Although the DOE roles may vary somewhat with each radiological incident, any federal radiological assistance to state and local authorities should be provided in as consistent a manner as possible. States are now generally using the FRERP as the basis for federal/state interaction. Other federal agencies involved in radiological assistance also act within the framework of the FRERP. Wide variances in the way federal radiological assistance is coordinated, the lack of involvement of the regional radiological assistance staff, and the disregard of existing regional plans will decrease DOE's credibility with the states and cause confusion and frustration among other federal agencies.

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