

Hostile Actions Based (HAB) Planning and Response Guidance for an Incident at a Nuclear Generating Plant in Minnesota

Planning Considerations

Planning needs to accommodate three major events happening simultaneously:

- Hostile action-based (HAB) event (an act toward a nuclear power plant or its personnel that includes the use of violent force – guns, explosives, projectiles, vehicles, or other destructive devices – to destroy equipment, take hostages and/or intimidate the licensee to achieve an end).
- 2. Radiological emergency situation at the nuclear generating plant.
- 3. Increased state and national threat level and the precautionary measures that will need to be implemented at other locations.

Planning needs to address various types of hostile actions occurring at a nuclear generating plant including:

- Land-based
- Water-based
- Aircraft-based
- o Insider-based
- Combination of insider attack and external attack

A HAB incident will rapidly escalate through the emergency classification levels (ECLs), and by the time the initial notification is made, the site may be at a General Emergency.

The initial notification may be from the 911 call from plant security requesting assistance with the official notification and emergency classification level being determined later.

A command post at or near the site will need to be established and added into plans and procedures. The command post will have primary responsibility for coordinating the onsite (inside or near the fence) response to the hostile action.

The state and county emergency operations centers (EOCs) will maintain primary responsibility for coordination of the off-site (outside the fence) response to the radiological emergency portion of the incident.

The responsibility of protective action decision (PAD) making, for the public, will remain with the state EOC.

Emergency worker radiological exposure control coordination and emergency worker turn-back limit decisions and procedures will remain at 1 rem in the state plan and procedures.

Considerations for responders going to the site:

- Pre-issue Thermoluminescent dosimeters (TLDs) and potassium iodine (KI) to all designated on-site responders, or
- Pull responders back at a General Emergency, issue dosimeters, TLDs, KI and do just-in-time training if needed, or
- Quick authorization to exceed dose limits for critical lifesaving or law enforcement actions.

Emergency worker decontamination procedures will remain the same and will use the existing sites designated in the Minnesota Emergency Operation Plan (MEOP).

Media Briefings

Initial media information and briefings will be coordinated and conducted by the joint



information center (JIC) from the SEOC for all events simultaneously.

- Initial media advisories and news releases will be done by the JIC in the SEOC Media Briefing Room.
- A media briefing location near the nuclear power plant will be established once the event is stabilized and the decision is coordinated with the SEOC, JIC, county EOC and incident command post.
- The JIC will establish a process to coordinate with FBI and law enforcement on timely sharing and release of information while understanding the need to withhold sensitive information to protect the integrity of the criminal investigation and evidence collection.

Protective Actions

Radiological emergency protective actions will be implemented in accordance with the approved plans and procedures with the following modifications:

- Traffic and access control points for the 2mile area around the plant may be established at a Site Area Emergency ECL to restrict traffic near the plant site and establish an outer perimeter.
- The preferred initial PAD for the 2-mile area at a General Emergency ECL will be to shelter in place. The 5-mile down-wind PAD will be to shelter or evacuate based on plant conditions in accordance with existing plans and procedures.
- Precautionary messages will be issued to the public in the 2-mile area asking residents to stay indoors and off roadways.
- Local resources will need to be available to support the on-site response and will not be able to do off-site activities simultaneously.

Communication

Agencies will need to staff all on-site HAB and off-site REP functions simultaneously.

- Baseline plans may need to be updated with responsibilities transferred to other agencies based on the on-site HAB response functions of the various agencies.
- Communication with the command post will need to be established.
- Communication will need to be established to manage threat information coming from the utility as well as how the state or local jurisdictions will notify the utility of a threat.
- All existing notification systems and communication protocols will remain the same.
- All existing REP protocols and procedures, unless modified, will remain in place and be used during a HAB incident.
- A plan will need to be established for heightened security if a different plant is attacked. If a plant is attacked in the U.S., all plants will be placed in a heightened security environment and local and state governments will be asked to provide heightened security as well.
- Plans need to reflect how the Minnesota Fusion Center at the Bureau of Criminal Apprehension (BCA) will be integrated into the information flow at the state and county level.

Coordination Considerations

Current radiological emergency response plans do not incorporate the implementation of an on-site or near-site command post, because there is no on-site response required in traditional REP response plans.

For a HAB incident, an on-site response element is required and a command post must be established to coordinate and manage the activities at or near the plant.



Command Post

A command post must be established near the site to coordinate the on-site response. The command post should be established in a safe area from both a tactical and downwind perspective.

- Local responders have the responsibility for locating and establishing the command post.
- Pre-determined locations for the command post should be developed.
- The possibility of a second attack on responding personnel should be considered when determining the command post location.
- Local responders are responsible for notifying the appropriate agencies where the command post is located.
- Pre-determine what agencies will be represented at the command post.
- Establish a tactical staging area.

Unified Command

Unified command will be implemented with city, county, state, federal and utility representation at the command post.

- The command post staff will focus on the coordination of the response to the hostile action at the site.
- Coordination and cooperation between the SEOC and county EOCs will be critical in ensuring seamless operations.
- Plans must define who has overall coordination authority at the command post.
- Primary and backup communication will be established between the command post and county and state EOCs.
- Plans and procedures must identify primary and backup communications methods.

- Radio communications between the on-site security and off-site responders must be established at the command post.
- A state homeland security liaison will be dispatched to the command post. When the state liaisons arrive, which will not be immediate, they will report to the command post to assist the local authorities and coordinate on-site state assistance.
- FBI should deploy to the command post.
- NRC should deploy to the command post
- Other federal agencies will be deploying to the site as needed.
- Determine what other federal agencies will be responding directly to the site and the EOCs.
- A utility security and radiological protection liaison will deploy to the command post. Each liaison must be an individual with detailed working knowledge of the facility, plant layout, security procedures, equipment, detailed blueprints and floorplans of the facility, ability to communicate with the security force and the ability to commit resources.
- The command post must be able to conduct an analysis of intelligence and information obtained at the site and communicate that information off-site to the appropriate agencies.

Public Information Officer

A state PIO, if required, will be deployed to the command post, but media briefings will be from the JIC. The initial media briefing will be conducted at the media briefing room in St. Paul.

- The command post PIO will be a liaison between the command post, the state joint information center and the state incident manager.
- The command post PIO will work with the incident commander to ensure the



- appropriate information about the response to the incident is communicated.
- After the incident is stabilized, and if there
 has not been a release of radioactive
 material, a near-site media briefing area
 may be established as coordinated with the
 incident commander, PIO and the EOCs.

Command Post

The command post will coordinate response activities at or near the site (inside or near the fence).

- Establish a 360-degree inner perimeter based on incident conditions (note that the outer perimeter will be the 2-mile sub area and implemented by the EOCs at an SAE).
- Control and manage water-based access onto the site.
- Control and manage land-based access into the site.
- Establish and maintain communications with county and state EOCs.
- Establish and maintain communications with utility security staff on site.
- Coordinate and communicate with the state field teams for sampling inside the 2-mile area when it is safe to do so.

Staging Area

Establish a staging area that is a safe distance from the site from both a tactical and downwind exposure perspective.

- Communicate staging area information to the county EOCs.
- Pre-identify primary and secondary staging areas.

County EOC Responsibilities

Support the command post requests for on-site activities.

 County EOC will determine where the sheriff (top county law enforcement official)

- will be located (either at the command post or at the county EOC).
- Implement off-site protective actions as determined by the SEOC in accordance with the REP plan.
- At the SAE, establish outer perimeter by implementing the 2-mile area traffic access control point staffing.
- At the declaration of a general emergency (GE), people in the 2-mile area will shelterin-place and people in the 5 miles downwind area will evacuate, as directed by the SEOC.
- Coordinate with the command post to determine when it is safe to evacuate the 2mile area and notify the SEOC when evacuations can be implemented.
- Coordinate with command post to pull back emergency workers and issue dosimetry, KI and TLDs and conduct responders briefings at a General Emergency if there is a release of radioactive material.
- Establish family assistance centers to track and reunite family members during longterm incidents.

State EOC Responsibilities

- Support command post requests for on-site response activities through the county EOC.
- Coordinate state agency response activity requests.
- Coordinate federal agency response assistance.
- Implement off-site protective actions as determined by the governor's authorized representative (GAR) in accordance with state statutes and the Minnesota Emergency Operations Plan (MEOP).
- Implement enhanced security protocols for the non-affected nuclear power plant and other critical infrastructure in the state.



- Implement situational notifications to other critical infrastructure sites.
- Integrate information between the BCA's Minnesota Fusion Center and the SEOC.
- Establish the JIC to provide and coordinate all media requests and release of information to the public.
- At SAE, coordinate the implementation of the 2-mile area traffic and access control points.
- Coordinate media information advising people in the 2-mile area to stay indoors and keep the roadways open for emergency vehicle response.
- Coordinate with the state field teams to monitor for radiation early in the event outside of the 2-mile area to assure the public of no release.
- At the declaration of a GE, shelter the 2mile area and evacuate five-miles downwind.
 - Coordinate with command post, through the county EOC, to determine when it is safe to evacuate the 2-mile area.
- Request a federal emergency declaration.
- If control of the site is lost and a radioactive material release occurs, pull resources back to a safe area (outside the affected subareas) and request direct federal assistance for resources to take back control of the plant.
- Coordinate the federal radiological support resources.
- Request key federal agency representation in the SEOC from:
 - o FBI liaison
 - o FBI PIO
 - o DHS liaison
 - o DHS PIO
 - o FEMA liaison
 - NRC liaison

Senior federal law enforcement agency

Nuclear Generating Plant HAB Coordinated Response Actions Based on ECL

HAB Alert ECL Actions

- Local agencies respond to the scene and engage in the situation.
- Establish a unified command post.
- Local and state EOCs fully activated.
- Governor issues an emergency executive order activating the SEOC and National Guard and establishes the GAR.
- A JIC is established by the state and initial media releases are distributed.
- JIC media briefings are conducted by the SEOC.
- [Media advisory is released notifying residents within 2 miles of the plant to stay indoors and off roadways.]
- The command post will establish the inner perimeter.
- SEOC coordinates requests for National Guard, State Patrol tactical team, state bomb squads, state hazardous materials teams, etc.
- Incident-related calls are transferred from the State Duty Officer to the SEOC upon activation.

HAB Site Area Emergency ECL Actions

Ensure that all activities are implemented for HAB alert ECL.

- Governor issues an emergency executive order declaring a state of emergency.
- Media advisory issued by the JIC requesting residents within 2 miles of the plant to stay indoors and off roads.
- Implement the 2-mile area traffic and access control points and restrict access into the area.



- Initiate evacuation of schools in the 10-mile EPZ.
- Deploy field monitoring teams outside the 2-mile area to confirm that there is no release.
 - [SEOC will coordinate with the command post to bring field teams in closer as soon as it is tactically safe to do so.]

HAB General Emergency ECL Actions

Ensure all activities are implemented for the HAB alert and SAE ECL.

- Implement PAD by the state to shelter in place the 2-mile area and evacuate or shelter 5 miles downwind according to procedure.
- If a release occurs as a result of the hostile action, pull back and reevaluate current activities. This includes pulling back assets and regrouping in a safe location (outside of an affected sub area) away from the plant.
- [Conduct a conference call with command post, county and state EOCs to determine next steps.]
- State of Minnesota will initiate a request for a federal emergency declaration requesting emergency protective measures (category B) and direct federal assistance under the public assistance program.
- If control of the site is lost, the state will request direct federal assistance to take back control of the plant.

HAB-Specific Plan Updates Needed

State and county plans and procedures need to to define the following:

- Determine how credentialing will be established for emergency workers at or near the site.
- Identify how the integration of utility security staff and off-site response personnel will occur (providing prompt plant access for in-bound first responders).

HAB-Specific Considerations

Off-site and on-site emergency operation plans need to be synchronized and the following need to be agreed upon:

- 1. Coordination of staging areas for initial deployment and pre-staging of assets.
 - [There will be a need for two levels of staging: one for on-site response and one for regional pre-positioning of assets that will be deployed by various federal agencies.]
- 2. Plans need to identify the state and federal agency responsibilities for a HAB response.

