

June 25, 2007

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: Stephen D. Dingbaum */RA/*
Assistant Inspector General for Audits

SUBJECT: AUDIT OF NRC'S EMERGENCY PREPAREDNESS
PROGRAM (OIG-07-A-13)

Attached is the Office of the Inspector General's (OIG) report titled, *Audit of NRC's Emergency Preparedness Program*.

This report presents the results of the subject audit. Agency comments provided at the exit conference on June 6, 2007, have been incorporated, as appropriate, into this report. The agency did not provide formal comments.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG follow up as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at 415-5915, or Beth Serepca at 415-5911.

Attachment: As stated

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AUDIT REPORT

Audit of NRC's Emergency Preparedness Program

OIG-07-A-13 June 25, 2007



All publicly available OIG reports (including this report) are accessible through
NRC's Web site at:

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I. EXECUTIVE SUMMARY

BACKGROUND

Emergency Preparedness (EP) is one of the seven cornerstones of the Reactor Oversight Process, which is the Nuclear Regulatory Commission's (NRC) primary mechanism for nuclear power plant oversight. The objective of the EP cornerstone is to ensure that licensees operating nuclear power plants are capable of taking adequate measures to protect public health and safety during a radiological emergency.

NRC regulations require licensees to have comprehensive EP programs, which include dedicated emergency response facilities, systems, equipment, and staffing. Licensees must describe their programs in facility-specific plans that provide licensee staff with guidance for responding to a range of emergency situations. NRC inspectors assess the ability of licensees to execute specific elements of their EP plans such as coordination with offsite emergency response organizations during EP drills and exercises. Licensees conduct quarterly onsite EP drills, as well as biennial EP exercises that simulate emergencies and involve NRC as well as State and local authorities. During these exercises, the Federal Emergency Management Agency (FEMA) assesses State and local response organizations' implementation of their emergency plans.

PURPOSE

The objectives of this audit were to evaluate:

- 1) NRC's efforts to ensure that nuclear power plant licensees have adequate EP plans and programs for security-based emergencies, and;
- 2) NRC's coordination with Federal, State, and local authorities to plan and prepare for security-based emergencies.

RESULTS IN BRIEF

With respect to the first objective, NRC is making a sufficient effort to ensure that nuclear power plant licensees have adequate EP plans and programs. However, in regard to the second objective, this audit found a weakness within the EP program. Specifically, NRC has not followed a consistent process for communicating its coordination role with State and local government authorities.

Weakness in NRC's Coordination with State and Local Government Authorities

In the event of radiological emergencies that occur at nuclear power plants, NRC is responsible for supporting State and local emergency management organizations and coordinating the Federal Government's response under the *National Response Plan*. However, NRC has repeatedly demonstrated problems coordinating and communicating with State authorities during EP exercises. This weakness recurs because (1) NRC has not clearly defined and communicated its coordination role to State and local authorities, and (2) has not followed a consistent approach for working with the States during these exercises. Inadequate coordination and communication adversely affects NRC's emergency operations with State agencies and could diminish the public's confidence in NRC.

RECOMMENDATIONS

This report makes two recommendations to help NRC improve its emergency preparedness coordination with State agencies. These recommendations appear on page 10 of this report.

AGENCY COMMENTS

At an exit conference held on June 6, 2007, agency managers generally agreed with the audit findings and recommendations and provided comments concerning the draft audit report. We modified the report in response to these comments as we determined appropriate. NRC reviewed these modifications and opted not to submit formal written comments for the final version of this report.

ABBREVIATIONS AND ACRONYMS

| | |
|------|--|
| DHS | Department of Homeland Security |
| EP | Emergency Preparedness |
| FEMA | Federal Emergency Management Agency |
| FTE | full-time equivalent |
| MD | Management Directive |
| NSIR | Office of Nuclear Security and Incident Response |
| NRC | U.S. Nuclear Regulatory Commission |
| OIG | Office of the Inspector General |
| RSLO | Regional State Liaison Officer |

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I. BACKGROUND

Emergency Preparedness is one of the seven cornerstones of the Reactor Oversight Process, which is NRC's primary mechanism for nuclear power plant oversight. The objective of the EP cornerstone is to ensure that licensees operating nuclear power plants are capable of taking adequate measures to protect public health and safety during a radiological emergency.

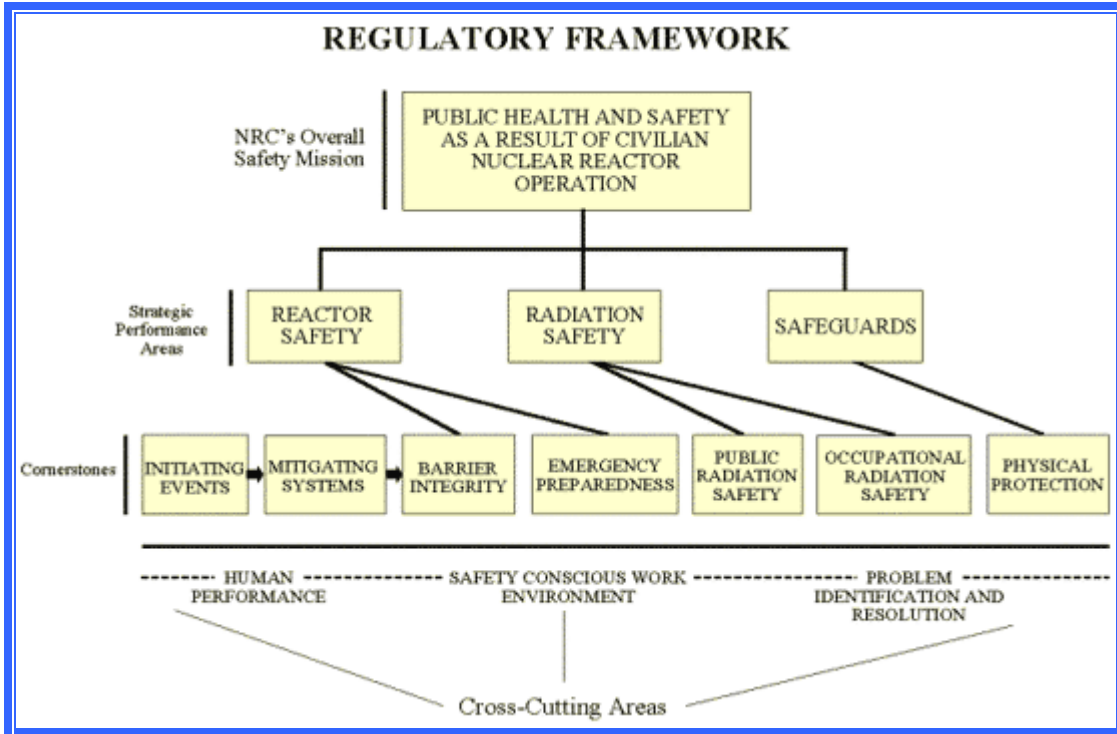


Figure 1: NRC's Regulatory Framework

NRC's Office of Nuclear Security and Incident Response (NSIR) manages this cornerstone by developing emergency preparedness policies, regulations, programs, and guidelines for currently licensed nuclear reactors and potential new nuclear reactors. NSIR EP staff issue internal and external communications and conduct inspections, licensing reviews, and regulation and guidance reviews. They also interface and coordinate with internal and external stakeholders including other NRC offices, the public, industry, the international nuclear community, and Federal and State government agencies. In FY 2006, NSIR's budget for preparedness and response activities was comprised of 85 full-time equivalent (FTE) staff and \$1.018 million. This resource allocation included funding for 60 NRC Headquarters personnel, and 25 FTE

at NRC Regional offices, including 2 FTE per regional office for conducting the portion of reactor safety inspections that addresses the EP cornerstone of the Reactor Oversight Process.

NRC Emphasis on Emergency Preparedness

Since the terrorist attacks of September 11, 2001, NRC has placed renewed emphasis on emergency planning and response, as evidenced by subsequent regulatory actions and participation in interagency initiatives. For example, NSIR staff:

- ❖ Issued orders to operating reactors in October 2002 to review and address enhancements to security and emergency preparedness programs.
- ❖ Issued generic communications to operating reactors in 2004 specific to security-related emergency preparedness enhancement lessons learned.
- ❖ Surveyed and provided information to nuclear power plant licensees in 2005 to determine how licensees have incorporated new security features into their emergency plans and programs.
- ❖ Reviewed existing EP regulations and guidance during 2006, and identified potential enhancements, particularly in the area of security.
- ❖ Participated in comprehensive reviews of security and emergency response capabilities around nuclear facilities.

NRC and the Federal Emergency Management Agency (FEMA)¹ Oversight of Emergency Preparedness

Both NRC and FEMA have roles in the emergency planning activities for nuclear power plants. NRC regulates the emergency planning activities within the physical boundaries of nuclear power plant facility perimeters. FEMA evaluates the emergency planning activities outside the physical boundaries of nuclear power plants.

¹ On March 1, 2003, the Federal Emergency Management Agency (FEMA) became part of the Department of Homeland Security (DHS). FEMA's continuing mission within the new department is to lead the effort to prepare the Nation for all hazards and effectively manage Federal response and recovery efforts following any national incident.

During biennial full-participation EP exercises, NRC evaluates licensees implementation of their emergency plans, while FEMA assesses State and local authorities' abilities to carry out offsite emergency plans.



Figure 2: NRC regulates the emergency planning activities within the physical boundaries of nuclear power plant facility perimeters.

NRC EP Oversight

NRC regulations require licensees to have comprehensive onsite² EP programs, which include dedicated emergency response facilities, systems, equipment, and staffing. Licensees must describe their EP programs in facility-specific plans and procedures that provide licensee staff with guidance for responding to a range of emergency situations, including natural disasters, operational accidents, and terrorist attacks.³ In fulfilling NRC's Reactor Oversight Process, NRC inspectors assess the ability of licensees to execute specific elements of their EP plans such as coordination with offsite emergency response organizations during EP drills and

² Onsite refers to emergency preparedness activities that occur within the perimeter of NRC licensed facilities such as nuclear power plants.

³ Emergency preparedness planning standards are contained in 10 CFR 50.47(b) and 10 CFR 50 Appendix E.

exercises. Licensees conduct periodic onsite EP drills, as well as biennial EP exercises that involve NRC and State and local authorities. Biennial exercises are evaluated by the NRC and FEMA. These biennial exercises simulate incidents that typically escalate in seriousness to a “general emergency,” the highest-level emergency category for nuclear power plants.

FEMA EP Oversight

FEMA oversees State and local authorities' offsite⁴ emergency plans and programs, which are designed to protect communities surrounding nuclear power plants. FEMA formulates determinations regarding the adequacy of offsite emergency preparedness. To determine whether offsite plans and programs are adequate and can be implemented during an actual emergency, FEMA evaluates the offsite performance of State and local authorities during EP biennial exercises. A memorandum of understanding between FEMA and NRC provides for NRC review and feedback concerning FEMA EP-related determinations and for the two agencies' collaboration in other areas of mutual interest.

II. PURPOSE

The audit objectives were to evaluate:

- 1) NRC's efforts to ensure that nuclear power plant licensees have adequate EP plans and programs for security-based emergencies.
- 2) NRC's coordination with Federal, State, and local authorities to plan and prepare for security-based emergencies.

See Appendix A for a description of the audit scope and methodology.

⁴ Offsite refers to emergency preparedness activities that occur outside the parameters of NRC licensed facilities.

III. FINDING

In regard to the first objective, NRC has completed EP initiatives over the past several years, and additional EP management initiatives are underway that will further enhance the EP program. The audit team observed biennial exercises at four nuclear power plants, interviewed EP inspectors, and gathered training documentation and found that NRC fulfills its EP exercise inspection requirements by:

- ❖ Routinely assessing licensees using criteria in the Reactor Oversight Process (IMC 0308).
- ❖ Staffing EP inspections with a lead inspector who has completed the agency's EP specialist training and supporting inspectors who have received specific EP training related to their inspection focus.

NRC is making a sufficient effort to ensure that nuclear power plant licensees have adequate EP plans and programs. No weaknesses were found regarding the first objective during the EP exercises that OIG observed.

In regard to the second objective, this audit found a weakness within the EP program. Specifically, NRC should improve its processes for communication of its coordination responsibilities with State and local government authorities during emergency preparedness exercises.

Weakness in NRC's Coordination with State and Local Government Authorities

In the event of radiological emergencies that occur at nuclear power plants, NRC is responsible for supporting State and local emergency management organizations and coordinating the Federal Government's response. However, NRC has repeatedly demonstrated problems coordinating with State authorities during EP exercises. The weakness in NRC's coordination with State authorities recurs because (1) NRC has not followed a consistent approach for working with the States during these exercises and (2) has not clearly defined or communicated its coordination role. Inadequate coordination adversely affects NRC's operations with State agencies during EP exercises and could diminish public confidence in NRC.

The *National Response Plan*⁵ is the Federal Government's plan for how Federal agencies should coordinate efforts to manage specific types of emergencies. The *National Response Plan* assigns NRC responsibility as the coordinating agency for the Federal response to nuclear or radiological emergencies occurring at nuclear power plants under NRC jurisdiction. The coordinating agency role includes supporting State, local, and tribal authorities, which are primarily responsible for managing public health and safety in communities surrounding nuclear facilities in case of emergency.

NRC's internal guidance identifies the agency's roles and responsibilities in accordance with the *National Response Plan*. The *NRC Incident Response Plan* reflects the agency's policy for responding to emergencies involving NRC-regulated facilities, and specifically addresses coordination with external organizations. At the Federal level, NRC coordinates actions of other agencies such as DHS, the Food and Drug Administration, Department of Energy, and the Environmental Protection Agency, which are involved in response and recovery operations, and advises key decisionmakers such as the President and the Congress. At the non-Federal level, NRC provides technical assistance and coordinates Federal support upon the request of State, local, and tribal authorities.

Management Directive and Handbook 8.2 (MD 8.2), "*NRC Incident Response Program*," identifies procedures for carrying out the *NRC Incident Response Plan* and assigns the roles and responsibilities of NRC organizations involved in implementing the plan. For instance, MD 8.2 requires that:

- ❖ NSIR develop, direct, and implement the *NRC Incident Response Plan*, including outreach elements to Federal, State, local, and tribal organizations.
- ❖ The Office of State and Tribal Programs⁶ assists NSIR in implementing the State outreach program to increase and improve NRC's interactions with State authorities during exercises and briefings. To support increased outreach efforts, the Office of State and Tribal Programs provided each regional

⁵ The *National Response Plan* addresses the objectives of the *National Strategy for Homeland Security*; Homeland Security Act of 2002; and Homeland Security Presidential Directive-5 (HSPD-5), *Management of Domestic Incidents*, by establishing in writing a concerted national effort to prevent terrorist attacks within the United States; reduce America's vulnerability to terrorism, major disasters, and other emergencies; and minimize the damage and recover from attacks, major disasters, and other emergencies that occur.

⁶ This office was merged with another office in October 2006 to create the Office of Federal and State Materials and Environmental Management Programs.

office with FTE resources for its Regional State Liaison Officer⁷ function as part of the FY 2007 budget allotment. Appendix B contains a chart that describes selected functions of the Regional State Liaison Officer in each regional office.

- ❖ Regional administrators support an outreach program to ensure that licensees and State, local, and tribal organizations are aware of the support that NRC and other Federal agencies can provide during emergencies.

Coordination Problems

NRC repeatedly demonstrates coordination problems with State authorities during EP exercises. Despite acknowledging in past evaluations of agency exercise performance that NRC has communicated poorly during EP exercises, NRC headquarters staff during subsequent exercises have not taken adequate steps to change NRC's methodology for its outreach and communications role with State authorities.

For example, during a March 2004 EP exercise, NRC headquarters staff repeatedly contacted State authorities directly to obtain status updates. These interruptions occurred despite protests from State officials that they lacked time and staff to accommodate NRC's information requests. After the exercise, State officials filed a complaint with DHS to document what they regarded as unnecessary NRC interference in their operations. NRC officials subsequently acknowledged the State officials' concerns and recommended a review of existing NRC procedures to determine whether revisions were appropriate. NRC officials also considered longer-term, programmatic initiatives to improve communications with State authorities, with specific focus on exercise preparation and outreach activities.

In May 2005, NSIR developed a program plan to integrate EP outreach activities that had previously been carried out by various NRC offices. Nevertheless, coordination problems recurred during subsequent EP exercises.

During an April 2006 EP exercise, a State official stated that a NRC headquarters executive caused problems by calling State executives at least five times to obtain status updates. DHS was grading the State's EP performance during this exercise; therefore NRC's calls were more of a nuisance than help to the State executives. Furthermore, State executives were preoccupied with

⁷ Regional State Liaison Officers are assigned to NRC regional offices, and report to their respective Regional Administrators.

their emergency management duties and had neither time nor need to speak directly with NRC headquarters staff. The State official commented that NRC's Regional State Liaison Officer observed that NRC's actions were disruptive and attempted to remedy the situation by advising the headquarters staff to direct communications through him.

NRC noted in its evaluation of this EP exercise that the NRC headquarters executives encountered internal difficulties when facilitating communications with key State decisionmakers and attributed these problems to limited participation by senior State executives. NRC's assessment of this exercise recommended that agency staff evaluate the means for improving interaction with States during EP exercises, but did not evaluate reasons why past corrective actions in this area had not been effective to remedy known problems.

More recently, NRC commented in its after action evaluation of a September 2006 exercise, that NRC headquarters executives performed a cumbersome change in authority, which impacted the overall executive team performance. This resulted in:

- ❖ State officials were kept waiting on the telephone for approximately 23 minutes while the incoming executive team director was briefed.
- ❖ The licensee was kept waiting during a prescheduled nonsecure video teleconference.

As a result, State officials were distracted from completing work related to the exercise. A DHS letter to NRC expressed concern over the quality and timing of NRC Headquarters actions taken during this exercise when not needed. NRC's assessment of the exercise acknowledges that headquarters coordination problems compromised communication with State officials.

To further assess NRC's communication and coordination with State governments in the area of EP, OIG surveyed 43 State emergency management officials. Among the 31 officials who responded to this survey, 27 indicated that they had participated in EP exercises with NRC. Of the 27 State officials, 9 described communication problems that occurred during the 3 exercises previously discussed. Concerns among this group included the adequacy of pre-exercise coordination with NRC headquarters staff, as well as the timing and appropriateness of NRC headquarters' communications. Several of these respondents acknowledged that NRC staff had met with State officials following the exercises to address State concerns.

NRC Roles Not Consistent or Defined

The weakness in NRC's coordination with State authorities recurs because NRC has not followed a consistent approach for working with State officials to plan and conduct EP exercises. Furthermore, NSIR has not clearly defined or communicated NRC's emergency response roles and responsibilities to State officials in its EP outreach efforts.

Inconsistencies occur regarding NRC's interactions with State and local officials, particularly in the areas of advance planning and involvement in exercises. NRC Regional State Liaison Officers interact regularly with State and local officials within their respective regions, yet interaction between headquarters-based NRC staff and State and local officials is inconsistent. Also, while NRC Regional State Liaison Officers' specific duties vary across the four NRC regions, all play an EP outreach role, such as representing NRC at emergency planning conferences involving State and Federal Government officials. During EP exercises, however, a single agency position has not been identified to serve as the primary interface between their State government counterparts and NRC headquarters. In addition, NRC does not always conduct advance or consistent preparation to clarify roles and responsibilities of the various organizations involved in EP exercises. Lastly, the scope of NRC's participation in EP exercises varies; sometimes agency staff are observers, while on other occasions, they are actively engaged as role players in the exercise scenarios.

Senior NSIR officials recognize that the *National Response Plan* and NRC's implementing guidance are unclear in stating NRC's mission as a Federal coordinating agency and therefore have initiated several measures to define and communicate the agency's role with external stakeholders.

In January 2006, NSIR proposed tentative plans for updating internal guidance, conducting tabletop exercises, and hosting regional conferences designed to help NRC, Federal, and State government officials better understand mutual EP roles and responsibilities. These activities are to reflect expected changes in a forthcoming revision of the *National Response Plan*.

Impact of Coordination on Public Confidence

Inadequate coordination adversely affects NRC's operations with State agencies during EP exercises and could diminish public confidence in NRC. Communication problems between NRC and State emergency management counterparts compromise State agency performance in EP exercises. Exercises typically simulate, within a 6- to 8-hour period, incidents that would likely occur over several days. Given these compressed timelines, State officials operating with limited staff may lack time and personnel to resolve communications problems or coordinate their activities with NRC. Moreover, DHS evaluates State agency performance during EP exercises, so State officials must focus their efforts on their primary duties and demonstrate DHS evaluation objectives, which do not include communications with NRC.

Ineffective communications also are reflected by comments made by State officials surveyed by OIG. For example, three officials surveyed complained that NRC had inappropriately asserted a command role rather than a support role during exercises. Two other officials surveyed said that they lacked an understanding of NRC's mission because NRC staff had not explained to them how the agency could provide support. Overall, nearly half of all survey respondents recommended that NRC increase staff interaction with State agencies through activities such as regular drill and exercise participation, site-visits, and regional conferences. These types of outreach activities foster better understanding of NRC's mission, thereby improving public confidence in the agency.

Recommendations:

OIG recommends that the Executive Director for Operations:

1. Identify, clarify in NRC policy, and communicate to internal and external stakeholders, NRC's coordination role and responsibilities under the National Response Plan.
2. Develop and implement a consistent approach for carrying out NRC's coordination role and responsibilities in accordance with the National Response Plan.

IV. AGENCY COMMENTS

At an exit conference held on June 6, 2007, agency managers generally agreed with the audit findings and recommendations and provided comments concerning the draft audit report. We modified the report in response to these comment as we determined appropriate. NRC reviewed these modifications and opted not to submit formal written comments for the final version of this report.

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SCOPE AND METHODOLOGY

Auditors evaluated NRC's EP program to determine the effectiveness of the program since the EP program was integrated with NSIR's Incident Response Program in June 2004.

OIG audit team reviewed relevant internal agency criteria, such as NRC's inspection and training procedures, management directives and Commission guidance. The OIG audit team also reviewed relevant laws and regulations pertaining to emergency preparedness.

Auditors interviewed NSIR to learn their roles and responsibilities as they pertain to EP. Auditors also interviewed EP inspectors in Regions I, II, III, and IV to assess their understanding of the EP program and process to determine if their activities are conducted in accordance with program requirements.

Auditors observed EP exercises at Columbia Generation Station, Palisades Nuclear Power Plant, Pilgrim Nuclear Power Station, and North Anna Nuclear Power Station and interviewed licensee EP Managers at those locations. Auditors also observed an EP exercise at the NRC Headquarters Operations Center.

To assess NRC's interaction with State agencies in the area of EP, OIG auditors analyzed relevant internal and external guidance, analyzed internal documentation of the agency's participation in EP exercises, and interviewed agency officials responsible for external outreach. In addition, auditors created a questionnaire and distributed it by e-mail to 43 State emergency management officials. These officials were identified as cognizant points of contact by NRC Regional State Liaison Officers. OIG received responses directly from, or on behalf of, 30 State officials from all four NRC regions.⁸ As appropriate, OIG contacted respondents by telephone to clarify remarks submitted in the questionnaire's narrative sections.

This work was conducted from September 2006 through March 2007, in accordance with generally accepted Government auditing standards and included a review of management controls related to audit objectives. The work was conducted by Beth Serepca, Team Leader; Shyrl Coker, Audit Manager; Vicki Foster, Senior Management Analyst; David Ditto, Senior Management Analyst; and Paul Rades, Senior Management Analyst.

⁸ Four respondents indicated that they had not participated in an EP exercise with NRC.

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Appendix B

SELECTED REGIONAL STATE LIAISON OFFICER (RSLO) FUNCTIONS⁹

| RSLO Function/Responsibility | Similarities Between the Four Regions | Differences Between the Four Regions |
|--|---------------------------------------|---|
| Frequent contacts with States to provide information | Role consistent in all four regions | Wide variation in involvement/interest by the States; thus, the time demands of this effort vary considerably. Some Regions have more than one RSLO to perform activities. |
| Responds to requests from staff and management regarding State issues and political inquiries; supports meetings before government officials | Role consistent in all four regions | Level of effort varies considerably, with the most significant demands in Region I, followed by Region III |
| Serves as the Government Liaison Manager during exercises and emergencies | Role consistent in all four regions | Region I RSLO also is Protective Measures and emergency response coordinator qualified; the Region IV RSLO has additional duties. |
| Attends regularly scheduled meetings in specific states - typically requested by the State | No similarities | <p>Region I supports two separate, regularly scheduled quarterly emergency management meetings plus two annual meetings on nuclear plant status and issues and quarterly State emergency management meetings</p> <p>Region II does not have such regularly scheduled meetings</p> <p>Region III supports one regularly scheduled quarterly meeting and one annual meeting</p> <p>Region IV supports one regularly scheduled quarterly meeting as well as one annual meeting</p> |
| Participates as a FEMA evaluator for biennial exercises and reviews final FEMA exercise reports. | Some similarities | <p>Region I covers three FEMA- Regions; RSLO covers 2-3 biennial exercises and serves as FEMA evaluator when needed.</p> <p>Region II covers two FEMA - Regions</p> <p>Region III covers two FEMA - Regions; RSLO covers 3-4 exercises per year</p> <p>Region IV covers five FEMA - Regions; RSLO covers 3-4 exercises per year.</p> |
| Supports the coordinated scheduling of emergency exercises | Some similarities | <p>The Region I RSLO has a central role in planning this activity.</p> <p>Regions II, III, and IV, FEMA has assumed the lead for this activity and the RSLO has only a supporting role</p> <p>Region IV RSLO coordinates this activity for its licensees, but RSLO remains in a support role.</p> |

⁹ Adapted from NRC memorandum dated October 13, 2006, *Regional State Liaison Officer Benchmarking/Best Practices Initiative*.