STATE OF MICHIGAN
BOARD OF COMMISSIONERS OF THE COUNTY OF ALLEGAN

January 14, 2010

EMERGENCY MANAGEMENT—APPROVE EMERGENCY OPERATIONS PLAN

WHEREAS, averting the threat of, or minimizing the effects of natural, technological and/or man-made disasters upon Allegan County lives and property is an appropriate governmental responsibility best addressed by the creation, communication, and implementation of an Emergency Operations Plan; and

WHEREAS, the preparedness to cope with the threat of, or the effects of a disaster requires an integrated deployment of public, private and individual citizen resources through an integrated emergency management system; and

WHEREAS, the National Incident Management System (NIMS) recognizes the potential deployment of various multi-jurisdictional resources to respond to a disaster, or threat thereof, and provides a coordinated organizational structure that will assure a consistent, nationwide, emergency management response regardless of the cause, size or complexity of a disaster; and

WHEREAS, the Allegan County Emergency Operation Plan is responsive to the federal requirements contained in the NIMS and subject to approval by the State of Michigan and the Federal Emergency Management Agency (FEMA); and
WHEREAS, pursuant to Act 390 of the P.A. of 1990, Allegan County has established the Allegan County Emergency Management Division and, to the limits of its capabilities, the Emergency Management Division is responsible for the disaster preparedness activities within Allegan County.

THEREFORE, BE IT RESOLVED that the Allegan County Board of Commissioners hereby approves the 2010 Emergency Operations Plan as presented January 14, 2010; and

BE IT FURTHER RESOLVED, that the approved Emergency Operations Plan is to be filed in the Clerk’s Office at the Allegan County Courthouse; and

BE IT FINALLY RESOLVED, that the Board Chairman is authorized to sign the necessary documents on behalf of the County.
**Work Order**

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<tr>
<th>Summary</th>
<th>EM_request signature on the Emergency Operation Plan (EOP) by Board Chairman</th>
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<tbody>
<tr>
<td>Requestor</td>
<td>Scott Corbin</td>
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<td>Requestor Call Back Number</td>
<td>2401</td>
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<tr>
<td>Department</td>
<td>Emergency Management</td>
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<td>Location</td>
<td>Dumont</td>
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<tr>
<td>Assigned Technician</td>
<td>Becky Blaine</td>
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<td>1/4/2010 3:09:51PM</td>
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<td>1/5/2010 9:24:05AM</td>
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<tr>
<td>Expected Completion Date</td>
<td>1/28/2010 3:23:21PM</td>
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**Work Order Description**

1/4/2010 3:30:02PM ALLEGANCOUNTY\SCorbin

As always this is considered a "Sensitive Document" and should not be shared with the public. Any request to review this document by the public should go through the approved FOIA process.

1/4/2010 3:09:51PM ALLEGANCOUNTY\SCorbin

This is to request the Board of Commission to approve a current copy of the EOP. There were minor changes to the plan as noted on the "Record of Change" Most of the changes were grammar and moving our worker decontamination site. This must be approved before our first Palisades Exercise by January 27, 2010. I have attached a copy of the FEMA Region 5 approval, a sample resolution and mailed a CD copy of the plan to County Administration for review.

**Technician**

1/8/2010 3:23:16PM BBLAINE

Placed on 1/14/10 BOC for discussion. Emailed BOC regarding available CD to review plan prior to BOC meeting. Notified requestor.

1/6/2010 7:55:30AM JNANCE

Received Word version of Basic Plan pages of document from requester and attached it to this workorder. Page 20 of that section of the document also requires a signature. Printed that page and forwarded to B Blaine for the pending signature file so that it is signed in addition to the Promulgation Statement following Board review and approval of the EOP.

1/5/2010 2:13:35PM JNANCE

Original of Promulgation Statement forwarded to B Blaine for pending signature file and cd of EOP received and forwarded to B Blaine to be held in Admin for Commissioners to access to review.

1/5/2010 1:43:33PM DSTAN

ET Review - as discussion on 1/14/10 agenda. DBV has call into SCorbin to see if LEPC or some other committee has reviewed and approved the document; RS wants them to be present at the meeting to go through any questions board may have at that time. We can send it out via email to BOC ahead of time; do not post to website.

1/5/2010 9:25:04AM JNANCE

Sent email to requester regarding the documents signed when the 2008 EOP was approved to ask if those same documents will need to be signed/inserted into the hard copy of the EOP. Was able to open the FEMA and State approval document to re-save it. Deleted original attachment and added the re-saved document. All appropriate documentation is attached. Assign to B Blaine for ET review and then Board agenda action item. Noted to DS that this may need ET review now to be placed on 1/14/10 agenda.

1/5/2010 9:02:19AM JNANCE

Attached draft resolution and as support documentation a copy of BOC action 9/11/08 to approve the 2008 and the two additional documents signed at that time.

Powered by Track-It!
Appropriate documentation attached, but unable to open the FEMA Region 5 approval document. Sent email to requester to ask why that file is so large. Also, need to clarify if the resolution. In the past rather than the our standard resolution format, they asked that the form provided by them be signed.

Resolution

1/4/2010  3:09:51PM   ALLEGANCOUNTY\SCorbin

Administrative Time- .25 hours
This is to request the Board of Commission to approve a current copy of the EOP. There were minor changes to the plan as noted on the "Record of Change". Most of the changes were grammar and moving our worker decontamination site. This must be approved before our first Palisades Exercise by January 27, 2010. I have attached a copy of the FEMA Region 5 approval, a sample resolution and mailed a CD copy of the plan to County Administration for review.
October 22, 2009

Mr. Scott Corbin  
Emergency Management Coordinator  
 Allegan County Emergency Management  
3271 122nd Avenue  
Allegan, Michigan 49010

Dear Mr. Corbin:

For your review, enclosed please find correspondence from FEMA detailing their plan review of the Allegan County Emergency Operations Plan revision dated September 11, 2008.

If you have any questions, please call me at (517) 336-6435.

Sincerely,

James R. Porcello  
Planning and Program Development Section Commander  
Emergency Management and Homeland Security Division

JRP:AW:dl  
Enclosure
July 27, 2009

Captain W. Thomas Sands
Deputy State Director of Emergency Management and Homeland Security
Michigan Department of State Police
Emergency Management and Homeland Security Division
4000 Collins Road
Lansing, Michigan 48910-5883

Dear Captain Sands:

The Regional Assistance Committee has completed the review of the updated Allegan County Emergency Operations Plan Revision, dated September 11, 2008, site specific to the Palisades Nuclear Power Plant.

We concur with the State’s assessment that no significant changes have been made to the Concept of Operations for the Emergency Operations Plan For Allegan County, and that the plan is in compliance with NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness In Support of Nuclear Power Plants.

If you have any questions, please contact me at (312) 408-5575 or Clinton E. Crackel at (312) 408-5545.

Sincerely,

[Signature]

William E. King, Chief
Regional Assistance Committee

Enclosure

Cc: Mr. Thomas Higinbotham w/Enclosure
GENERAL COMMENTS

1. All references to the “NRP” should be changes to “NRF” (National Response Framework).

2. Recommend devising and implementing a page numbering system for the TABS & RESOURCES section of the plan. Such a system would enable the reader to locate desired information more quickly. Perhaps TR-1, TR-2, TR-3, etc, would be a practical means of numbering the pages.

PLANNING CRITERIA
NUREG 0654 / FEMA-REP-1 Rev.1

Planning Standard and Evaluation Criteria

A. Assignment of Responsibility (Organization Control)

1.a. Each plan shall identify the State, local, Federal, and private sector organizations (including utilities) that are intended to be part of the overall response organizations for Emergency Planning Zones.

Adequate

b. Each organization and suborganization having an operational role shall specify its concept of operations, and its relationship to the total effort.

Adequate

c. Each plan shall illustrate these interrelationships in a block diagram.

Adequate

d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS
PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.IV.A.1-6, Pg RAD 4-11” to read “Radiological Incident Annex, Sec.IV.A.1-6, Pg RAD 4-12”.

e. Each organization shall provide for 24-hour per day emergency response, including 24-hour per day monitoring of communications links.

Adequate

2. Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other.

Adequate

b. Each plan shall contain (by reference) to specific acts, codes or statutes the legal basis for such authorities.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Basic Plan, Sec.I.C.1-3, Pg BP-2-4” to read “Basic Plan, Sec.I.C.1-3, Pg BP-2-5”.

3. Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered.
by laws, regulations, or executive orders where separate written agreements are not necessary.

*Adequate with comments.*

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Basic Plan, Sec.X, Pg BP-18" to read "Basic Plan, Sec.X, Pg BP-20".

4. Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity or resources (technical, administrative, and material) shall be specified by title.

*Adequate*

B. Onsite Emergency Organization

*This Planning Standard is applicable to the Licensee only.*

C. Emergency Response Support and Resources

1. The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following:

1.a. specific person by title authorized to request Federal assistance; see A.1.d, A.2.a.

*This Evaluation Criterion is not applicable to local plans.*

b. specific Federal resources expected including expected times of arrival at specific nuclear facility sites; and

*This Evaluation Criterion is not applicable to local plans.*

c. specific licensee, State and local resources available to support the Federal response, e.g., air fields, command posts, telephone lines, radio frequencies and telecommunications centers.
Adequate

2.a. Each principal offsite organization may dispatch representatives to the licensee's near-site Emergency Operations Facility (State technical analysis representatives at the nearsite EOF are preferred.)

This Evaluation Criterion is not applicable to local plans.

b. This Evaluation Criterion is applicable to the Licensee only.

3. Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.

This Evaluation Criterion is not applicable to local plans.

4. Each organization shall identify nuclear and other facilities, organizations, or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

Adequate

D. Emergency Classification System

1. This Evaluation Criterion is applicable to the Licensee only.

2. This Evaluation Criterion is applicable to the Licensee only.

3. Each State and local organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility licensee.

Adequate

4. Each State and local organization should have procedures in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local offsite conditions that exist at the time of the emergency.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page
Column: Change “Radiological Incident Annex, Sec.IIIA-H, Pg RAD 4-10” to read “Radiological Incident Annex, Sec.IIIA-H, Pg RAD-4 - 11”.

E. Notification Methods and Procedures

1. Each organization shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.

   Adequate

2. Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.

   Adequate

3. **This Evaluation Criterion is applicable to the Licensee only.**

4.a-e. **These Evaluation Criteria are applicable to the Licensee only.**

5. State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and followup messages received from the licensee including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

   Adequate

6. Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. (See Appendix 3.) It shall be the licensee’s responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

   Adequate

7. Each organization shall provide written messages intended for the public, consistent with the licensee’s classification scheme. In particular, draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans. Such message should include the appropriate protection, e.g., handkerchief over the mouth, thyroid blocking or evacuation. The role of the licensee is to provide supporting information for the messages. For ad hoc

Adequate

F. Emergency Communications

1. The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be compatible with one another. Each plan shall include:

   1.a. provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions.

Adequate

b. provision for communications with contiguous State/local governments within the Emergency Planning Zones;

Adequate

c. provision for communications as needed with Federal emergency response organizations;

Adequate

d. provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams;

Adequate

e. provision for alerting or activating emergency personnel in each response organization; and

Adequate

f. This Evaluation Criterion is applicable to the Licensee only.

2. Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exists.
Adequate

3. Each organization shall conduct periodic testing of the entire emergency communication system (see evaluation criteria H.10, N.2.a and Appendix 3).

Adequate

G. Public Education and Information

1. Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:

   a. educational information on radiation;
   b. contact for additional information;
   c. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radioprotective drugs; and
   d. special needs of the handicapped.

Means for accomplishing this dissemination may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; posting in public areas; and publications distributed on an annual basis.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Add “See Annual Public Information Distribution and News Media Briefing under Tabs & Resources.”

2. The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated at least annually. Signs or other measures (e.g., decals, posted notice or other means, place in hotels, motels, gasoline stations and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.
Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "ESF #3 (Public Information & Warning), Sec.A.1-9, Pg. 1, 2" to read "ESF #3 (Public Information & Warning), Sec. II.A.1-9, Pg. 1, 2".

3.a. Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

Adequate with comments.

Add one more reference in the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: “Radiological Incident Annex, Sec.IV.A.6, Pg RAD-4 - 12”.

b. This Evaluation Criterion is applicable to the Licensee only.

4.a. Each principal organization shall designate a spokesperson who should have access to all necessary information.

Adequate

b. Each organization shall establish arrangements for timely exchange of information among designated spokespersons.

Adequate

c. Each organization shall establish coordinated arrangements for dealing with rumors.

Adequate

5. Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

Adequate

H. Emergency Facilities and Equipment

8
1. This Evaluation Criterion is applicable to the Licensee only.

2. This Evaluation Criterion is applicable to the Licensee only.

3. Each organization shall establish an emergency operations center for use in directing and controlling response functions. 
Adequate

4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.
Adequate

5. a-d These Evaluation Criteria are applicable to the Licensee only.

6. a-c. These Evaluation Criteria are applicable to the Licensee only.

7. Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.
Adequate with comments.

Add one more reference in the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: “Radiological Incident Annex, Sec.III.E.1, Pg RAD-8”.

8. This Evaluation Criterion is applicable to the Licensee only.

9. This Evaluation Criterion is applicable to the Licensee only.

10. Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipments.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING
STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.IV.B.3.h.i, Pg RAD 13” to read “Radiological Incident Annex, Sec.IV.B.2.b, Pg. RAD-13”.

11. Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies).

Adequate

12. Each organization shall establish a central point (preferable associated with the licensee’s near-site Emergency Operations Facility), for the receipt and analysis of all field monitoring data and coordination of sample media.

Adequate

I. Accident Assessment

1-6. These Evaluation Criteria are applicable to the Licensee only.

7. Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

Adequate

8. Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, IL PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.III.6, Pg RAD 9” to read “Radiological Incident Annex, Sec.III.F.6, Pg. RAD-9”.

9. Each organization shall have a capability to detect and measure radiiodine concentrations in air in the plume exposure EPZ as low as $10^{-7}$ uCi/cc (microcuries
per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

This Evaluation Criterion is not applicable to local plans.

10. Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.

This Evaluation Criterion is not applicable to local plans.

11. Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.

This Evaluation Criterion is not applicable to local plans.

J. Protective Response

1.a-d These Evaluation Criteria are applicable to the Licensee only.

2. This Evaluation Criterion is applicable to the Licensee only.

Therefore, remove this Plan Review Element and Plan Section & Page response.

3.-8. These Evaluation Criteria are applicable to the Licensee only.

9. Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria. This shall be consistent with the recommendations of EPA regarding exposure resulting from passage of radioactive airborne plumes, (EPA-520/1-75-001) and with those of DHEW (DHHS)/FDA regarding radioactive contamination of human food and animal feeds as published in the Federal Register of December 15, 1978 (43 FR 58790).

Adequate

10. The organization’s plans to implement protective measures for the plum exposure pathway shall include:
a. Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system describe in the plan);

Adequate

b. Maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format);

Adequate

c. Means for notifying all segments of the transient and resident population;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “ESF #3 (Public Information & Warning), Sec.III.A & B, Pg 4, 5” to read “ESF #3 (Public Information & Warning), Sec.III.A & B, Pg. ESF 3-3 - 5”.

d. Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement;

Adequate

e. Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation maybe infeasible or very difficult, including quantities, storage, and means of distribution.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.IV.B.7.b, Pg RAD 16” to read “Radiological Incident Annex, Sec.IV.B.7.b, Pg RAD-17”.
f. State and local organizations’ plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the predetermined conditions under which such drugs may be used by onsite emergency workers;

**Adequate with comments.**

In the **ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.IV.B.7.b, Pg RAD 16” to read “Radiological Incident Annex, Sec.IV.B.7.b, Pg RAD-17”**.

g. Means of relocation;

**Adequate**

h. Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone; (See J.12).

**Adequate**

i. Projected traffic capacities of evacuation routes under emergency conditions;

**Adequate with comments.**

In the **ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “ESF #4 (Transportation & Evacuation), Sec.II.D.1-8, Pg 6” to read “ESF #4 (Transportation & Evacuation), Sec.II.A.8.a-d, Pg ESF 4-2, 4-3”**.

In the **ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Add “Tabs & Resources, Estimated Vehicle Capacities of Major Evacuation routes.”**
In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Add "Tabs & Resources, Palisades 10-Mile EPZ Evacuation Time Estimates in Minutes."

j. Control of access to evacuated areas and organization responsibilities for such control;

Adequate

k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures;

Adequate

1. Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (See Appendix 4); and

Adequate

m. The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units or other shelter for direct and inhalation exposures, as well as evacuation time estimates.

This Evaluation Criterion is not applicable to local plans.

11. Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, produce diversion, and preservation. Maps for recording survey and monitoring data, key land use data (e.g., farming), dairies, food processing plants, water sheds, water supply intake and treatment plants and reservoirs shall be maintained. Provisions for maps showing detailed crop information may be by including reference to their availability and location and a plan for their use. The maps shall start at the facility and include all of the 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process milk products and other large amounts of food
or agricultural products originating in the ingestion pathway Emergency Planning Zone, but located elsewhere, shall be maintained.

This Evaluation Criterion is not applicable to local plans.

12. Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

Adequate

K. Radiological Exposure Control

1. & 2. These Evaluation Criteria are applicable to the Licensee only.

3.a. Each organization shall make provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.III.G.8, Pg RAD 9" to read "Radiological Incident Annex, Sec.III.G.6-8, Pg RAD-9, 10".

b. Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accidents.

Adequate

4. Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).

Adequate

5.a. Each organization, as appropriate, shall specify action levels for determining the need for decontamination.
Adequate

b. Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.

Adequate

6 & 7, These Evaluation Criteria are applicable to the Licensee only.

L. Medical and Public Health Support

1. Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

Adequate

2. This Evaluation Criterion is applicable to the Licensee only

3. Each State shall develop lists indicating the location of public, private and military hospitals and other emergency medical services facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contamination personnel, and have facilities and trained personnel able to care for contaminated injured persons.

This Evaluation Criterion is not applicable to local plan.

4. Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

Adequate

M. Recovery and Reentry Planning and Postaccident Operations

1. Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

Adequate with comments.
In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.III.H.1.a-L, Pg RAD 10,11" to read "Radiological Incident Annex, Sec.III.H.1.a-i, Pg RAD-10, 11."

2. **This Evaluation Criterion is applicable to the Licensee only.**

3. Each licensee and State plan shall specify means for informing members of the response organization that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

**This Evaluation Criterion is not applicable to local plans.**

4. Each plan shall establish a method for periodically estimating total population exposure.

**This Evaluation Criterion is not applicable to local plans.**

N. **Exercises and Drills**

1.a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

*Adequate with comments.*

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.E.1, Pg RAD 20" to read "Radiological Incident Annex, Sec.VI.D.1, 2, Pg RAD-20."

b. An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the annual exercise by Federal and State observers/evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five-year period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and
6:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannounced.

**Adequate with Comments.**

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VLD.1, Pg RAD 20” to read “Radiological Incident Annex, Sec.VLD.1, Pg RAD-20.”

2. A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. A drill shall be supervised and evaluated by a qualified drill instructor. Each organization shall conduct drills, in addition to the annual exercise at the frequencies indicated below:

a. **Communication Drills**

Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local emergency operations centers, and field assessment teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages.

**Adequate with comments.**

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VLD.2,3, Pg RAD 20” to read “Radiological Incident Annex, Sec.VLD.2,3, Pg RAD-19.”

b. **Fire Drills**

*This Evaluation Criterion is applicable to the Licensee only.*

c. **Medical Emergency Drills**
A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by the local support services agencies (i.e., ambulance and offsite medical treatment facility) shall be conducted annually. The offsite portions of the medical drill may be performed as part of the required annual exercise.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.3, Pg RAD 20” to read “Radiological Incident Annex, Sec.VII.D.1, Pg RAD-19.”

d. Radiological Monitoring Drills

Plant environs and radiological monitoring drills (on-site and off-site) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.

This Evaluation Criterion is limited to the Licensee and State of Michigan. There is no local involvement. Therefore this Evaluation Criterion is not applicable to local plans. Therefore, Allegan County should eliminate this Plan Review Element and Plan Section & Page reference.

e. Health Physics Drills

(1) Health Physics drills shall be conducted semi-annually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. The State drills need not be at each site.

This Evaluation Criterion is not applicable to local plans.

(2) This Evaluation Criterion is applicable to the Licensee only.

3. Each organization shall describe how exercise and drills are to be carried out to allow free play for decision making and to meet the following objectives. Pending the development of exercise scenarios and exercise evaluation guidance by NRC and FEMA the scenario for use in exercises and drills shall include but not be limited to, the following:
a. The basic objective(s) of each drill and exercise and appropriate evaluation criteria:

In the Allegan County EOP, Radiological Incident Annex Add: VII.C.4.a, b, c, d, e and f to address the following:

a. The basic objective(s) of each drill and exercise and appropriate evaluation criteria;

b. The date(s), time period, place(s) and participating organizations;

c. The simulated events;

d. A time schedule of real and simulated initiating events;

e. A narrative summary describing the conduct of the exercise or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities; and

f. A description of the arrangement for and advance materials to be provided to official observers.

Then change all Plan Section & Page references to reflect the revisions in the Allegan County EOP.

b. The date(s), time period, places (s) and participating organizations:

See recommendation to N.3.a.

c. The simulated events:

See recommendation to N.3.a.

d. A time schedule of real and simulated initiating events:

See recommendation to N.3.a.

e. A narrative summary describing the conduct of the exercise or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities; and

See recommendation to N.3.a.

f. A description of the arrangement for and advance materials to be provided to official observers.
See recommendation to N.3.a.

4. Official observers from Federal, State or local governments will observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.E.1, Pg RAD 20” to read “Radiological Incident Annex, Sec.VII.D.1, Pg RAD-20.” Also, add one more sentence to state “Exercises will be observed, evaluated and critiqued per the requirements of FEMA Guidance Memorandum PR-1.”

5. Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.E.1, Pg RAD 20” to read “Radiological Incident Annex, Sec.VII.D.1, Pg RAD-20.”

O. Radiological Emergency Response Training

1. Each organization shall assure the training of appropriate individuals.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF
RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VII.B, Pg RAD-19.”

a. This Evaluation Criterion is applicable to the Licensee only.

b. Each offsite response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police and ambulance/rescue, the training shall also be offered to the other departments who are members of the mutual aid district.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VII.B, Pg RAD-19.”

2.&3. These Evaluation Criteria are applicable to the Licensee only.

4. Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. The specialized initial training and periodic retraining programs (including the scope, nature and frequency) shall be provided in the following categories:

a. Directors or coordinators of the response organizations;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VII.B.1, Pg RAD-19.”

b. Personnel responsible for accident assessment;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS
PLAN ALLEGAN COUNTY PLAN REFERENCES, IL PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19" to read "Radiological Incident Annex, Sec.VII.B.1, Pg RAD-19."

c. Radiological monitoring teams and radiological analysis personnel;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19" to read "Radiological Incident Annex, Sec.VII.B.1, Pg RAD-19."

d. Police, security and fire fighting personnel;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19" to read "Radiological Incident Annex, Sec.VII.B.1, Pg RAD-19."

e. This Evaluation Criterion is applicable to the Licensee only

f. First aid and rescue personnel;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19" to read "Radiological Incident Annex, Sec.VII.B.1, Pg RAD-19."
g. Local support services personnel including Civil Defense/Emergency Service personnel;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VIC.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VIC.1, Pg RAD-19.”

h. Medical support personnel;

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VIC.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VIC.1, Pg RAD-19.”

i. This Evaluation Criterion is applicable to the Licensee only

j. Personnel responsible for transmission of emergency information and instructions.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VIC.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VIC.1, Pg RAD-19.”

5. Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS
P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

1. Each organization shall provide for the training of individuals responsible for the planning effort.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VI.B.2, Pg RAD-19.”

2. Each organization shall identify by title the individual with the overall authority and responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change “Radiological Incident Annex, Sec.VI.C.1, Pg RAD 19” to read “Radiological Incident Annex, Sec.VI.B.1, Pg RAD-19.”

3. Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.

Adequate wit comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF
RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.A, Pg RAD 19" to read "Basic Plan, Sec.VIII.A, Pg BP-19."

4. Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: Change "Radiological Incident Annex, Sec.VI.A, Pg RAD 19" to read "Basic Plan, Sec.VIII.B, Pg BP-19."

5. The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

Adequate

6. Each plan shall contain a detailed listing of supporting plans and their source.

Adequate

7. Each plan shall contain as an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.

Adequate with comments.

In the ANNOTATION OF NUREG 0654, FEMA REP.1 PLANNING ELEMENTS IN THE ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN ALLEGAN COUNTY PLAN REFERENCES, II. PLANNING STANDARDS AND EVALUATION CRITERIA, A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL), Plan Section & Page Column: The reference to Tabs and Resources is incorrect. According to the EOP Table of Contents, Appendices to the Basic Plan are located on pgs. BP-19 and BP-21. It is recommended the page number of the appendices be change to a format that is not so confusing with the page numbers of the Basic Plan, i.e. BP-1-1 for Appendix 1 to Basic Plan, page 1. Also, the second page number "iv" of the Table of Contents should be renumbered to "vi."
8. Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these criteria.

Adequate

9. This Evaluation Criterion is applicable to the Licensee only.

10. Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly.

Adequate
WHEREAS, averting the threat of or minimizing the effects of natural, technological and/or man-made disasters upon Allegan County lives and property is an appropriate governmental responsibility best addressed by the creation, communication, and implementation of an Emergency Operations Plan, and

WHEREAS, the preparedness to cope with the threat or effects of a disaster requires an integrated deployment of public, private, and individual citizen resources through an integrated emergency management system, and

WHEREAS, the National Incident Management System (NIMS) recognizes the potential deployment of various, multi-jurisdictional resources to respond to a disaster, or threat thereof, and provides a coordinated organizational structure that would assure a consistent, nationwide, emergency management response regardless of the cause, size and complexity of a disaster, and

WHEREAS, the Allegan County Emergency Operations Plan is responsive to the federal requirements contained in the NIMS and subject to approval by the State of Michigan and the Federal Emergency Management Agency (FEMA), and

WHEREAS, pursuant to Act 390 of the P.A. of 1990, Allegan County has established the Allegan County Emergency Management Division (EMD), and that the EMD is, to the limits of its capabilities, responsible for the disaster preparedness activities within Allegan County.

NOW THEREFORE IT IS RESOLVED, ORDERED AND DETERMINED, that the Allegan County Board of Commissioners does hereby approve and adopt the Allegan County Emergency Operations Plan, which is filed in the Clerk’s Office at the Allegan County Courthouse in Allegan, Michigan, and which is incorporated herein by this reference.

PASSED AND ADOPTED by the Allegan County Board of Commissioners, State of Michigan, this __________ day of ______________, 20__.  

SIGNATURES

______________________________  ________________________________
Chairperson,            Director, Allegan County Emergency Management
Allegan County Board of Commissioners
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ALLEGAN COUNTY EMERGENCY OPERATIONS PLAN

RECORD OF CHANGES

A master copy of all parts of the Emergency Operations Plan (EOP) will be maintained electronically and in hard copy at the Allegan County Scott Corbin, Director of Allegan County EMD Division office (ACEMD). A backup copy will be maintained off-site in a secure location.

The master copy and its backup will be kept updated with all major revisions to any part of the plan. It is at the discretion of the Director of the ACEMD to distribute changes to the plan to those agencies on the distribution list when major revisions are made. Minor revisions such as correcting typographical errors do not need to be documented.

A Record of Changes page will be inserted in each document upon its first revision. The page is not included in page counts.

To create the page, copy the information from the final page of this document and paste it as a new first page into the document being revised, or paste it into a new document which will be an attachment to the document being revised.

Fill in the document title in the table at the top of the page, next to the words “Document Title”.

“Brief Description of Change” column:
Provide a brief description of the change.
Example: Changed responsibility from County Health Department to Department Human Services.

“Date of Change” column:
Enter the date the document was changed.
Example: 1/2008

“Page(s) Affected” column:
Enter the pages that were changed.
Example: 1, 3, 5-7, and 12

“Change Made By” column:
Enter the name of the person or organization who made the change. If applicable, the person’s title may also be listed here. The person or organization making the change can initial the hard copy or master copy kept in the ACEMD.

Example: Scott Corbin, Director of Allegan County Scott Corbin, Director of Allegan County EMD Division.

The above examples would produce a page similar to what is shown below. The document page may also have the appropriate header and footer.

**Record of Changes**

<table>
<thead>
<tr>
<th>Document Title</th>
<th>ESF #6 – Health and Medical</th>
</tr>
</thead>
</table>

<table>
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<tr>
<th><strong>Brief Description of Change</strong></th>
<th><strong>Date of Change</strong></th>
<th><strong>Page(s) Affected</strong></th>
<th><strong>Change Made By</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Changed responsibility from County Health Department to Department of Human Services</td>
<td>1/2008</td>
<td>1, 3, 5-7, and 12</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Brief Description of Change</td>
<td>Date of Change</td>
<td>Page(s) Affected</td>
<td>Change Made By</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------------</td>
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<tr>
<td>Complete EOP revision per Michigan Administrative Code (MAC), SLG 101, and the National Response Plan (NRP).</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Integration of the National Incident Management System (NIMS) per (HSPD)-5.</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Integrated the National Response Plan (NRP) into the local document.</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Revised the existing incident management/response organizational structure to facilitate the integration of the organizational structures outlined in the NIMS</td>
<td>3/2007</td>
<td>ESF #1</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Updated authorities listing to include all HSPD directives, state NIMS implementation and local NIMS adoption.</td>
<td>3/2007</td>
<td>BP-2</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Revised the resource management annex to reflect NIMS concepts and set guidelines for a comprehensive resource management program for Allegan County.</td>
<td>3/2007</td>
<td>ESF #7</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<td>Referenced procurement of resources by NIMS definitions in each ESF.</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Changed from Annex format to Emergency Support Function (ESF) format.</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<td>Updated Census information.</td>
<td>3/2007</td>
<td>BP</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Revised Glossary of Terms to include new terminology associated with the NIMS and found in the National Response Plan (NRP).</td>
<td>3/2007</td>
<td>BP-21</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Revised the Table of Contents to reflect all changes.</td>
<td>3/2007</td>
<td>iv-vi</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Developed individual ESF table of contents.</td>
<td>3/2007</td>
<td>N/A</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Included GIS Mapping with appropriate ESFs.</td>
<td>3/2007</td>
<td>N/A</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Removed all CPG references as SLG has replaced CPG. Updated Authorities list per NIMS.</td>
<td>3/2007</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Board of Commissioners Review and recommended grammatical changes</td>
<td>6/2008</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Brief Description of Change</td>
<td>Date of Change</td>
<td>Page(s) Affected</td>
<td>Change Made By</td>
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<td>-----------------------------------------------------</td>
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<tr>
<td>Promulgation Statement, new signature from Board Chairperson</td>
<td>12/2009</td>
<td>i</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>ESF/Annex signature page, new signatures from participating agencies.</td>
<td>12/2009</td>
<td>i</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Forward, new signature from Emergency Management Director</td>
<td>12/2009</td>
<td>ii</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Removed Annual Dates on Cover Pages</td>
<td>12/2009</td>
<td>All</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Added Americans With Disabilities Act; 1990</td>
<td>12/2009</td>
<td>BP-4</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Clarified the process for requesting assistance</td>
<td>12/2009</td>
<td>BP-8</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>IS training requirements for indirect, operations and supervisors per NIMS</td>
<td>12/2009</td>
<td>BP-11</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Remove should and replaced with shall and added District Coordinator</td>
<td>12/2009</td>
<td>BP-12</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Included EMAC</td>
<td>12/2009</td>
<td>BP-12</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Added requested resources through E-Team</td>
<td>12-2009</td>
<td>BP-17</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
</tr>
<tr>
<td>Removed USDHS and replaced with HSEEP</td>
<td>12/2009</td>
<td>BP-19</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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<tr>
<td>Changed Worker Decon locations from Allegan Fire District to Graafschap Fire Dept. under Exposure Control.</td>
<td>12/2009</td>
<td>RAD Annex III.LG.10</td>
<td>Scott Corbin, Director of Allegan County EMD</td>
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