

**FEMA's Technological
Hazards Division Assisted
State, Local, and Tribal
Governments in Preparing
to Respond to Radiological
and Chemical Incidents**





OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

September 15, 2023

MEMORANDUM FOR: The Honorable Deanne Criswell
Administrator
Federal Emergency Management Agency

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

Signed by

GLENN E SKLAR
Digitally signed by
GLENN E SKLAR
Date: 2023.09.14
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Glenn Sklar
Principal Deputy Inspector General

SUBJECT: *FEMA's Technological Hazards Division Assisted State, Local, and Tribal Governments in Preparing to Respond to Radiological and Chemical Incidents*

For your action is our final report, *FEMA's Technological Hazards Division Assisted State, Local, and Tribal Governments in Preparing to Respond to Radiological and Chemical Incidents*. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Kristen Bernard, Acting Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

FEMA's Technological Hazards Division Assisted State, Local, and Tribal Governments in Preparing to Respond to Radiological and Chemical Incidents

September 15, 2023

Why We Did This Audit

FEMA's THD is a component of FEMA's National Preparedness Directorate, Office of Resilience. THD administers REPP and CSEPP. The objective of the audit was to determine what actions FEMA's THD has taken during FYs 2018 through 2021 to assist SLT governments with preparing to respond to incidents related to radiological and chemical hazards.

What We Recommend

We made no recommendations in this report.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

Through the Radiological Emergency Preparedness Program (REPP) and the Chemical Stockpile Emergency Preparedness Program (CSEPP), Federal Emergency Management Agency's (FEMA) Technological Hazards Division (THD) has taken appropriate actions during fiscal years 2018 through 2021 to assist state, local, and tribal (SLT) governments with preparing to respond to radiological and chemical incidents. These actions are consistent with program requirements, related laws and regulations, and FEMA's responsibilities under two Memorandums of Understanding.

THD assisted SLT governments in preparing to respond to radiological incidents by updating REPP guidance and evaluation tools; and providing technical assistance, training, and program coordination, in conjunction with ongoing assessments and evaluations. These actions enabled THD to make periodic "reasonable assurance" determinations to the Nuclear Regulatory Commission (NRC) that SLT radiological emergency plans continue to be adequate and can be implemented in response to radiological incidents at commercial nuclear power plants.

During FYs 2018 through 2021, THD also assisted state and local governments in preparing to respond to chemical incidents. Specifically, THD implemented the CSEPP Strategic Plan; provided updated guidance; maintained CSEPP-related information systems; conducted benchmark capability reviews, annual exercise planning, and evaluations; and prepared after-action reports with findings and improvement plans. THD also took actions to support program closeout, tracked CSEPP Cooperative Agreement quarterly performance, and submitted annual reports to Congress, as required, on providing maximum protection for the environment, the public, and personnel who destroy chemical agents and munitions.

FEMA Response

FEMA did not submit management comments but provided technical comments, which we incorporated into this report as appropriate.



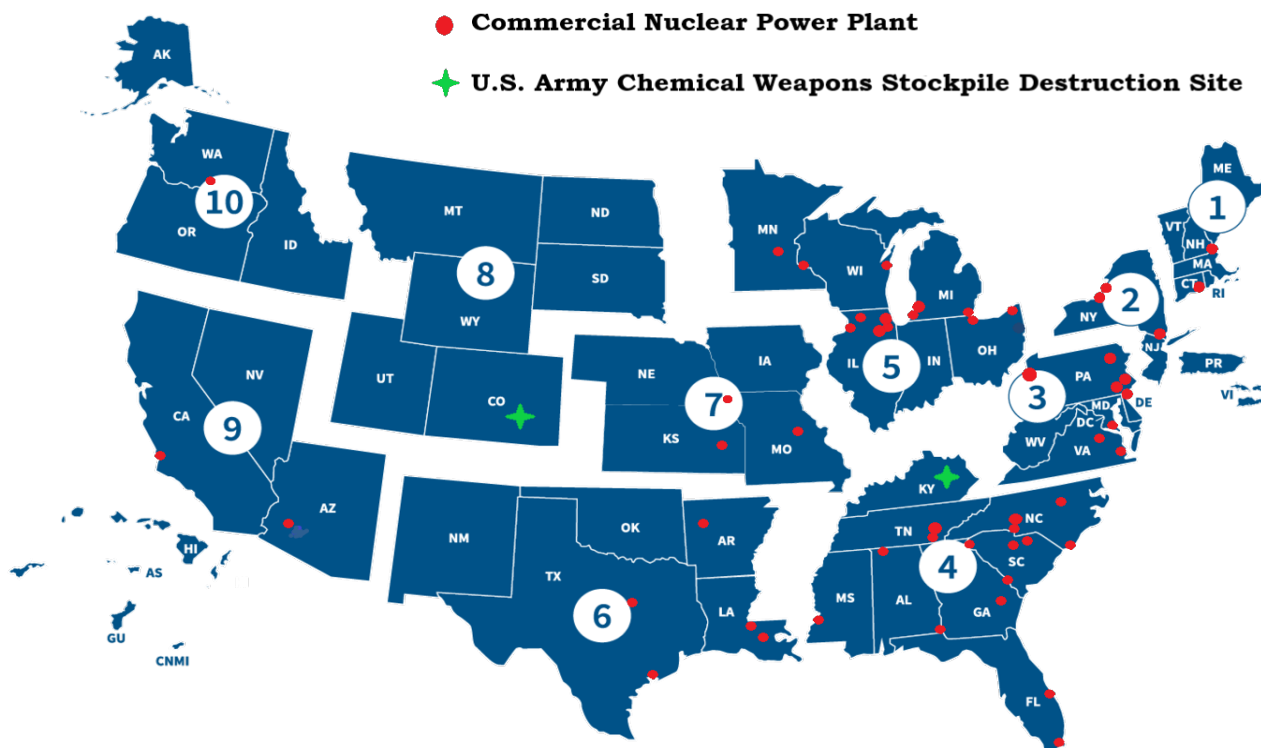
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Background

The Technological Hazards Division (THD) is a component of the Federal Emergency Management Agency’s (FEMA) National Preparedness Directorate, Office of Resilience. THD’s mission is to lead the national effort to build and sustain emergency response capabilities in local jurisdictions to address technological threats and hazards. These jurisdictions include more than 500 communities in 34 states surrounding commercial nuclear power plants (NPP) and two U.S. Army chemical weapons stockpile sites. THD administers two programs — the Radiological Emergency Preparedness Program (REPP) and the Chemical Stockpile Emergency Preparedness Program (CSEPP). Figure 1 illustrates the scope of the two programs across FEMA’s 10 regions and locations of 56 commercial NPPs and two Army chemical weapons stockpile destruction sites in the United States.

Figure 1: Map of Commercial Nuclear Power Plants and U.S. Army Chemical Weapons Destruction Sites



Source: Department of Homeland Security Office of Inspector General analysis of information provided by FEMA’s THD



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Department of Homeland Security

Radiological Emergency Preparedness Program

Following the March 1979 Three Mile Island nuclear power plant accident, President Carter directed the newly established FEMA to take the lead in state and local emergency planning and preparedness activities with respect to commercial NPPs. Accordingly, FEMA established REPP to review, evaluate, and approve offsite¹ emergency plans and preparedness in areas around commercial NPPs. The program is administered by FEMA's THD staff at FEMA Headquarters (HQ) and 9 of 10 FEMA regions. To approve offsite plans and preparedness, Federal regulations require FEMA to determine that such plans and preparedness adequately protect public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in a radiological emergency.² See Appendix A for a list of the 16 planning standards.

Figure 2: REPP Exercise



Source: FEMA

In FEMA's Memorandum of Understanding (MOU) with the Nuclear Regulatory Commission (NRC), FEMA is responsible for assessing offsite radiological emergency response plans and preparedness. FEMA is also required to make findings and determinations as to the adequacy and capability of implementing these plans and communicate the findings and determinations to the NRC.³ After providing its initial determination of reasonable assurance, FEMA continues to monitor state, local, and tribal (SLT) governments' emergency planning and preparedness. To ensure the maintenance of reasonable

¹ Offsite means beyond the boundaries of the owner-controlled area around a commercial NPP. REPP uses the term Offsite Response Organization (ORO) to refer to any SLT governmental organization; private or voluntary organization; or licensee ORO (formed when SLT governments choose not to participate in REPP) that is responsible for carrying out emergency response functions during a radiological emergency.

² In the communities surrounding commercial NPPs, 44 C.F.R. § 350.5 provides criteria for FEMA's review and approval of state, local, and tribal radiological emergency plans and preparedness. Approved plans and procedures "must be determined to adequately protect the public health and safety by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency." 44 C.F.R. § 350.5(b).

³ In connection with its licensing and regulatory responsibilities, the NRC reviews FEMA's findings and determinations in conjunction with the NRC's onsite findings for the purpose of making determinations on the overall state of emergency preparedness.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

assurance, FEMA conducts periodic evaluations and reviews, ongoing assessments, and reviews triggered by significant plan changes.⁴

Chemical Stockpile Emergency Preparedness Program

In 1985, Congress directed the Secretary of Defense to dispose of the United States' stockpile of chemical agents and munitions while providing "maximum protection for the environment, the general public, and personnel who are involved in the destruction of the lethal chemical agents and munitions."⁵ An interagency MOU between FEMA and the Department of the Army, first signed in 1988, designates FEMA responsible for managing and directing off-post⁶ aspects of CSEPP at eight Army installations in the continental United States with chemical agent stockpiles. Two of the eight destruction facilities, one in Colorado and the other in Kentucky, currently remain in operation. Destruction of Army chemical weapons stockpiles is scheduled to be completed by the end of 2023.

CSEPP's objective is to strengthen the abilities of communities surrounding Army chemical weapons stockpile sites to prepare for, respond to, and recover from a chemical emergency. THD personnel assigned to FEMA HQ and regions 4 and 8 administer CSEPP. Communities surrounding the Army's two active chemical weapons stockpile sites are funded through site specific CSEPP grants

Figure 3: CSEPP Exercise



Source: FEMA

⁴ After FEMA's initial determination of reasonable assurance, FEMA must receive any significant change to previously approved plans/procedures for review and approval.

⁵ Section 1412(c)(1)(A) of the *Department of Defense Authorization Act, 1986*, Public Law 99-145 (Nov. 8, 1985), directs that, in carrying out the destruction of the United States' stockpile of lethal chemical agents and munitions, the Secretary of Defense shall provide "maximum protection for the environment, the general public, and the personnel who are involved in the destruction of the lethal chemical agents and munitions." See also 50 U.S.C. § 1521(d)(1)(A).

⁶ The Department of the Army retains responsibility for on-post aspects of the program.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

and administered through cooperative agreements.⁷ CSEPP is a sunset program authorized to provide assistance to communities until either completion of all grants and cooperative agreements between FEMA and the State and local governments concerned, or 180 days after the destruction of all lethal chemical agents and munitions, whichever comes first.

Results of Audit

Through REPP and CSEPP, FEMA's THD has taken appropriate actions during fiscal years 2018 through 2021 to assist SLT governments in preparing to respond to radiological and chemical incidents. These actions are consistent with program requirements, related laws and regulations, and FEMA's responsibilities under two MOUs with NRC and the Army.

THD's REPP Actions to Assist State, Local, and Tribal Governments with Radiological Emergency Preparedness

The NRC Authorization Acts of 1980 and 1982-1983 directed the NRC to establish emergency preparedness as a criterion for licensing commercial nuclear power plants. Part 50 of Title 10 of the Code of Federal Regulations (C.F.R.) requires the NRC to base the issuance of commercial NPP licenses, in part, on findings and determinations made by FEMA as to whether there is reasonable assurance⁸ state and local governments' radiological emergency plans are adequate and can be implemented.⁹

Part 350 of Title 44 of the C.F.R. establishes FEMA's state and local emergency plans and preparedness review and approval policy and procedures for the offsite effects of a radiological emergency that may occur at a commercial NPP. The regulations include criteria and processes for FEMA's review and approval of state and local radiological emergency plans and preparedness; the approach for assisting governments to develop state and local plans; required exercises; and situations that may result in FEMA's withdrawal of approval. Section 351.20 specifies FEMA's radiological emergency planning and preparedness interagency assignments. These assignments include issuing guidance and criteria, reviewing and approving state radiological emergency plans and

⁷ FEMA distributed more than \$1.4 billion in grant funds it received from the Army to CSEPP communities since 1989.

⁸ Reasonable assurance is defined as a "determination that NRC licensee or applicant onsite plans and state, local, and tribal government and utility offsite plans and preparedness are adequate to protect public health and safety in the emergency planning areas of a commercial NPP." *Program Manual, Radiological Emergency Preparedness, FEMA P-1028*, December 2019, page 6.

⁹ 10 C.F.R. § 50.47(a)(2).



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

preparedness, as well as providing training and public education and information to meet state and local needs.

The MOU between FEMA and the NRC establishes a framework of cooperation between the agencies regarding radiological emergency response planning and preparedness consistent with applicable legal requirements. Pursuant to the terms of the MOU, THD “ensures that [SLT] governments can adequately protect the health and safety of the public living in the vicinity of” a commercial NPP in the event of a radiological incident at an NPP and “informs and educates the public about radiological emergency preparedness.” In addition, THD “supports and provides guidance to [SLT] governments’ emergency planning and preparedness activities that take place ‘offsite.’”

To assist SLT governments with preparing to respond to incidents related to radiological hazards, THD updated its REPP guidance and evaluation tools to aid with transitioning to revised radiological emergency planning standards. Specifically, in December 2019, FEMA issued an updated *Radiological Emergency Preparedness Program Manual (RPM)*¹⁰ to support the implementation of revised NUREG 0654/FEMA-REP 1 standards¹¹ for evaluating radiological emergency plans (see Appendix A for a list of the program’s planning standards). THD also developed a crosswalk to help REPP stakeholders convert radiological emergency plans to the updated standards. THD also incorporated eight radiological emergency preparedness assessment tools into the 2019 revision of the RPM. In addition, THD provided templates, checklists, and job aids to support REPP in FEMA’s Preparedness Tool Kit.¹²

THD also provided technical assistance, training, and interagency program coordination to prepare SLT governments to respond to incidents related to radiological hazards. The technical assistance THD provided, in the form of Site Assistance Visits, included helping develop, review, and implement plans; participating in and observing non-evaluated exercises and drills; and verifying information within Annual Letters of Certification (ALC)¹³ and SLT emergency

¹⁰ *Program Manual, Radiological Emergency Preparedness, FEMA P-1028*, December 2019.

¹¹ NUREG-0654/FEMA-REP-1, “*Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*,” Revision 2, December 2019, is a joint NRC NUREG-series publication and FEMA guidance document that reflects changes to both NRC and FEMA regulations, guidance, policies, and doctrine, as well as advances in technology and best practices that have occurred since the document was originally issued in November 1980.

¹² FEMA’s Preparedness Toolkit is an online collaborative environment for all levels of government and private and nonprofit sectors to share information, files and data, and execute preparedness activities.

¹³ Each state participating in REPP submits an ALC and supporting documentation to the appropriate FEMA Regional Administrator. An ALC includes information such as plan



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

preparedness plans. Between FYs 2018 and 2021, THD scheduled more than 240 REPP-related training courses for SLT governments on topics such as radiological accident assessment, radiological exercise evaluation, and radiological emergency response operations. THD also converted in-person classes to virtual trainings to conform with COVID-19 protocols. In addition, THD facilitated interagency coordination through its membership in radiological committees, which include, but are not limited to, representatives from FEMA and other Federal agencies such as the NRC, Environmental Protection Agency, and Department of Energy. For example, THD co-chaired the Federal Radiological Preparedness Coordinating Committee (FRPCC),¹⁴ which assisted FEMA with providing policy direction for the program of Federal assistance to SLT governments in their radiological planning and preparedness activities, consistent with requirements set forth in 44 C.F.R. § 351.11(a). Further, Regional Assistance Committees (RACs)¹⁵ provided support to FEMA regions, such as reviewing potential findings prior to THD issuing exercise after-action reports, consistent with requirements set forth in 44 C.F.R. § 351.11(b).

THD took these actions, in conjunction with conducting ongoing plan reviews, assessing states' ALC submissions, evaluating exercises and drills, issuing findings and recommendations, and tracking and monitoring corrective actions. Between 2018 and 2021, THD evaluated 105 biennial exercises,¹⁶ which resulted in 94 reported findings (4 Level 1 Findings, 47 Level 2 Findings, and 43 Plan Issues).¹⁷ In addition, THD tracked and monitored SLT

updates, training and drills conducted during the year, and updates made to emergency facilities and equipment.

¹⁴ The FRPCC consists of representatives from FEMA, which chairs the Committee, NRC, Environmental Protection Agency, Department of Health and Human Services, Department of Energy, Department of Transportation, Department of Defense, U.S. Department of Agriculture, Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. 44 C.F.R. § 351.10(a).

¹⁵ RACs, one in each of 10 standard Federal regions, consist of a FEMA Regional Representative who chairs the Committee and representatives from the NRC, Environmental Protection Agency, Department of Health and Human Services, Department of Energy, Department of Transportation, U.S. Department of Agriculture, Department of Commerce and other Federal departments and agencies such as the Department of Defense, as appropriate. 44 C.F.R. § 351.10(b).

¹⁶ 44 C.F.R. § 350.9(c)(1) requires each state with a commercial nuclear power site within its boundaries or any state within the 10-mile plume exposure pathway Emergency Planning Zone of such a site to fully participate in an exercise jointly with the nuclear power plant licensee and appropriate local governments at least every 2 years.

¹⁷ A Level 1 Finding is an observed or identified inadequacy of organizational performance during an assessment activity that could cause a determination that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a NPP. A Level 2 Finding is an observed or identified



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

governments' corrective actions related to reported findings.¹⁸ THD's actions were consistent with program requirements, related laws and regulations, and FEMA's responsibilities under the MOU with the NRC. These actions enabled THD to make periodic "reasonable assurance" determinations to the NRC that SLT governments' offsite radiological emergency plans continue to be adequate and can be implemented in response to radiological incidents at commercial nuclear power plants.¹⁹

THD's CSEPP Actions to Assist State and Local Governments with Chemical Stockpile Emergency Preparedness

Title 50 of the U.S. Code, Section 1521 directs the Secretary of Defense to dispose of the United States' stockpile of chemical agents and munitions. It also directs FEMA to carry out a program to help state and local governments develop capabilities to respond to emergencies involving risks to public health or safety in their jurisdictions resulting from the storage or destruction of lethal chemical agents and munitions. In addition, Public Law 104-201²⁰ requires CSEPP to establish site-specific Integrated Product and Process Teams (IPTs) as management tools.

The MOU between FEMA and the Army outlines several FEMA responsibilities related to assisting state and local governments through CSEPP. FEMA's responsibilities include:

- working with state and local governments to develop off-post emergency preparedness for responding to chemical incidents at chemical stockpile storage installations;
- administering appropriated funds to state and local governments to support off-post emergency response preparedness for the chemical stockpiles;
- taking the lead to support state and local governments with the development of offsite emergency preparedness plans, including upgrading community response capabilities and conducting necessary training;

inadequacy of organizational performance during an assessment activity that is not considered, by itself, to adversely impact public health and safety. A Plan Issue is an observed or identified inadequacy in the ORO's emergency plan/implementing procedures, rather than that of the ORO's performance.

¹⁸ THD tracks program information using spreadsheets, tracking tools, and dashboards.

¹⁹ The approved plans and procedures must be determined to adequately protect health and safety by providing "reasonable assurance" that appropriate protective measures can be taken offsite in the event of a radiological emergency.

²⁰ Public Law 104-201, September 23, 1996, *National Defense Authorization Act for Fiscal Year 1997*, Section 1076, *Chemical Stockpile Emergency Preparedness Program*.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

- preparing, developing, delivering, and evaluating the effectiveness of training to state and local governments for planning, mitigation, and emergency response as they apply to the chemical stockpiles;
- providing technical assistance to state and local governments in the development of site-specific emergency preparedness programs;
- working closely with states to develop policies and procedures to assist states in developing readiness at each site; and
- providing emergency management assistance, liaison, and functional expertise to the Army and state and local governments to integrate on-post and off-post emergency response.

CSEPP uses 12 National Benchmarks to measure progress toward achieving program goals identified in the *Chemical Stockpile Emergency Preparedness Program, Fiscal Years 2019-2024 Strategic Plan* (CSEPP Strategic Plan) (see Appendix B for a list of the program’s benchmarks). CSEPP also assesses program performance through Community Readiness Profiles, exercises, equipment tests, training opportunities, procurement actions, and other factors, such as completion of engineering or construction projects.

Through CSEPP, THD has taken several actions to assist state and local governments with preparing to respond to incidents related to chemical hazards, and these actions are consistent with CSEPP-related laws and regulations, and FEMA’s MOU responsibilities. FEMA and the Army issued the CSEPP Strategic Plan²¹ to maintain and sustain CSEPP enhanced preparedness while preparing for successful program closeout and the *Chemical Stockpile Emergency Preparedness Program, Program Guidebook* (CSEPP Program Guidebook)²² to provide updated guidance and best practices for implementing CSEPP. In addition, THD issued the *Exercise Implementation Guidance, Chemical Stockpile Emergency Preparedness Program, December 2019, Change 1*²³ to complement the CSEPP Program Guidebook and the *Guide to Implementing the Integrated Public Alert and Warning System (IPAWS), Version 2*²⁴ to address the need for better IPAWS planning, training, and exercising.

²¹ *Chemical Stockpile Emergency Preparedness Program, Fiscal Years 2019–2024 Strategic Plan*, July 2019.

²² *Chemical Stockpile Emergency Preparedness Program, Program Guidebook*, March 2019.

²³ *Exercise Implementation Guidance, Chemical Stockpile Emergency Preparedness Program, December 2019, Change 1*, February 2021.

²⁴ *Guide to Implementing the Integrated Public Alert and Warning System (IPAWS), Version 2*, February 2019.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

THD also issued the CSEPP Cooperative Agreement (CA) Life Cycle Standard Operating Procedures to guide the implementation of CSEPP CA phases;²⁵ and the CSEPP Headquarters Closeout Plan to enable more effective transition by Colorado and Kentucky and eventual program closeout.²⁶ THD maintained CSEPP-related information systems that include the CSEPP Portal²⁷ for training; information sharing and collaboration with CSEPP partners; and the CSEPP WebCA grant management system for budget preparation, review, submittal, approval, quarterly reporting, reallocations, amendments, and closeout.

THD implemented CSEPP processes through a Program Management Team (PMT)²⁸ and IPTs, as mandated.²⁹ The Blue Grass and Pueblo Community IPTs³⁰ consist of representatives from FEMA Headquarters and regional offices, the Army, states, counties, and other organizations within the community. Examples of THD-related PMT and IPT efforts include notifying state and local partners of a planned national test of the IPAWS system and supporting the CSEPP WebCA Work Group with discussions on CSEPP grants and WebCA functions. In addition, through the IPTs, THD helped develop a training needs survey to guide the completion of the 3-year training plan and identify emerging training needs as program closeout approaches.

THD and other CSEPP stakeholders also formed functional IPTs and work groups, such as the Automation and Public Affairs IPTs, the Exercise and Medical Work Group, Sheltering Working Group, and Closeout Work Group. These IPTs and work groups performed specific functions, such as reviewing information system requirements, public communications, exercise planning, coordinating with relief groups to review sheltering plans, and coordinating program closeout.

THD also assisted state and local governments with preparing to respond to incidents related to chemical hazards through other actions. For instance, THD developed CSEPP Exercise Plans in accordance with the CSEPP Exercise

²⁵ *Chemical Stockpile Emergency Preparedness Program Cooperative Agreement Life Cycle Standard Operating Procedures*, January 2020.

²⁶ *FEMA Headquarters CSEPP Closeout Plan*, January 2022.

²⁷ According to the FEMA Headquarters CSEPP Closeout Plan, the CSEPP Portal transitioned to the cloud in 2021 and will act as a repository of historical data and critical documentation. It will be supported and maintained by a CSEPP contractor until CSEPP closeout.

²⁸ The CSEPP Program Management Team was created in 2011 as part of the transition to a two-state program.

²⁹ IPTs, mandated under Public Law 104-201, enable federal, state, tribal, and local CSEPP personnel to collaboratively address integration and compatibility of on and off-post emergency preparedness and response.

³⁰ The two current chemical stockpile sites are located at the Blue Grass Army Depot in Kentucky and the Pueblo Chemical Depot in Colorado.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Implementation Guidance. THD also conducted benchmark capability reviews and reported its results in exercise after-action reports to SLT governments using a rating system (i.e., “Capable,” “Partially Capable,” and “Not Capable”). In addition, THD conducted annual exercises to assess CSEPP community preparedness, and prepared after-action reports with identified findings and improvement plans to document exercise results, recommend improvements, track performance, and address findings noted in prior exercises.

THD tracked and reviewed CA quarterly performance reports submitted by states. Quarterly reports included a narrative of how expenditures for each benchmark contributed to meeting and/or maintaining benchmark capabilities, as well as any significant accomplishment for major projects for each of the 12 CSEPP benchmarks. Finally, THD, in conjunction with the Army, submitted annual reports to Congress, as required, on providing maximum protection for the environment, the public, and the personnel who are involved in the destruction of the lethal chemical agents and munitions.

Management Comments and OIG Analysis

FEMA did not submit management comments. However, FEMA provided technical comments on May 16, 2023, and we incorporated the comments into this report where appropriate.

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002 (Public Law 107-296)* by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine what actions FEMA’s THD has taken to assist SLT governments with preparing to respond to incidents related to radiological and chemical hazards. The work conducted to answer the objective was limited to identifying the activities of FEMA’s THD to support SLT governments through REPP and CSEPP. We did not evaluate the readiness of any SLT government or community supported by FEMA through these two programs. To answer this objective, we reviewed Federal criteria from 44 C.F.R. 350-354 and 50 U.S.C. § 1521, as well as MOUs signed by FEMA, the NRC, and the Army. We reviewed THD’s internal control processes, fraud risk processes, policies, procedures, and guidance related to both the REPP and CSEPP programs. We surveyed SLT government officials to collect their feedback on the REPP. Additionally, we reviewed congressional testimony and prior audit reports related to our audit objective, including reports from DHS OIG, the U.S. Government Accountability Office (GAO), and the NRC OIG.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

In planning and performing our audit, we identified the internal control components and underlying internal control principles that were significant to the audit objective. However, because we limited our review to these internal control components and underlying principles, we may not have disclosed all internal control deficiencies that may have existed at the time of our audit. We conducted interviews and held virtual meetings with personnel from THD HQ and regional offices to understand their roles and responsibilities over REPP and CSEPP to answer our audit objective and substantiate claims made throughout the audit.

To gain an understanding of the regional processes used by THD's REPP personnel to assess community radiological emergency response plans, we randomly selected nine commercial NPPs. Our selection was based on one NPP from each of the nine FEMA regions. We requested and reviewed documentation from FYs 2018 through 2021 for each of the nine FEMA regions administering REPP, including ALCs and associated supporting documents, public information reviews and public notices, and exercise after-action reports. We analyzed the information received from FEMA and conducted limited tests to determine whether FEMA followed documented processes for assessing adequacy of state, local, and tribal radiological emergency response plans. We also reviewed computer-generated data from THD's REPP Exercise After-Action Report and Training Dashboards and found them to be sufficiently reliable and complete for purposes of our audit. In addition, we developed questionnaires for staff from each of the nine FEMA regional offices administering REPP.

We did not rely on computer-generated data to make conclusions regarding CSEPP's actions to assist state and local governments with preparing for chemical emergencies. We reviewed CSEPP exercise after-action reports, quarterly performance reports, and reports to Congress from FYs 2018 through 2021 for the two remaining chemical weapons stockpile destruction facilities. We also conducted limited tests of CSEPP's processes for assessing SLT government off-post chemical stockpile emergency preparedness.

We conducted this performance audit between March 2022 and March 2023 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



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Department of Homeland Security

DHS OIG's Access to DHS Information

During the audit, FEMA provided timely responses to our requests for information and did not deny or delay access to the information we requested.

The Office of Audits major contributors to this report are Brooke Bebow, Director; David Fox, Audit Manager; Michael McGee, Auditor-in-Charge; Tai Cheung, Auditor; Fernando Martinez, Auditor; Kevin Dolloson, Communications Analysts; and Lori Smith, Independent Report Referencer.



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Appendix A
REPP Planning Standards













<p>Planning Standard A – Assignment of Responsibility</p> <p>Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.</p>	<p>Planning Standard I – Accident Assessment</p> <p>Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.</p>
<p>Planning Standard B – Emergency Response Organization</p> <p>On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.</p>	<p>Planning Standard J – Protective Response</p> <p>A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.</p>
<p>Planning Standard C – Emergency Response Support and Resources</p> <p>Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee’s EOF have been made, and other organizations capable of augmenting the planned response have been identified.</p>	<p>Planning Standard K – Radiological Exposure Control</p> <p>Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.</p>
<p>Planning Standard D – Emergency Classification System</p> <p>A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.</p>	<p>Planning Standard L – Medical and Public Health Support</p> <p>Arrangements are made for medical services for contaminated injured individuals.</p>
<p>Planning Standard E – Notification Methods and Procedures</p> <p>Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.</p>	<p>Planning Standard M – Recovery, Reentry, and Post-Accident Operations</p> <p>General plans for recovery and reentry are developed.</p>
<p>Planning Standard F – Emergency Communications</p> <p>Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.</p>	<p>Planning Standard N – Exercises and Drills</p> <p>Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.</p>
<p>Planning Standard G – Public Education and Information</p> <p>Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.</p>	<p>Planning Standard O – Radiological Emergency Response Training</p> <p>Radiological emergency response training is provided to those who may be called on to assist in an emergency.</p>
<p>Planning Standard H – Emergency Facilities and Equipment</p> <p>Adequate emergency facilities and equipment to support the emergency response are provided and maintained.</p>	<p>Planning Standard P – Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans</p> <p>Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.</p>

Source: FEMA REP Program Manual, 2019 Revision



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Appendix B
CSEPP National Benchmarks

 <p>Administrative Support Administrative support for each CSEPP installation, state, and county necessary to support their CSEPP preparedness activities.</p>	<p>CSEPP Exercises An exercise program that effectively tests integrated response capabilities and preparedness.</p> 
 <p>Alert and Notification Functioning alert and notification system extending across the installation and appropriate off-post jurisdictions to communicate protective actions and other critical response information to the public.</p>	<p>Medical Preparedness A medical program to support on- and off-post medical preparedness among first responder and receiver organizations for a chemical weapons accident or incident.</p> 
 <p>Automation Functioning automation system for rapid exchange of chemical hazard modeling and protective action analysis between the CSEPP installation, state and counties.</p>	<p>Qualified Personnel Specialized personnel, such as CSEPP manager, public information officer, planner, and information technology specialist, to support CSEPP activities at CSEPP installations, states, and counties.</p> 
 <p>Communication Systems Functioning communications links between the CSEPP installation, state and county EOCs, and the JIC to support coordinated implementation of response plans.</p>	<p>Protective Action Strategies Protective action strategy for each jurisdiction that is based on the threat from the stockpile, consistent with response plans, and conforms to established CSEPP guidance.</p> 
 <p>Coordinated Plans Coordinated plans for response to hazards from the stockpile for each CSEPP installation, state, and county.</p>	<p>Public Outreach/Education A program for coordinated emergency public information and education, including a public outreach/education program to enhance CSEPP awareness and familiarity with the protective action strategy.</p> 
 <p>Emergency Operations Centers Functioning EOCs at each CSEPP installation, state, and county to support coordinated implementation of response plans.</p>	<p>Training Programs Training programs, consistent with CSEPP guidance, state and local training plans (for off-post jurisdiction personnel) and Army certification requirements (for installation personnel) that maintain proficiency of emergency services providers/responders and CSEPP staff.</p> 

Source: CSEPP Guidebook, 2019 Revision



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Appendix C
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