

### **Sub-Element 2.c—Protective Action Decisions for the Protection of Special Populations**

<b>What the Policy Says</b>	<p><b>Intent</b>  NUREG-0654 provides that OROs should have the capability to determine protective action recommendations, including evacuation, sheltering and use of potassium iodide (KI), if applicable, for special population groups (for example, hospitals, nursing homes, correctional facilities, schools, licensed day care centers, mobility impaired individuals, and transportation dependent individuals). Focus is on those special population groups that are (or potentially will be) affected by a radiological release from a nuclear power plant.</p> <p><b>Criterion 2.c.1:</b> Protective action decisions are made, as appropriate, for special population groups. (NUREG-0654, J.9, J.10.d, e).</p> <p><b>Minimum Frequency</b>  Criterion 2.c.1 is to be evaluated every exercise.</p> <p><b>Extent of Play</b>  Usually, it is appropriate to implement evacuation in areas where doses are projected to exceed the lower end of the range of PAGs, except for situations where there is a high-risk environment or where high-risk groups (for example, the immobile or infirm) are involved. In these cases, examples of factors that should be considered are: weather conditions, shelter availability, availability of transportation assets, risk of evacuation versus risk from the avoided dose, and precautionary school evacuations. In situations where an institutionalized population cannot be evacuated, the administration of KI should be considered by the OROs.</p> <p>Applicable OROs should demonstrate the capability to alert and notify all public school systems/districts of emergency conditions that are expected to or may necessitate protective actions for students. Contacts with public school systems/districts must be actual.</p> <p>In accordance with plans and/or procedures, OROs and/or officials of public school systems/districts should demonstrate the capability to make prompt decisions on protective actions for students. Officials should demonstrate that the decision making process for protective actions considers (that is, either accepts automatically or gives heavy weight to) protective action recommendations made by ORO personnel, the ECL at which these recommendations are received, preplanned strategies for protective actions for that ECL, and the location of students at the time (for example, whether the students are still at home, en route to the school, or at the school)."</p> <p>All decision-making activities associated with protective actions, including consideration of available resources, for special population groups must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the Extent of Play agreement.</p>
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<p><b>Preparing to Evaluate This Criterion</b></p>	<p>Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:</p> <ul style="list-style-type: none"> <li>• Are the special populations considered part of the general population or are protective action decisions made for any special populations only?</li> <li>• Who (identify by title and organization) will make the protective action decision for special populations?</li> <li>• What factors will be considered when making protective action decisions for special populations?</li> <li>• What types of special needs facilities are within the affected area for your evaluation location?</li> <li>• What types of special populations are in the affected area of the EPZ for your evaluation location?</li> <li>• Review scenario material; identify what areas will be affected by the plume?</li> <li>• What types of protective actions do the plans/procedures indicate could be decided for special populations?</li> </ul>
<p><b>During the Exercise</b></p>	<p>During the exercise, in addition to evaluating activities related to the items listed above, be sure to:</p> <ul style="list-style-type: none"> <li>• Note what PADs are made for special populations, including schools, e.g.: <ul style="list-style-type: none"> <li>➤ Evacuation,</li> <li>➤ Shelter-in-Place,</li> <li>➤ Administration of KI,</li> <li>➤ Precautionary Evacuations.</li> </ul> </li> <li>• Note the time of the protective action decision (or precautionary protective action decision), its implementation, and who made it.</li> <li>• If there was a delay in making the decision, document what the delay was.</li> <li>• Note the organization/title of the individual who makes the PADs for special populations.</li> <li>• Note whether decisions for school children were based on: <ul style="list-style-type: none"> <li>➤ ORO recommendation,</li> <li>➤ ECL at time of notification,</li> <li>➤ School plans,</li> <li>➤ Location of students, and/or</li> <li>➤ Time of day.</li> </ul> </li> <li>• Note the basis of the PADs for other special populations, e.g.: <ul style="list-style-type: none"> <li>➤ Emergency Classification Level (ECL)</li> <li>➤ Weather conditions,</li> <li>➤ Shelter availability,</li> <li>➤ Availability of transportation assets</li> <li>➤ Availability of alternate locations for special populations,</li> <li>➤ Risk of evacuation vs. risk from avoided dose.</li> </ul> </li> </ul>