



**EXERCISE TOPOFF 2000
AND
NATIONAL CAPITAL REGION
(NCR)**

AFTER-ACTION REPORT

The National Response Team

FINAL REPORT

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Table of Contents

Exercise TOPOFF 2000 After-Action Report

- I. Background
- II. Environmental Protection Agency Objectives for Exercise TOPOFF and NCR 2000
- III. U.S. Coast Guard Objectives for Exercise TOPOFF and NCR 2000
- IV. NRT Exercise Observation Report Submitted to the Department of Justice
- V. Overarching Observations
- VI. Observations Regarding Achievement of TOPOFF Exercise Objectives
 - A. Activate the NRS and the NCP
 - B. Evaluate Ability to Provide and Serve as FOSCs
 - C. Examine the Federal Notification Mechanisms
 - D. Validate Deployment of Emergency Response Assets
 - E. Evaluate Ability to Support the FBI and FEMA
 - F. Exercise Interagency Coordination Using an ICS/UC
 - G. Other Observations

National Capital Region (NCR) 2000 After-Action Report

- I. Background
- II. Overarching Observations
- III. Observations Regarding Achievement of NCR 2000 Exercise Objectives
 - A. Activate the NRS and the NCP
 - B. Evaluate Ability to Provide and Serve as FOSCs
 - C. Examine the Federal Notification Mechanisms
 - D. Validate Deployment of Emergency Response Assets
 - E. Evaluate Ability to Support the FBI
 - F. Evaluate Ability to Support FEMA
 - G. Exercise Interagency Coordination Using an ICS/UC
 - H. Other Observations

Appendices

- A. EPA Lessons Learned Submitted to DOJ
- B. USCG Lessons Learned Submitted to DOJ

Exercise TOPOFF 2000 After-Action Report

I. Background

Exercise TOPOFF (Top Officials) 2000 was a Congressionally mandated, “no-notice” national exercise held in May 2000. It was designed to assess the nation’s crisis and consequence management capability by exercising the plans, policies, procedures, systems, and facilities through local, state, and Federal responses to geographically-dispersed terrorist threats and acts. The exercise was co-sponsored by the Department of Justice (DOJ) and the Federal Emergency Management Agency (FEMA), which were designated as the lead agencies for the exercise by the Senate Appropriations Committee in Senate Report 105-235. The exercise was the largest peacetime terrorism exercise ever sponsored by DOJ or FEMA.

Exercise TOPOFF was a multi-component, multi-site exercise incorporating command post exercises, full-scale training exercises, tactical exercises, and several large-scale “subexercises.” The Exercise incorporated design input from crisis and consequence managers across the nation. An important aim of the Exercise was to examine the interfaces and relationships between the participating agencies and their top officials to identify any seams, gaps, and redundancy in responsibilities that affect decision-making and subsequent actions directed to resolve the scope of consequences resulting from the simulated attacks.

The Exercise scenario involved simultaneous incidents occurring in both Region I (Portsmouth, New Hampshire) and Region VIII (Denver, Colorado). STARTEX for Exercise TOPOFF occurred on Wednesday, May 17, 2000, with the terrorist-motivated release of a biological agent in the Denver metropolitan area. However, because the released agent, later identified as pneumonic plague, had a two to three day incubation period, active play did not begin until Saturday, May 20, 2000. As an influx of patients exhibiting flu-like symptoms began to rapidly overwhelm the Denver area hospitals by early Saturday morning, a van exploded at the Port Authority dock in Portsmouth, New Hampshire, causing numerous injuries and fatalities. The chemical agent released in the van explosion was subsequently determined to be mustard gas. Active play continued at both venues through the weekend and the following week, ending on Wednesday, May 24, 2000. An interagency hotwash followed on Thursday, May 25th.

Planning for Exercise TOPOFF, as well as the National Capital Region 2000 Exercise (see the NCR 2000 Exercise After-Action Report on page 13), involved several “trusted agents” from EPA and USCG, as well as regional offices in RRTs I, III, and VIII. Through this process, EPA and USCG also cooperated closely with other National Response System (NRS) departments and agencies, including the Department of Health and Human Services (DHHS) and FEMA.

Although individual NRT member agencies that participated in Exercise TOPOFF were invited to submit observations directly to DOJ, the NRT as a whole felt it was important to document observations and lessons learned in this report. Given the scenario, the NRS had an important role during Exercise TOPOFF, particularly at the Portsmouth venue, which involved a hazardous materials release in a coastal area. As part of its inherent function, the NRT feels that it is important to recognize areas for improvement in an attempt to avoid them in the future. As a result, this report is not intended to override individual agency submissions, but rather to supplement them and provide a forum for identifying and addressing NRS-related observations.

The observations identified in this report were provided during several debriefings that followed the Exercise, including the May 25th interagency hotwash, the May 31st EPA Counter-Terrorism Program

Coordination Team (CTPCT) meeting, the June 8th NRT meeting, and the June 14-15th TOPOFF 2000 and NCR After-Action Review Conference. In addition, observations were also compiled from the Exercise controllers and evaluators located at the various venues. NRT members and Regional Response Team (RRT) Co-Chairs from the affected regions were also invited to provide observations for inclusion in this report.

This summary is not intended to address all of the observations identified, but rather to synthesize the most significant lessons learned. Although artificialities introduced by the Exercise may have created issues or confusion where none would normally exist during an actual response, these areas for improvement are discussed nonetheless, because they may have important implication for the design of future drills, exercises, or procedures.

Outlined below are the Exercise TOPOFF and NCR 2000 objectives for EPA and the USCG.

II. EPA Objectives for Exercise TOPOFF and NCR 2000

The Environmental Protection Agency's (EPA's) overall goal is to protect public health, welfare and the environment. The following objectives for Exercise TOPOFF and NCR 2000 support this goal.

1. Activate National Response System and National Contingency Plan (NCP, 40 CFR Part 300).
 - Activate the National Response Team (NRT).
 - Activate at least one Regional Response Team (RRT).
 - Evaluate EPA's ability to support the Federal On-Scene Coordinator (FOSC).
 - Evaluate EPA's ability as the FOSC.
 - Evaluate EPA's ability to coordinate with the Incident Commander.
 - Evaluate EPA's ability to integrate into and coordinate a Unified Command structure.
 - Ensure that exercise participants and observers have the opportunity to learn about the existing response authorities and capabilities under the NCP, 40 CFR Part 300.
 - Evaluate transition from National Contingency Plan to FRP Emergency Support Function #10 and the coordination of ESF #10 transitions between coastal and inland areas.
2. Examine the Federal notification mechanisms for both Crisis and Consequence Management operations.
 - Ensure that the National Response Center (NRC), the existing Federal notification mechanism for hazardous substances, is effectively utilized.
3. Validate EPA's deployment of emergency response assets to incident scene(s).
 - Evaluate Regional Office(s)' ability to respond to credible WMD events.
 - Evaluate ability of EPA's national response assets to deploy to and/or support regional response operations.
4. Exercise and evaluate EPA's ability to support the FBI as Crisis Management LFA.
 - Evaluate ability to deploy staff to the SIOC, EST, JOC, and JIC (as appropriate), and perform Agency's mission.
 - Evaluate ability to Liaison with On Scene Commander, and provide required assistance.
5. Exercise and evaluate EPA's ability to support FEMA as Consequence Management LFA.
 - Evaluate ability to deploy staff to EST, ROC, and DFO (as appropriate), and perform agency's mission.

- Evaluate EPA's ability to protect public health, welfare, and the environment during terrorist incidents (under the NCP and the FRP).
6. Assess interagency coordination and other participating agencies understanding of the role of the NRS in a WMD incident.
 7. Assess and report on public health and environmental consequences of WMD incidents.

III. Coast Guard Objectives for Exercise TOPOFF and NCR 2000

1. Demonstrate appropriate leadership, U.S. Coast Guard (USCG) capabilities and partnerships with other agencies in WMD response in accordance with the NCP and the FRP (ESF-1 and ESF-10).
2. Exercise USCG statutory authorities using Captain of the Port (COTP) and law enforcement forces.
3. Support lead Federal agency, senior government officials, other agencies, and the general public.
4. Exercise interagency coordination using an Incident Command System/Unified Command (ICS/UC).
5. Exercise C3 from the Incident Commander to Commandant (COMDT) through the chain of command and COMDT to the National Security Council (NSC) in a terrorism WMD situation.
6. Establish working relationships among the CG Atlantic Strike Team and the U.S. Marine Corps Chemical Biological Incident Response Force (CBIRF) under both the NCP and FRP.
7. Establish working relationships with the FBI under the NCP and the DOD Joint Task Force - Civil Support (JTF-CS) during and after the activation of the FRP (Terrorism Incident Annex).
8. Evaluate FOSC capabilities to identify a WMD incident and to request and obtain force augmentation to effectively respond.
9. Help initiate and provide a consistent USCG public information response through the Joint Information Center (JIC) at the TOPOFF Portsmouth, New Hampshire, field training exercise.

IV. NRT Exercise Observation Report Submitted to DOJ

Following Exercise TOPOFF and NCR 2000, the Department of Justice requested that all TOPOFF and NCR 2000 participants and planners from participating federal departments and agencies submit their exercise observation reports (EORs). These reports are to be compiled into the overall EOR to be submitted to Congress following agency review and comment. In response to the request, the NRT prepared an EOR that pertained to specific NRT issues observed during the exercises. Below is the EOR that was submitted to the DOJ on August 11, 2000. Agency-specific EORs (e.g., EPA, USCG) that were submitted are included as appendices to this report.

ISSUE:

To be effective and efficient, response to terrorist incidents should fully utilize existing systems, authorities, and assets. Over the past 30 years, the National Response System (NRS), as defined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) at 40 CFR Part 300, has been the system used by local, state, and Federal planners and responders for emergency planning, preparedness, and response to releases of hazardous substances, pollutants, and contaminants. During TOPOFF, the NRS performed well in its critical role of providing swift a Federal presence and assistance at the site. The ability to rely on this established system that operates daily around the country is important because the response to incidents involving weapons of mass destruction (WMD) could typically begin as, and will eventually evolve into, a hazardous materials response. Notwithstanding, there were areas where NRS processes and guidance were not fully utilized that could have strengthened the overall response effort.

SUPPORTED EXERCISE OBJECTIVES: (FCO #5, FCR #5, FCO # 84, FCO #93)

DISCUSSION POINTS:

Because the NRS has response assets located in each standard Federal region across the country, U.S. Coast Guard (USCG) and Environmental Protection Agency (EPA) Federal On-Scene Coordinators (FOSCs) were able to respond to the scene within the first hour of the Portsmouth incident and remained on-scene throughout the response. These FOSCs are backed by the 16 member agencies that comprise the Regional and National Response Team(s) of the NRS. NRS member agencies can provide the critical resources, assets, and expertise needed by FOSCs during a response, such as the USCG's National Strike Force and EPA's Environmental Response Team. Because the Portsmouth incident took place in a coastal area, the USCG assumed the role of the FOSC under the NCP and was immediately able to provide assistance to the local responders by activating the CERCLA funding mechanism (e.g., SUPERFUND) and requesting Federal assistance and assets, including a technical assistance team from Boston. Once the Presidential Disaster Declaration was established, the NRS response authorities and assets transitioned smoothly into the overall Federal response as outlined in the Federal Response Plan (FRP).

However, there were several areas in which the response effort could have been improved had the NRS procedures and guidance been followed by all exercise participants. Exercise participants did not fully utilize the existing and proven notification system currently in place for hazardous substance releases, which is the National Response Center (NRC). The benefit of a single call to the NRC is that it can efficiently activate the 16 member agencies of the NRT. While their activation was accomplished through local connections in the venues, the NRC could have ensured more rapid and complete

notification. Regarding effectively implementing NRS guidance, the NCP, in addition to other Federal plans and procedures, recommends managing the response and integrating response decisions and actions through implementation of a Incident Command System/Unified Command (ICS/UC). Though there was coordination, the lack of a true ICS/UC in Portsmouth resulted in some confusion among responders and the ineffective and inefficient management of some resources, including available technical knowledge and expertise.

The authority, roles, and responsibilities of the NRS and its partners are described in the National Contingency Plan (NCP), 40 CFR 300, the Emergency Planning and Community Right-to-Know Act (EPCRA), 42 U.S.C. 11001 et seq, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9601 et seq. The NRS is also part of the federal response to complex natural and technological disasters, through Emergency Support Function (ESF) #10 of the Federal Response Plan (FRP), which outlines Federal response to hazardous substance releases following a Presidential Disaster Declaration.

REMEDIES/RECOMMENDATIONS:

1. The Federal WMD response and preparedness community, led by the FBI and FEMA, should become fully conversant on the NRS and incorporate it in WMD planning and response. To that end, the NRS, relying on its NRT member agencies, should develop outreach materials in partnership with the WMD community. These materials should focus on the knowledge, understanding, and assets of the NRS and the use of the NRC in planning for and responding to a WMD event. The goal of this effort is to ensure that the NRS is alerted and activated as appropriate. This effort should be targeted towards all responders, including local, state, and Federal, who may be part of the WMD community.
2. The National Response Center should serve as the focal point for notifications. Events that warrant notification include those that pose a possible threat to public health, safety and the environment. These events include those involving WMD. To accomplish this, the National Response Team (NRT) and the NRC should complete a review of current procedures and expectations for notifications during a WMD event and, in concert with the WMD community, develop an action plan to implement any recommended improvements or changes. Areas that should be examined include the effective and manageable process for receiving and disseminating such notifications.
3. The WMD planning community (e.g., DOJ, FEMA and DOD) should promote the incorporation of WMD plans and programs into existing local plans. The NRS already has an existing planning structure that includes local, area, and Federal plans, as defined at 40 CFR Part 300, Subpart C. Local plans include Local Emergency Planning Committee plans pursuant to EPCRA and Area Contingency Plans pursuant to the Oil Pollution Act. To accomplish this integration, the WMD community and the NRS should develop guidance related to area and local planning.
4. The Federal government should adopt the widely used National Interagency Incident Management System (NIIMS) ICS/UC system as the standard response management system at incident sites, including WMD incidents. To do this, the NRS, working in a partnership with the WMD response community, should develop a joint outreach and training program for all local, state, and Federal responders on NIIMS ICS/UC.

V. Overarching Observations

The following paragraphs present the major observations made throughout the course of Exercise TOPOFF play. More specific observations that correlate to particular NRS objectives tested in the Exercise are identified in Section V of this report. As scripted in the Exercise scenario, NRS involvement in Exercise TOPOFF was most prevalent in response to the Portsmouth chemical release. As a result, the following observations reflect a concentration on activities in Portsmouth. The Region VIII response was largely focused on mass casualty systems in response to the large-scale biological release that occurred in Denver and, therefore, did not involve the same level of NRS play.

Effective pre-planning proved to be beneficial. During the entire planning process, close coordination occurred at the headquarters level between EPA, the Coast Guard, FEMA, and DHHS. This pre-exercise coordination provided the necessary tools and framework to ensure that all involved agencies understood their own roles and responsibilities during the Exercise, as well as the roles and responsibilities of other response agencies. As a result, there was an impressive show of support by the numerous agencies that played in the Exercise, which facilitated an effective interagency response. Both in the numbers of resources and the organizational level of play, Exercise TOPOFF succeeded in testing and helping to define the government's role in a weapons of mass destruction (WMD) terrorist incident. EPA's concept of operations for TOPOFF, which included focusing exercise planning at the regional level as much as possible by appointing regional "trusted agents" early in the process, worked well thanks to the dedication of the Federal On-Scene Coordinators (FOSCs) in Regions I, III, and VIII.

Exercise control was effective and facilitated response coordination. Throughout the actual Exercise response, the Master Control Cell (MCC) facilitated a productive environment for information exchange and cooperation among response agencies. NRS member agencies were able to quickly huddle and sometimes affect response actions to be more realistic, for example. It was an effective approach to address the implications of an agency's actions on other involved agencies and to pass along a comprehensive and more accurate perspective of exercise play to the controllers in the various venues.

EPA and Coast Guard partnership demonstrated NRS leadership. A major USCG objective was to demonstrate appropriate USCG and EPA leadership and capabilities. One of the most telling indicators of successfully meeting this objective was that two agencies were "joined at the hip" in virtually every aspect of this Exercise. Because EPA and USCG acted as one in representing the NRS, they clearly demonstrated NRS leadership. Coordination between the two groups was evident throughout the exercise.

Pre-exercise NRT briefings should continue. In preparation for the Exercise, the NRT was briefed by the Department of Defense (DOD) Joint Task Force – Civil Support (JTF-CS), as well as by DOJ. Briefings such as these are imperative to ensure that the authorities, resources, assets, and capabilities of the NRS are recognized and understood by other agencies prior to a real world incident response and incorporated into planning and exercise mechanisms.

Attention to NRS/NCP role prior to the Presidential Emergency Declaration. The role of the NRS was especially prominent in the chemical scenario at Portsmouth, New Hampshire, where Coast Guard and EPA FOSCs showed the contribution that can be made via the National Contingency Plan (NCP) early in an incident. The Presidential Emergency Declaration under the Federal Response Plan (FRP) occurred faster than what had been expected in the Exercise scenario. Had the timing of the declaration more realistically occurred, deployments may have more fully evolved and allowed NRS issues to be played

out even further. Since they were not fully demonstrated due to artificialities in the Exercise, the National Response Team (NRT) must continue to work with response agencies to ensure that the role and capabilities of the NRS under the NCP are clearly understood and recognized.

National Response Center (NRC) role and procedures need support and clarification. Because notifications were not always conducted via the NRC as required and planned, they were not conducted as effectively as expected. The notification processes and procedures used by the NRC need to be reviewed and clarified, and other Federal agencies (e.g., DOJ, DOD, DHHS) need to ensure they use the NRS during a WMD event. This will require outreach and training by the NRC and WMD response agencies.

VNN/CNN set the pace and tone of TOPOFF. Virtual News Network (VNN) reports were professionally done, convincing, and very adept at depicting the status of the venues in a manner that kept pressure on the responding agencies. As such, it was an innovative method for exercise control. The use of actors and VNN provided the dose of reality to players, controllers, and top officials needed to pull them into the Exercise and continually emphasize the magnitude and intensity of the event.

Health and safety precautions need reinforcement. Proper health and safety precautions to protect responders and health care workers were not adequately enforced throughout the response. As a result, public safety concerns and the safety of responders is an issue that must be continually reinforced.

Crisis and consequence management should be better integrated. The overarching objective to conduct concurrent, integrated crisis and consequence management operations could have been conducted more smoothly. Observations from USCG field observers indicated that there was concurrent crisis and consequence management, but that it was not necessarily integrated. For example, the Joint Operations Center (JOC) seemed to operate independently of the Unified Command (UC).

Federal government needs improved and unified crisis communications. With an incident as newsworthy as a terrorist attack, the need for the Federal government to provide timely and factual information in a compassionate and coordinated manner is vital to maintaining civil order, calm, and trust. VNN broadcasts showed a credible state official providing statements to assure the public and wish condolences to the families of the victims in Region I; however, a similar Federal communication strategy was virtually non-existent. The statements from lead Federal officials for crisis and consequence management at the Portsmouth press conference did not express sympathy for the families of the victims and appropriate concern for the amount of time the bodies were left at the scene was not demonstrated. As a result, a lawsuit on behalf of the outraged families of the deceased was simulated on VNN. The Federal government needs to re-examine the Federal approach to crisis communication, which must ensure that a strong message of unity and security is relayed to the public during times of crisis. In addition, training in crisis communications should be provided to all Federal officials who might lead press conferences or communicate with the public during a major incident.

NCR separation from TOPOFF. The removal of NCR 2000 from TOPOFF decreased the overall effectiveness of the Exercise play. (For further elaboration, see the NCR After-Action Report on page 12).

VI. Observations Regarding Achievement of NRT/RRT Exercise TOPOFF Objectives

This section presents a summary of Exercise TOPOFF observations as they pertain specifically to the exercise objectives that relate to the NRS.

A. Activate the NRS and the NCP

NRT activation process needs clarification. During the Exercise, both RRTs I and VIII were activated in response to the Portsmouth and Denver scenarios, respectively. EPA Headquarters was also notified almost immediately following STARTEX. However, notification to the acting NRT Vice Chair and Executive Director, as well as other member agencies, did not occur as expected and NRT notification had to be prompted through controller activity. Because of the magnitude of the incident, Exercise designers had envisioned an NRT activation. As a result of the confusion, it was suggested that it is important to review the notification process and clarify the roles and responsibilities of the NRT during major incidents, such as that simulated in Exercise TOPOFF, in order to determine appropriate activation criteria. It should be noted that the backup system in place for NRT notification (through contractor support) was intentionally not used during Exercise TOPOFF.

It is important to recognize that the NRT will not automatically activate for all responses and, thus, all NRT agencies will not necessarily be notified. The NRT should be aware that certain NRT members may not be able to participate in NRT meetings or conference calls during an activation if they have other agency-specific response roles and obligations. The NRT is primarily a planning and coordinating organization and does not respond directly to incidents. However, during TOPOFF, the NRT held some meetings, which most likely would not have occurred to the same extent in a real world incident because some NRT member agency staff would be involved in other, more critical aspects of the response effort.

Notwithstanding this observation, several NRT member agencies commented that they were able to pass important information up their chains of authority to provide response assets, which would not have been possible if they had not been so closely informed of the incident. The NRT should function to support the FOSC and the RRT(s) and not to require information from the field. While representatives to the NRT have a legitimate need for information, it must be remembered that the role of the NRT is to support the RRTs. Too frequent requests for information from the NRT hinders response efforts. This is always one of the most difficult balances to find during any incident response. In some instances, it may be appropriate for the relevant RRT Co-Chair to participate in NRT meetings when the NRT is activated for an incident response. This could help ensure that correct and timely information is being circulated. As a result of participation in Exercise TOPOFF, the Department of Health and Human Services (DHHS) has identified the need to assign a communications coordinator during complex responses so that there is coordination among DHHS agencies and effective communication to the DHHS representative to the NRT.

B. Evaluate Ability to Provide and Serve as FOSCs

EPA and USCG FOSCs were provided in a timely manner. Both EPA and the USCG provided FOSCs when requested in a timely manner.

FOSC transition needs clarification. The transition from USCG to EPA went well in the crisis phase. The EPA FOSC was first on scene during the chemical scenario in Region I; however, since it was a

marine area incident, the Coast Guard FOSC assumed authority. Later the FOSC authority was passed to EPA for inland activity. EPA observed that there was some confusion regarding when a transition from the USCG FOSC to an EPA FOSC would take place for longer-term clean up activities. To add to the confusion, the JOC joint press release on day five of the Exercise included an EPA FOSC as the NCP spokesman for the hazardous materials cleanup. At this point, EPA was still a support agency to the USCG, and the EPA FOSC was placed in the position of having to speak on behalf of the USCG FOSC and left the public with the false impression that EPA was in charge of the clean up.

C. Examine the Federal Notification Mechanisms

NRC notification process was not effectively used. There is lack of clarity regarding whether notification to the NRC occurred within the first hour of play as expected. However, the NRC process of contacting NRT members did not occur as expected and, as a result, several NRT members were not notified in a timely manner or through the appropriate channels. Furthermore, in the Denver metropolitan area, it was noted that numerous agencies have developed a commonly used notification system that ensures rapid notifications. As a result, it is important to remember that the NRC serves as the primary means of notification for the NRS.

Potentially unrealistic expectation that the NRC will be notified for an explosion. The Exercise scenario indicated that many subsequent agency notifications relied on the initial notification to the NRC. Although most likely an oversight, the expectation that the NRC is notified for an explosion is not entirely realistic. It is not common knowledge by the average citizen, industry, or government agency that the NRC is the central notification point for explosions. The NRC is more commonly considered as the primary notification center for only oil spills and hazardous materials releases.

CNN/VNN tends to drive notifications. As clearly exhibited by the use of VNN, which simulated CNN broadcasts, CNN and other media coverage will likely drive notifications as agencies learn of incident events via the media. The result is that NRC notifications come via Federal personnel and others who see a news report on CNN; this happened during TOPOFF.

EPA Emergency Operations Center (EOC) functioned well. Once the EPA EOC was up and running, it functioned well as a central information entity for notification, coordination, and communication. However, in the event of a real world incident occurring on the weekend, it may be more difficult to obtain personnel to staff the EOC as quickly. In addition, the EPA Regional Coordinator in the EOC was overwhelmed. Although having only one EPA staff person to coordinate regional efforts in the EOC may not be realistic, obtaining more support in the EOC for regional activities must be considered.

D. Validate Deployment of Emergency Response Assets

Emergency response assets were on-scene quickly and completely. With the exception of EPA personnel deploying with the DEST to Region I, the deployment of emergency response assets went well. EPA Headquarters currently does not have the capability to deploy personnel quickly because staff need standing travel authorizations. At the Denver Center for the Performing Arts, an EPA FOSC and START team were on scene very quickly with the necessary resources. However, EPA and START contractors have important and useful capabilities that other agencies may not be aware of or often do not consider using, such as residential air monitoring and screening of equipment staging areas. It is important that these capabilities be reinforced to all NRT response agencies.

Deployment of medical resources and assets needs coordination. Many of the medical resources and assets are in reserve units and may take longer to activate. This needs to be coordinated sooner to avoid under-responding.

General difficulty obtaining DOD assets. There was a delay in DOD's response to the Coast Guard's request for use of the Chemical Biological Incident Response Force (CBIRF). The Coast Guard requested CBIRF prior to the emergency declaration via the RRT and DOD's Director of Military Support (DOMS). Once the Presidential Declaration was announced and FEMA assumed the lead for consequence management, the Coast Guard's request for CBIRF was denied because DOD indicated that the request should have come through FEMA to the Secretary of Defense and ultimately to CBIRF. This communications break down delayed the deployment of the CBIRF by almost 24 hours. As a result, it was recognized that DOD assets might not arrive in time to be helpful in hazardous materials incidents. Therefore, clarification is needed regarding DOD's support to the FOSC under the NCP before an FRP Declaration is made (e.g., DOMS or Joint Task Force – Civil Support [JTF-CS]).

Technical authorities are in the field and should be utilized. During the Exercise, there were many resources and assets at the state and local level with whom Federal personnel did not interact. Headquarters personnel do not have the necessary technical expertise and, as a result, the technical authorities in the field should be utilized. In addition, it is important that Federal agencies stay well coordinated with state and local personnel during the incident.

E. Evaluate Ability to Support the FBI and FEMA

Information from the JOC was difficult to obtain. Initially, the Region VIII JOC was not very forthcoming with much information to the EPA representative. In addition, briefings at the JOC were limited to a selected few agencies, which created problems for those agency representatives not privy to the briefings. As a result, it was difficult to obtain accurate new information and verify current information necessary for their agency's response efforts. However, as the exercise progressed, information was more effectively disseminated to EPA, as well as to other agencies.

Information transfer processes should be streamlined. Information transfer procedures within the FEMA Emergency Support Team (EST) were not as well coordinated as expected. Multiple requests were often received from different sources, which made coordination very difficult. As a result, it would be beneficial to examine and simplify the organization and information management system at the EST to streamline information flow.

Joint Information Center (JIC) operations need to be better coordinated. Two JICs were established in Region I that operated concurrently with the central FEMA JIC. While most responding agencies had representatives in the FEMA JIC (e.g., USCG, EPA), the separate JICs that were maintained throughout the response resulted in some confusion and a lack of information coordination and dissemination between response nodes.

Crisis and consequence management roles and authorities need clarification. The Consequence Management Group of the JOC was operated like a Disaster Field Office (DFO), which created a lot of confusion regarding FEMA's consequence management authorities. The Domestic Emergency Support Team (DEST) was unable to function well under this scenario because they had difficulty supporting crisis management activities. There was also confusion regarding the extent to which FEMA's authority as Lead Federal Agency (LFA) for consequence management allows them to manage all aspects of the response. For example, concern was expressed that the FEMA Forward Coordinating Team (FCT) was

directing the EPA FOSC without authority. Both consequence and crisis management roles and authorities need to be clarified among all response organizations and EPA and PHS should similarly clarify their authority to manage hazardous materials sites, as appropriate.

Once the ESFs were activated they concentrated solely on their own missions and isolated work areas. Under the FRP, once the various ESFs were activated, they tended to concentrate solely on their own missions, to the point of cordoning off work areas to keep people out. More cross-ESF communication (i.e., more interdisciplinary activity) would probably achieve better overall results. Certainly, in a real event, keeping fellow workers in the dark will be detrimental to the response.

F. Exercise Interagency Coordination Using an ICS/UC

Federal interagency response staff worked well together. At both Exercise sites, in general, Federal interagency staff coordinated and worked well together and with the Incident Commanders.

ICS/UC did not function as well as it could have. Three separate command centers were established within the Region I incident area (e.g., the scene, the Incident Command Post, and the JOC). The existence of three separate command centers created difficulties in communicating among the various agencies located at the various command sites (not communication among staff at the various sites). It is important to note that the communication being received and relayed was not incorrect; rather, the issue was difficulty contacting other responders. However, early establishment of a true ICS/UC would have facilitated communication. In addition, the location of the incident command post 4.5 miles from the hot zone left the local fire chief reluctant to leave the scene and give up tactical operational decisions. As a result, the off-site location of the command post may have hampered integration. Furthermore, the first responders on-scene at the Portsmouth van explosion initially resisted establishing a Unified Command (UC) with other response organizations. This may be because first responders do not understand the benefits of establishing or participating in a UC. As a result, additional outreach and training on ICS/UC should be provided to ensure that first responders, as well as all Federal responders, understand the benefits and advantages of establishing and participating in an ICS/UC.

In addition, Area Committees and Area Contingency Plans (ACPs) are designed to improve coordination among the national, regional, and local planning levels and to enhance the availability of trained personnel, necessary equipment, and scientific support that may be needed to adequately address all discharges. As a result, use and implementation of the area planning process is the ideal forum to educate, encourage, and plan for the use of ICS/UC by local responders.

Non-NRT agencies do not have a method to coordinate the various scientific voices during an event. Non-NRT agencies working outside of the NRS do not have a method to coordinate the various scientific voices during an event (i.e., a position akin to a Scientific Support Coordinator). There were many, sometimes conflicting, models and sources of advice that are presented. In any event, the Incident Commander needs to designate one individual to coordinate the scientific input to the decision-makers.

G. Other Observations

Using extensive acronyms made understanding the response difficult. NRT members with more experience interfacing with the counter-terrorism community were using a lot of acronyms during NRT conference calls. Those who are less familiar with terrorist response found the “name-dropping” and “acronym dropping” very difficult to follow. If the NRT wants to communicate well, all members need to be inclusive in their choice of vocabulary.

Difficulty understanding how the various response plans fit together and how responsibilities shift as an event unfolds. NOAA suggested that the NRT consider developing a short and general presentation to be presented at an NRT meeting or other appropriate venues that explains how all of the various response plans fit together (or how they should fit together). The presentation should also describe how responsibilities shift as an event unfolds.

Non-participating regions should be kept informed. It is a good policy to keep even the non-participating regions up-to-date, as most incidents are likely to evolve and may ultimately require additional outside assistance. For example, if Washington D.C. is affected and being covered by Region III, it is reasonable to expect that Region II would have to provide back up and help cover Region III responsibilities. As a result, it is good practice for all agencies and regions to be familiar with the incident scenario and prepared to support the response if necessary.

Mandatory measures should be expanded to protect local citizens. The State of Colorado was quarantined, which was helpful to confining the death toll to Colorado; however, stronger measures to protect the local Colorado citizens were not implemented. By Sunday afternoon and Monday morning, there were statements urging people to stay home and there were references to the Governor restricting travel; however, most of the information was presented as voluntary rather than mandatory. To survive a disaster of the magnitude presented in the Exercise scenario, the state must immediately take quick and decisive action to quarantine the population and enforce the “no contact out of your home” policy.

Obtaining information from the field should be addressed. It was noted that EPA Headquarters and Regional offices experienced difficulty obtaining field information and communicating with the FOSCs in the field. However, this may have resulted from the observation that too many conference calls were held during the initial stages of the response. It may be necessary to put additional response personnel into the field solely to address communication and information needs or to explore the use of technologies (e.g., VTS, digital) which will facilitate communication. The need for a communications coordinator during complex responses, as mentioned previously, is further evidenced by these findings. As noted previously, the legitimate information needs of managers must be considered in the context of the ability of the incident responders to provide information. There also should be full implementation of a single headquarters location dedicated to collecting and coordinating information (e.g., the EOC). The USCG R&D Center has produced a valuable report detailing the use of the software OSC², ICS reporting over a cellular link to the Internet, and NRC extracting data and posting them regularly on the Internet.

Senior management roles need defining. Regarding information flow within individual NRT member agencies, there was concern over the roles and responsibilities of senior management and the process for providing feedback.

Sustained actions were not played out. Following initial response efforts (e.g., sampling, analysis) at the Portsmouth incident site, very few efforts were conducted to mitigate the longer-term effects of the situation. Had the response effort continued beyond the initial response phase, these oversights would

most likely have contributed to severe deficiencies in the overall response effort, which could have resulted in gross environmental contamination and costly recovery expenses. As a result, it is critical that all NRT member agencies understand the importance of sustained mitigation and cleanup activities.

National Capital Region (NCR) 2000 After-Action Report

I. Background

The purpose of the National Capital Region (NCR) 2000 Exercise was to conduct a concurrent and complimentary exercise to TOPOFF 2000 that would assess the nation's crisis and consequence management capabilities in response to a radiological release. Like TOPOFF, these capabilities would be tested by exercising plans, policies, procedures, systems, and facilities through local, state, and Federal responses to a series of "no notice," integrated, geographically-dispersed radiological terrorist threats and acts. Co-sponsored by DOJ and FEMA, the focus of the Exercise was to examine the interfaces and relationships between participating agencies at the local, state, and Federal levels and to identify any seams, gaps, or redundancies in responsibilities that affect decision-making and subsequent actions directed to resolve the consequences of the simulated attacks.

As outlined in the Exercise scenario, a radiological dispersion device (RDD) exploded at St. Elizabeth's hospital on Saturday, May 20, 2000, at approximately 12:15 p.m., causing over twenty casualties due to wounds from the blast and fragmentation. Radiological contamination and psychological trauma immediately resulted from the explosion. The initial response involved the Metropolitan DC police and fire departments, Emergency Medical Services (EMS), FBI, and the Department of Energy (DOE). Follow-on response was provided by other Federal agencies, including FEMA and EPA. The following morning, at approximately 10:00 am, a RDD exploded at the U.S. Air Arena causing over 100 casualties. The initial response included the Prince George's county police and fire departments, EMS, FBI, and DOE. The State of Maryland and other Federal agencies provided follow-on response. The third and final event in the NCR Exercise involved the identification and takedown of the RDD assembly facility at Indian Head on Monday at approximately 4:00 p.m.

The EPA and USCG exercise objectives for NCR 2000 are the same as those for TOPOFF and can be found at the beginning of this report.

II. Overarching Observations

The National Capital Region (NCR) 2000 Exercise was originally designed to be the third component of TOPOFF and to exercise the nation's capability to respond to a terrorist-motivated radiological release while concurrently responding to the other national disasters. However, late in the planning stages, the decision was made by senior management to disconnect NCR from TOPOFF and play the two exercises as separate and distinct. As a result, there were a number of additional exercise artificialities introduced into play. Further, the response efforts of state and local agencies were very limited and involved only a partial day of play. Therefore, there was little to no ICS to UC transition and almost no participation by the state and local agencies in the FBI's JOC. In addition to the disconnect, "real world" resource conflicts also forced DOE to scale back participation and resource provision. Also, perhaps due to concerns of public perception, the data provided by controllers in the field were not consistent with generated models. This led to the conclusion that contamination was very limited with no off site impact. This severely downplayed the need for consequence management, which was almost nonexistent.

III. Observations Regarding Achievement of NRT/RRT NCR Exercise Objectives

A. Activate the NRS and the NCP

Conflicting opinions on the need to activate the RRT. The NRT and RRT III were not activated for the NCR 2000 Exercise. An incident-specific RRT activation may have been more likely had EPA been notified of an Emergency Support Function (ESF) #10 activation under the FRP. However, several members of the NRT commented that the magnitude of the incident warranted an activation of the RRT.

B. Evaluate Ability to Provide and Serve as FOSCs

Effective initial support. Region III's initial support to the EPA FOSC was exceptional. This was performed by the after-hours Duty Officer, who made additional notifications (internal and external) and arranged for contractor support while the FOSC was en route to the scene.

Unrealistic expectation to staff the JOC. The JOC was established at Bolling Air Force Base hours before the mock incident at St. Elizabeth Hospital occurred. This resulted in an unrealistic expectation that EPA would staff the JOC immediately upon notification, prior to any assessment. Since there was no mention of the JOC in the notification, this did not occur. However, once this expectation was made known, an EPA exercise controller at the JOC made an inject to the EPA representative at the Strategic Interagency Operations Center (SIOC), which resulted in the deployment of EPA's Office of Radiation and Indoor Air (ORIA) staff, and a Region III FOSC to the JOC. The deployment of ORIA staff to the JOC was timely and realistic.

Regional response was timely and effective. Dispatch of both an EPA Region III FOSC and the contract mechanism were utilized. However, with very short consequence management play, the ability of Region III and other response agencies to demonstrate their own capabilities and test their ability to interact with other agencies was drastically reduced. The Region III FOSC supported the Command structure with technical assistance, but additional assets were not requested or required.

C. Examine the Federal Notification Mechanisms

Notification information needs updating. The NRC was notified of the St. Elizabeth's incident on Sunday, May 21, 2000, at 1:28 p.m. by the FBI's SIOC. The NRC then notified Region III's Off-Duty officer, but minimal information was provided in the notification. EPA Headquarter's already had a liaison in place at the FBI's SIOC, due to earlier TOPOFF play. Upon learning of the St. Elizabeth's incident, the liaison notified EPA's EOC, who in turn made additional notifications. Minor difficulties were encountered by the EOC when attempts were made to notify Region III. This was due to the 24 hour Regional Response Center (RRC) phone being transferred to the NRC. It took approximately 15 minutes to track down a direct line to the Region III Off-Duty officer. Region III took this opportunity to provide the EOC with up-to-date contact numbers and has implemented a process to provide the EOC with the Removal Branch phone list on an ongoing basis.

D. Validate Deployment of Emergency Response Assets

ORIA personnel provided support to the JOC. Due to the reported incident location in the Washington, DC area and the potential of a radiological source, EPA Headquarter's ORIA was notified and technical support was requested. ORIA personnel responded and staffed the JOC offering technical assistance and response options to the field FOSC. In addition, ORIA personnel representing EPA in the JOC interacted well with DOE, FBI, and FEMA.

EPA deployed staff to the SIOC, EST, JOC, and JIC. EPA's response to staffing these command centers appeared to be timely and effective with the exception of the JOC. At the beginning of the NCR 2000 Exercise, the SIOC was already staffed by EPA Headquarters as a result of the TOPOFF incidents. EPA ORIA personnel, due to their proximity to the Washington, DC area, promptly staffed the JOC. Gaps in coverage by EPA regional personnel resulted in communication problems between FEMA, FBI, and the EPA FOSC associated with the transfer of DOE/FBI field data and the issuance of mission assignments from FEMA. The EPA Region III's public affairs community involvement coordinator promptly staffed the JIC.

Limited use of EPA capabilities or resources. EPA's response capabilities were significantly under-utilized during the crisis management phase of the incident. A more complete utilization of monitoring resources could be essential during an actual incident where evidence collection could have taken two to three days at each location. The EPA response contractors could be used to relieve DOE RAP personnel during a lengthy operation.

E. Evaluate Ability to Support the FBI

FOSC liasoned well with the local Incident Commander. Upon arrival on-scene, the EPA FOSC liaisoned well with the local Incident Commander and the FBI's On-Scene Commander. The FOSC communicated EPA's mission well and stressed the importance of source control measures. While the Region was prepared to exercise contractor support, it was deemed unnecessary given the changes made to the NCR 2000 scenario. The actions by the FOSC to provide run-off control at the St. Elizabeth's venue were simulated. In simulating the activation of the full resources of the Emergency and Rapid Response Services (ERRS) contractor, the FOSC demonstrated EPA's ability to support the FBI as the LFA.

F. Evaluate Ability to Support FEMA

Consequence management not played out. The consequence management aspects of this exercise were not played out in the field or at the JOC. The on-site exercise activities were terminated following the on-site collection of evidence by the FBI. The JOC was unexpectedly shut down with very little notification to the Exercise participants. EPA played out the consequence management support (mission assignment cost break down and scope) from the Headquarters EOC.

G. Exercise Interagency Coordination Using an ICS/UC

Unified Command not established. There was no firm establishment of a UC at either site within the NCR Exercise. The Incident Command that existed was utilized mostly in the crisis management phase of the Exercise with interaction mostly between the local responders and the FBI. The FBI did not establish a UC with other Federal response agencies and relinquished both sites to FEMA and DOE with

limited involvement in the transition phase in the field. An EPA Regional presence was recognized, but little support or capability was requested.

Liaison professionally established. The responding Region III FOSC reported and interacted directly with the FBI On-Scene Commander at both the St. Elizabeth and U.S. Air Arena venues. Liaison was established in a professional manner while identifying and offering the EPA's technical resources and assets to assist with the response. The initial response was under the authority of the fire service. As the nature of the event evolved, the FBI assumed responsibility.

H. Other Observations

Confusion over DOE or EPA lead. There was confusion regarding whether DOE or EPA has the lead for a radiological incident that is a result of a terrorist incident. Because several authorities, including the Federal Radiological Emergency Response Plan (FRERP), the Concept of Operations Plan (CONPLAN), and Presidential Decision Directive 62, provide conflicting responsibilities, DOE and EPA had difficulty determining who had the lead given the particular scenario. As a result, it may be beneficial to update the recently approved NRT document titled "Reconciling Coordination Issues Between the Federal Radiological Emergency Response Plan and the National Oil and Hazardous Substances Pollution Contingency Plan" to address counterterrorism incidents.

The transition from the NCP to FRP ESF #10 and the coordination of ESF #10 transitions between coastal and inland areas was not smooth. Although the transition did not occur very smoothly, the lessons learned were beneficial. FEMA Region III typically notifies EPA Region III of an ESF #10 activation through EPA Region III's RRC; however, this did not occur in this Exercise. This may have resulted because of FEMA Headquarter's involvement in the Exercise due to the proximity of the initial release to DC. FEMA's interaction with EPA Region III came from their EST (not the FEMA ROC) to the Consequence Management cell within the JOC. The Mission Assignment (MA) process was delayed because of the temporary absence of an EPA Region III representative at the JOC. Once this situation was resolved, EPA Region III interacted well with FEMA, and an MA was eventually issued for response activities at St. Elizabeth's. Another delay in the MA was due to the ownership of the property. The St. Elizabeth's site is owned by DHHS (and only operated by DC). Had consequence management play been carried out, a transition back to the NCP with a potentially responsible party (PRP) response may have occurred. In addition, there was no Emergency Declaration made for the second incident in MD, therefore there was no NCP to ESF #10 transition. It is not clear why the two venues were handled differently with respect to the declaration process. In addition, there was no transitional involvement with coastal and inland areas.

Cellular phone communication created difficulties. Occasional cellular phone communication problems between the FOSC and the JOC were encountered due to poor service in the local area. This did not have a significant impact on overall communications with the FOSC, however it is likely that during a real emergency cellular service would be poor or non-existent.

EPA not included in briefings. There were hourly briefings by FBI and FEMA to all JOC members; however, this information tended towards a "need to know" attitude, as was evidenced by EPA not being briefed on the impending FBI raid of the terrorist headquarters. This raid and the associated amount of force could have resulted in a release of a hazardous material. If notified, EPA could have been on stand by to initiate containment and the related remediation should a release be initiated during the raid or by desperate terrorists.

Difficulty accessing monitoring data. The difficulty accessing the monitoring data may have resulted from controller play in the field and the significant scale back in committed resources by DOE given the real world incident. However, these data are crucial for EPA to determine the initial extent of contamination and to establish action levels for the cleanup under the consequence management activities.

**Observations of the U.S. Environmental Protection Agency (EPA)
on Exercise TOPOFF and NCR 2000**

ISSUE #1: The response to the chemical release scenario in Portsmouth, NH did not fully recognize or utilize the existing response authorities and capabilities of the Environmental Protection Agency (EPA) under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Part 300).

SUPPORTED EXERCISE OBJECTIVE: (FCO # 4, FCR # 4, FCO # 84, FCO # 93)

DISCUSSION: The chemical scenario in Portsmouth, NH during Exercise TOPOFF highlighted the importance of using existing federal authorities and capabilities to support state and local responders in a WMD terrorist incident. The EPA and the U.S. Coast Guard (USCG), under the authority of the NCP (40 CFR 300), responded to the incident as they would to any hazardous materials release, providing the first federal response assets on scene. EPA's roles and responsibilities are particularly important in situations like the Portsmouth, NH, scenario because it may not be initially apparent that a hazardous materials release is intentional or terrorist related.

Throughout the exercise play, there were response elements critical to protecting the health and safety of responders, the public, and the environment that were addressed only by the EPA On-Scene Coordinator (OSC). These health and safety elements included:

- Air monitoring for offsite contamination in down-wind residential areas;
- Identification of storm drains in the hot zone as a potential pathway for the contaminant to enter water supplies;
- Monitoring for contamination in the response staging area; and
- Long-term cleanup.

EPA was not included in all key information briefings by the Lead Federal Agency (LFA) regarding response activities and decisions. EPA's ability to provide technical advice directly to the FBI during crisis management and to provide monitoring and long-term cleanup support during consequence management was not fully recognized.

One aspect of Exercise TOPOFF that may have led to EPA's authorities and capabilities not being fully recognized was the artificial pre-deployment of many of the federal response assets. EPA OSCs and their supporting response contractors are located in each of the standard 10 federal regions and have rapid response capability, often arriving on scene within a few hours. Many federal assets (e.g., Federal Emergency Management Agency (FEMA), Marine Corps' Chemical Biological Incident Response Force (CBIRF), and others) would typically take longer to arrive at an incident scene. The pre-deployment of other federal assets and their artificially rapid response time downplayed the importance of EPA as a primary hazardous materials responder and altered the routine roles that federal responders would have participated in at the exercise.

REMEDIES/RECOMMENDATIONS:

1. Ongoing regional and national efforts to coordinate the federal planning and response activities for weapons of mass destruction terrorist incidents should include EPA since it is one of the six

key federal agencies with responsibilities and capabilities identified in Presidential Decision Directives 39 and 62.

2. In future exercises and actual incidents, EPA and other key federal agencies should be included in all information briefings. EPA's ability to provide technical support and advice would likely be an important part of the decision-making process.
3. Future exercises should avoid artificial pre-deployment of response assets or appropriately time sequence the stages of the exercise.

ISSUE #2: In the event of a terrorist attack, the need for the federal government to provide timely and factual information is vital to maintaining civil order, easing the public's fears, and maintaining trust in the federal government. The federal government needs to ensure that public information and public affairs messages are coordinated and effectively disseminated among responding agencies and the public at both the local, state, and federal level.

SUPPORTED EXERCISE OBJECTIVE: (FCO # 6, FCR # 6, FCO # 7, FCR # 7, FCO # 86.2, FCO # 93)

DISCUSSION: The effective management of information through a central source is vital to ensure an effective response to an emergency and to alleviate the public's fears. During the Portsmouth scenario of Exercise TOPOFF, separate agency Joint Information Centers (JICs) were operating concurrently with the central FEMA JIC. While most responding agencies had representatives in the FEMA JIC (e.g., U.S. Coast Guard, EPA), the separate JICs that were maintained throughout the response resulted in some confusion and a lack of information coordination and dissemination between response nodes. To address issues like these, the National Response Team (NRT) led the development of guidance documents on the purpose and operations of a JIC during a hazardous materials emergency response.

REMEDIES/RECOMMENDATIONS:

1. Future exercises should work toward providing emergency public information through a unified JIC based on the model developed by the NRT.
2. Future exercises need to educate the federal response community concerning how FBI and FEMA coordinate public information so that individual agency information and public affairs messages can be coordinated at the federal level.
3. Future exercises should include better two-way flow of information between the JIC and Joint Operations Center (JOC) so that all responding agencies can be aware of information that is being released to the media.

ISSUE #3: There appeared to be some initial concern as to whether the Department of Energy (DOE) or EPA has the lead technical support role to the Lead Federal Agency (LFA) during a terrorist incident involving radioactive material or nuclear devices. During an actual incident, such uncertainty could affect the efficiency of the federal response.

SUPPORTED EXERCISE OBJECTIVE: (FCO # 16.2, FCR # 15.2, FCO # 86)

DISCUSSION: The Federal Radiological Emergency Response Plan (FRERP) provides the following summary (Table II-1) indicating which agency will serve as the LFA for radiological emergencies, which contributes to the confusion concerning a terrorist incident:

Table II-1.-Identification of Lead Federal Agency for Radiological Emergencies	
Type of emergency	Lead Federal Agency
1. Nuclear Facility:	
a. Licensed by NRC or an Agreement State	NRC
b. Owned or Operated by DOD or DOE	DOD or DOE
c. Not Licensed, Owned, or Operated by a Federal Agency or an Agreement State	EPA
2. Transportation of Radioactive Materials:	
a. Shipment of Materials Licensed by NRC or an NRC Agreement State	NRC
b. Materials Shipped by or for DOD or DOE	DOD or DOE
c. Shipment of Materials Not Licensed or Owned by a Federal Agency or an Agreement State	EPA
3. Satellites Containing Radioactive Materials	NASA or DOD
4. Impact from Foreign or Unknown Source	EPA
5. Other Types of Emergencies	LFAs confer

Presidential Decision Directives (PDDs) 39 and 62, which take precedence for terrorist incidents, clearly define the responsibilities of the responding federal agencies. Under PDD 39, FEMA is the LFA for consequence management and under PDD 62, DOE is the lead technical support agency for consequence management in a radiological/nuclear scenario. This relationship, which remains intact for the entire course of the response, is analogous to the LFA role of the Nuclear Regulatory Commission (NRC) during and after an accident at a nuclear power station; the NRC remains the LFA, although involvement of other federal responders may change as the nature of the response changes. Likewise, DOE would remain the lead technical support agency.

REMEDIES/RECOMMENDATIONS: The FRERP should be revised to reflect PDDs 39 and 62 regarding terrorist incidents involving radioactive materials or nuclear devices. Similarly, clarifying language should be incorporated into the U.S. Government Interagency Domestic Terrorism Concept of Operations Plan (CONPLAN) and the Federal Response Plan (FRP) to avoid confusion that could detract from an effective federal response.

ISSUE #4: The use of the terms “crisis management” and “consequence management” and attempts to separate the response into distinct phases led to confusion over the specific roles and responsibilities of federal responding agencies.

SUPPORTED EXERCISE OBJECTIVE: (FCO # 1, FCR # 1, FCR # 38, FCO # 87)

DISCUSSION: EPA has responsibility and authority under Presidential Decision Directives (PDDs) 39 and 62 to provide technical advice and support to FBI during crisis management. While FEMA does have responsibility to coordinate federal support to state and local responders under consequence management, it does not have authority to direct EPA in its role of providing advice and support to FBI under crisis management or in EPA’s role under the National Contingency Plan (NCP). The crisis management scenario at the second incident in Portsmouth, NH was mismanaged because FEMA attempted to direct the other federal agencies in lieu of the FBI.

During consequence management, EPA should be given responsibility to manage its response activities in a hazardous materials response situation, as it would normally do as Lead Agency for Emergency Support Function (ESF) #10 – Hazardous Materials of the Federal Response Plan (FRP). Under ESF #10, FEMA issues a Mission Assignment to EPA or the U.S. Coast Guard (USCG). EPA or USCG then carry out that Mission Assignment. Although FEMA sent a representative to the incident scene to form the Forward Coordinating Team (FCT), there was no appropriate role or need for the FCT.

REMEDIES/RECOMMENDATIONS: The six key federal agencies identified in PDDs 39 and 62 should work to more clearly define the roles and responsibilities of each agency during all aspects of a federal response to a weapons of mass destruction terrorist incident.

ISSUE #5: There was confusion over the process for obtaining Department of Defense (DOD) assets in support of a response under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300) and under the Federal Response Plan (FRP) during the terrorist chemical release scenario in Portsmouth, NH.

SUPPORTED EXERCISE OBJECTIVE: (FCO # 3, FCR #3, FCR # 37, FCO # 64 FCO # 98)

DISCUSSION: The federal On-Scene Coordinator (OSC) from the Environmental Protection Agency (EPA) for inland emergencies and the U.S. Coast Guard (USCG) for coastal emergencies, when responding to a hazardous materials incident under the NCP (40 CFR 300), has the authority to request the deployment of DOD assets to support response activities. When a Presidential Disaster or Emergency Declaration is issued, EPA’s authority under the NCP remains in effect through Emergency Support Function (ESF) #10 of the FRP.

Requests for support from the federal OSC have been directed through the Director of Military Support (DOMS). The formation of the Joint Task Force for Civil Support (JTF-CS) to provide DOD support to civil authorities in a terrorism incident has created confusion regarding the appropriate channels of communication and process for requesting support. During exercise play in Portsmouth, NH, the procedures for obtaining the necessary DOD support were not understood by all parties involved in the response. This led to a delay in the deployment of DOD assets to support the federal OSC, in this case the USCG.

REMEDIES/RECOMMENDATIONS: Key federal agencies involved in terrorism incident response under the NCP (40 CFR 300) should work to clarify the process for obtaining DOD support.

POC: Hans Crump, U.S. Environmental Protection Agency, Washington, D.C., (703) 603-8821

**U.S. Coast Guard Lessons Learned on Exercise TOPOFF
Submitted to the U.S. Department of Justice**

1. Title of Lesson Learned: Lack of Unifying Doctrine between Command Nodes

Observation: Too many command nodes, geographically separated without a common unifying doctrine.

Discussion: There is a need to emphasize an inter-agency unified doctrine across the federal government with unifying technology, which overcomes geography. An example of such unifying technology is multicast Private Video Teleconferencing as demonstrated by the Coast Guard in this exercise.

Lesson Learned: A single unified management doctrine should be utilized by all federal agencies participating in a Unified Command response activity.

Recommendation: Organize an inter-agency working group to select a single doctrine (ex: ICS, JOPES) under which multi-agency Unified Commands will operate.

2. Title of Lesson Learned: First Responder Situational Awareness

Observation: WMD initial situational awareness by First Responders needs additional investment.

Discussion: TOPOFF in Portsmouth, NH had many examples of too rapid entry into the hot zone to rescue people without proper protective equipment and before the nature of the situation and extent of contamination was determined. Exercise play did not emphasize the hazards of this issue. Scripting did not include First Responders succumbing to hazardous material exposure as a result of early, inappropriate entry into the hot zone. In an actual situation, First Responders would have become ill and/or died as a result, adding additional management burdens to the FOOSC during a crisis situation.

Lesson Learned: First Responders need additional awareness training to properly identify WMD situations prior to hot zone entry and recovery of victims.

Recommendation: Provide all First Responders with WMD response training to increase awareness of and identification skills for WMD incidents.

3. Title of Lesson Learned: USCG Strike Team Class “A” Capabilities Vital to FBI

Observation: USCG Class Alpha equipped teams provided vital assistance to the FBI.

Discussion: In a WMD situation, the FOOSC and the FBI need rapid access to the teams that are equipped and trained with Class Alpha protective gear. The ability of the NH National Guard Civil Support Team, the EPA-START contractor and the USCG Atlantic Strike team to arrive on scene rapidly with this capability enhanced the ability of the FBI to complete its crime scene investigation

and gather evidence. Early entry into the Hot Zone for criminal investigation and evidence collection is vital to the ultimate prosecution of the perpetrators of a WMD incident.

Lesson Learned: Although DOD assets may possess superior WMD response capabilities than other assets, the ability to rapidly deliver assets to the scene provides greater value to the FBI investigation.

Recommendation: Continue to develop inter-agency relationships between the FBI, USCG, EPA and other organizations to facilitate rapid deployment of response assets with Class Alpha capabilities.

4. Title of Lesson Learned: FOSC access to rapid response resources

Observation: Current policies on accessing Joint Task Force Civil Support resources during WMD incidents limit rapid response capabilities.

Discussion: Current procedures to access DOD resources through DOMS are ambiguous and limit access. A senior spokesperson for JTF-CS indicated that the current policies as exercised during TOPOFF will not change.

Lesson Learned: Reliance on DOD for rapid response resources may not meet the FOSC's situational needs for WMD response.

Recommendation: The inter-agency community should develop relationships with other agencies (USCG, National Guard, EPA, etc.) in addition to DOD to more rapidly (first 24 hours) obtain forces with Class Alpha rapid response capabilities.

5. Title of Lesson Learned: Enhanced WMD/CT Capabilities Derived From Close FBI-USCG Partnership

Observation: The TOPOFF exercise demonstrated that understanding mutual support capabilities and the use of Coast Guard authorities greatly enhances the effectiveness of the FBI both in the field and in the SIOC.

Discussion: During TOPOFF, Coast Guard liaison officers actively participated in both the Joint Operations Command (JOC) on-scene and the Special Incident Operations Center (SIOC) in Washington, DC. These LNOs aptly demonstrated the ability of the USCG to cooperatively support the FBI in WMD operations. The USCG and FBI have a generic Memo of Agreement (MOA) at the national level. TOPOFF participants recognized the potential usefulness of regionally specific annexes to the CG-FBI MOA which cross-reference the area response plans of the National Contingency Plan and spell out how the FBI can more quickly get support from the Strike Teams (including CG cost reimbursement).

Lesson Learned: Expansion of the current CG-FBI MOA to include regionally specific annexes, cross-referencing area response plans of the National Contingency Plan will benefit the response capabilities of both agencies.

Recommendation: Form a CG-FBI working group to develop an expanded MOA which optimizes the ability of the CG to assist the FBI with WMD incidents occurring in the Maritime Zone. Address specific legal authorization and mutual authority to optimize law enforcement operational effectiveness.

6. Title of Lesson Learned: Improved Interagency / Intergovernmental Public Affairs Coordination

Observation: At the disaster site, a common "Federal Voice" is needed to convey concern, sensitivity and information for victims, their families and the general public.

Discussion: Public Affairs and the Joint Information Cell failed to convey a sensitive concern on the part of the Lead Federal Agencies as the victims' bodies in the hot zone were left exposed to the elements for a lengthy period of time. While this occurrence may have been the result of miscommunication between federal agencies and the State of New Hampshire Medical Examiner, the apparent lack of official sensitivity to this situation created a potential public relations and legal nightmare. The technological ability of various news organizations to provide real time reports on the situation simply exacerbates an already bad situation. Good public affairs is key to the public's perception of a successful official response to any incident.

Lesson Learned: A single public affairs voice, representing all responding agencies, providing timely, informative and compassionate information is critical to perceived success of any response.

Recommendation: The National Contingency Plan (NCP) and the Federal Response Plan (FRP) should be expanded to include specific guidance on conducting multi-agency public affairs when responding to a contingency situation. The National Response System has an excellent guide that could be applied effectively.

7. Title of Lesson Learned: Force Sustaining Challenges

Observation: Sustaining of rapidly deployed Coast Guard units is a challenge in extended operations.

Discussion: USCG forces hit the ground running and were stretched extremely thin for around the clock operations. The high level of activity could not have been sustained much beyond the 48-hour point without follow-on flow of CG forces, properly trained in ICS and HAZMAT/WMD response procedures.

Lesson Learned: Vital support capabilities that can be provided by the Coast Guard to the FBI need to be resourced in the budget if they are going to be better sustained in the field.

Recommendation: USCG initiate resource proposals for training and equipping USCG response teams which are sustainable in extended contingency operations, especially when supporting the FBI and other agencies. Develop effective back-fill plans for extended periods of up to 30 days.

8. Title of Lesson Learned: Improved Technology Essential For Response Operations

Observation: The National Response Center demonstrated and validated several important technology initiatives during TOPOFF.

Discussion: TOPOFF provide a venue for the National Response Center to validate several technology initiatives in an operational setting. They were: (1) Two-way text pagers that could exchange WAP webpage information between the NRC and the FOSC; the Incident Command System Software (OSC2) which transmitted between the FOSC and the NRC via a laptop cellular modem; (3) integration of the FOSC's Incident Action Plan, Situation and Pollution Reports, and Digital photos onto the DOT AIM reporting system allowing simultaneous access to information by the entire chain of command; (4) Nextel wireless telephones provided tactical linkage between the FOSC unified command post, the forward incident command post, the FBI in the Joint Operations Command (JOC), and field teams working near the hot zone; (5) multicasting on private video teleconferencing among all levels of the chain of command and exercise control including rebroadcasting the Virtual News Network (VNN) to the FOSC unified command post provided all organizational levels with real time information; (6) provision of a "fly-away" complete backup INMARSAT satellite data communications packaged prevented the possibility of cellular data link failures.

Lesson Learned: Leveraging technology significantly improves the quality and timeliness of information transmission throughout the response organization. Simultaneous access to a common operational picture by the decision-making chain of command helps to minimize spin-control or mistakes in situational awareness and ensures that appropriate focus is made towards providing the field commander with all necessary logistics and follow-on operational support.

Recommendation: Include provisions for enhanced communications packages and portable, private video teleconferencing in all response plans.

9. Title of Lesson Learned: Lack of Interagency/Intergovernmental Awareness to Notify NRC

Observation: State, local or federal participants did not call The NRC until prompted by the SIMCELL.

Discussion: The NRC is the central nerve system for inter-agency notification. Failure of the responding state, local and federal agencies to notify the NRC of the Portsmouth, NH explosion until over 4 hours after the event, delayed inter-agency response to the National Response Team and key officials in the National Response System. This highlighted the importance of marketing the role of the NRC to the public. Agency standard operating procedures should emphasize calling the NRC immediately. This is not merely an administrative requirement but is critically linked with marshalling rapid federal and state assistance. We need to get the word out!

Lesson Learned: Greater awareness of the NRC's responsibilities and capabilities is needed at all levels of the inter-agency (federal, state, local) response system.

Recommendation: Develop and implement an aggressive marketing program to inform all responders (federal, state and local) of the roles, responsibilities and capabilities of the National Response Center.