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NUCLEAR SAFETY ADVISORY COMMITTEE

Review Group 4 report of a meeting to discuss public information aspects of nuclear emergency response - Friday 22 February 2008, at Rose Court.

**Paper by Rod McKenzie,
on behalf of RG4**

Those attending:

NuSAC – RG4

Barry Cripwell (Convener)
John Billard
Sheila Ashford
Rod McKenzie

BERR

John Foggo (Acting Director, Nuclear Policy)

MOD

Andrew McFarlane (Defence Nuclear Safety Regulator – Director)
Stan Cameron (AD Nuclear Accident Response)

Scottish Government

Bobby Ronnie (Head of Unit, Energy and Telecoms Resilience)

INTRODUCTION

1. This paper reports on a meeting of NuSAC RG4 with MOD, BERR and Scottish Executive representatives to discuss how improvements might be made in arrangements for developing and disseminating public safety information in emergency response at licensed civil and military nuclear sites.
2. The meeting was a follow-up to the RG4 report to the October 2007 NuSAC meeting, which reiterated the group's concerns about poor exercise performance regarding the public safety information aspects of emergency

response. These concerns arose from NuSAC observation at Level 3/Grade A exercises over a number of years¹.

SUMMARY OF RECOMMENDATIONS:

3. RG4 would like the lead organisations responsible at national (GB) and local level for preparation and response to nuclear emergencies to look at:
 - R1 - Methods of plugging the information gap in the early stages of an emergency;
 - R2 - A more modern approach overall to communicating with people and the media;
 - R3 - Integrating nuclear arrangements with the wider generic approach to civil contingencies ;
 - R4 - A more realistic approach to information co-ordination and output arrangements at local area Strategic Co-ordinating Group level;
 - R5 - Incorporating any effective changes resulting from the above in national level guidance and training for senior responder staff at local area level.

Details of actions to implement these recommendations are given in paragraphs 16 to 20 and main points from the discussion leading to them are given in paragraphs 4 to 15 below.

DISCUSSION:

4. The aims of the meeting were to identify:
 - Where the problems lay;
 - To look at possible solutions; and,
 - To consider how NuSAC and RG4 could best take the issue forward with the lead organisations involved at national (GB) and local area levels.

The discussion was based on a briefing note from RG4 based on its past observation at exercises. Main points from the discussion are summarised below.

5. There was general agreement that improvements are needed, particularly in the early stages, in the handling of public safety information in exercises and potentially, therefore, in real emergency situations. It was also recognised that

¹ RG4 Report to NuSAC October 2007, NuSAC (2002) P6, RG4 Short Sermon 2004 Report, RG4 Exercise OSCAR Report October 2006, etc.

a number of factors had a negative effect on performance in exercises. Some of these factors had been pointed out in previous NuSAC reports but not followed up by lead organisations. Some additional factors were identified during the discussion. These all need to be addressed to improve preparedness for dealing with real incidents. Recommendations on how this should be done are made below.

6. Given that some of these problems had been reported by NuSAC on a number of occasions without any resulting improvements, discussion then centred on identifying the key organisations responsible. The group also discussed how RG4 could best target circulation of its reports to key organisations, persuade them to recognise its concerns and implement its recommendations.

Early Provision of Advice to Strategic Co-ordinators

7. The Police lead at local area level (strategic/"gold" co-ordination) on co-ordination and output of public safety information in emergency response. In carrying out this role, the Police need timely and expert briefing on the emergency situation current and the risks and possible actions to be taken in formulating their public safety strategy. The Government Technical Adviser (GTA – usually a senior NII inspector) is the main external advisor on public safety at local strategic level. However, the GTA tends to arrive later in the day and something more is required in the intervening period to provide early information to the Police from expert advisors from health and other agencies, possibly including more use of pre-prepared material.

Review and Update of Methods of Communication

8. There is also a tendency in local arrangements to focus on a Media Briefing Centre (MBC) and press briefing approach for the output of public safety information. This is a valid approach, but in a world of rapidly changing methods of communication and the realities of 24/7 media, "citizen journalists" etc, emergency arrangements for communication with the public need to be widened and modernised. Professional communications managers from all the lead organisations should be involved more with that process².

Early Provision of Public Information

9. Some urgent further attention is required to develop methods for communicating information to people in the early stages of an emergency. RG4 recognises that the BERR Nuclear Emergency Planning Liaison Group (NEPLG) has taken steps to address some of the issues concerning effective management of MBCs through its media sub-group and revision of the "Co-ordinated National Media Emergency Plan". However, the setting up of MBCs still takes too long and this process needs to be improved. Furthermore, information needs to be communicated BEFORE the issuing of the first press release.

² An example of updated guidance on Communications topics – "Warning and Informing Scotland, Communicating with the Public", Scottish Government 01/08 <http://www.scotland.gov.uk/Publications/Recent>

Alignment with Generic Civil Contingencies Arrangements

10. Local authorities lead on nuclear off-site planning/preparation under The Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPIR)³. There are however a number of changes to emergency response arrangements in general which impact on nuclear arrangements and result from implementation of the Civil Contingencies Act 2004 – CCA⁴ (e.g. formation of Local Resilience Forums – LRFs and Strategic Co-ordinating Groups - SCGs) and from lessons learned from actual emergencies (e.g. Cabinet Office “STAC” guidance on providing expert advice to emergency co-ordinators⁵).
11. For example, the location of strategic/”gold” co-ordination at generic LRF/SCG centres, more remote from nuclear site areas, leads to longer lines of communication between the centres responsible for information exchange important in developing public safety strategy. Although nuclear response arrangements are regulated separately from those for general civil contingencies, RG4 recommends aligning nuclear response arrangements where appropriate with generic arrangements to take advantage of any improvements which have been developed and to reduce any conflicts and confusions which might arise from having separate methods for doing essentially the same thing.

A More Realistic Approach

12. The exercise environment can contribute to an inward looking and unrealistic approach to communication. In reality, a number of external factors at a national level would affect the extent of local area Police overall control of public information output. For example, there has been an increasing level of central government involvement in general in public information management in real emergencies through COBR⁶ and this is likely to be the case in any nuclear emergency, in addition to the appropriate lead government department structures activated (NAIAG, NEBR etc) Lead Departments (MOD, BERR, DfT etc) have their own different approaches and capacities in relation to 24/7 information and media management. The Regional Government offices in England, the Welsh Parliament and the Scottish Government add an additional layer of government interest in public and media information in an emergency.

³ Link - [The Radiation \(Emergency Preparedness and Public Information\) Regulations 2001](#)

⁴ Due to be reviewed by Cabinet Office in 2008

⁵ Link - http://www.ukresilience.info/upload/assets/www.ukresilience.info/stac_guidance.pdf

⁶ See the Central Government 'Concept of Operations' (CONOPS) www.ukresilience.info/publications/conops.pdf – currently under review to include links with other government centres in specific emergencies including nuclear.

13. These issues are of course difficult to factor-in to planning/preparation and to exercising response. Their potential impact in real situations does however need to be given serious consideration, primarily by the Police and Local Authorities because of their lead roles in response and planning, but also by other key lead organisations involved in public safety e.g. Health Authorities and the Food Standards Agency.
14. There is a proposal, through the NEPLG, for the Government News Network to have a lead role in MBC management. RG4 recommends that discussion between the Police, Local Authorities and other lead organisations and government agencies and lead departments be taken much further than this to look at how a more realistic approach to communications in nuclear emergencies could be developed overall.

Guidance, Training and Exercising

15. Lead organisations should also consider how the outcomes from the recommended approaches to improvement detailed in this paper can be fed into guidance at national level and into national level training for senior staff responsible for decisions on public information in strategic co-ordination at a local level.

CONCLUSIONS AND ACTIONS:

16. In summary, RG4 would like the lead organisations to look at:
 - Methods of plugging the information gap in the early stages of an emergency;
 - A more modern approach overall to communicating with people;
 - Integrating nuclear arrangements with the wider generic approach to civil contingencies;
 - A more realistic approach to information co-ordination and output arrangements at local area SCG level; and
 - Incorporating any effective changes resulting from the above in national level guidance and training for senior responder staff at local area level.

NuSAC engagement with lead organisations

17. Considering NuSAC's remit, the observers from lead departments and operators are the most appropriate contacts through which RG4 can engage to report on and discuss its concerns with national (GB) level lead organisations involved in nuclear response.
18. The BERR Nuclear Emergency Planning Liaison Group (NEPLG) and the Scottish Nuclear Emergencies Group (SNEG) are the most appropriate routes through which RG4 can engage with the professional organisations of the lead responders (e.g. ACPO/ACPOS, EPS) responsible for preparation and

response at the local area level. The NEPLG media and training sub-groups are the most appropriate to deal with the RG4 recommendations on communications and training.

- **Action 1:**

With the agreement of BERR, RG4 to copy its reports for consideration by the NEPLG, particularly the media and training sub-groups for the issues raised in this paper. RG4 also to receive copies of NEPLG sub-group meeting agendas, minutes and papers;

- **Action 2:**

RG4 to arrange through the relevant NuSAC observers for copies of its reports to be distributed to appropriate divisions of lead government departments and agencies and through NEPLG to local responder professional organisations.

- **Action 3:**

RG4 to ask HSE to publish non classified NuSAC and RG reports on its website, in addition to agendas and minutes of meetings, to make these more easily available to a wider audience.

Guidance and preparation for nuclear emergencies

19. The opportunity should be taken to align nuclear emergency response guidance with the generic civil contingencies arrangements being developed under the CCA 2004 and other drivers such as lessons from real emergencies.

- **Action 4:**

NuSAC RG4 to discuss with the HSE/NII possible changes to REPIIR and/or to the associated HSE guidance based on the recommendations in this paper;

- **Action 5:**

NuSAC RG4 to discuss with BERR possible changes to the NEPLG Consolidated Guidance based on the recommendations in this paper.

Exercises

20. The next Level 3 exercise “Leadon” is at the British Energy Sizewell B site in August 2008. This offers an opportunity to introduce and try out at least some of the improvements in public safety information arrangements recommended in this report. RG4 would also like to have a group member observe at some of the planning meetings for this exercise. RG4 would also like the same approach to be adopted by MOD for the next Grade A exercise in 2009.

- **Action 6:**

RG4 to ask BE, through BERR, to consider including some of the approaches to improving public safety information arrangements suggested in this report in their planning for the Level 3 exercise to be held at Sizewell B in 2008;

- **Action 7:**

RG4 to ask BE, through HSE/NII, to have a member attend as an observer at some planning meetings for the exercise;

- **Action 8:**

RG4 to ask MOD to consider including some of the approaches to improving public safety information arrangements suggested in this report in their planning for the Grade A exercise to be held in 2009;

- **Action 9:**

RG4 to request through HSE/NII to observe at the BE 2008 Level 3 and MOD 2009 Grade A exercises.
