

Pages	Section	Description of Changes	HPC Dam Safety Subcommittee Comments
		General	<p>Overall, the FERC has done a good job with this document and drafted it with plain, understandable language. For the most part it is an improvement over the previous version.</p> <p>We do appreciate the use of soft language throughout much of the guidelines like: "recommend" and "should", instead of "you shall" or "must." That said, there are still some parts that are unnecessarily prescriptive.</p>
1	6-1	Modified Purpose and Scope to highlight what is in Chapter.	
2-6	6-2.2	Added new sections describing schedules for EAP Submittals and Exercises.	<p>6-2.2.4</p> <ul style="list-style-type: none"> • This time frame is unreasonable. • What constitutes a significant revision? • It is extremely burdensome to require changes to the EAP for all document holders more than annually. If the changes do not have a significant impact there should be no requirement for an update. • It is exceedingly difficult to make and distribute changes within 30 days of the notification of the change. Please make this requirement a recommendation and change the window to 60 days from being notified. <p>6-2.2.5</p> <ul style="list-style-type: none"> • This time frame is not reasonable. • Status report within 30 days is not reasonable. The result will be letters that are not complete. Less than half of the EMAs will show up. • This text may not be clear as to 30 days from which meeting? • A reprint can cost a licensee a lot of money. You don't want to be doing this real often. • We have been ok with the previous arrangement with an annual report. We suggest sticking with this. • An alternative would be to submit an annual EAP schedule, if the need is to spread the reports out through the year. • What FERC really wants to know is that the licensees have thought through what they are going to do and have a

			<p>schedule.</p> <p>6-2.2.6 Annual reconnaissance is burdensome.</p>
11	6-3.1.8	Added new section on EAP document security.	<p>6-3.1.8</p> <ul style="list-style-type: none"> • It is not reasonable to try to tailor the versions of the EAP to each EMA. It is reasonable to have a short form for all of the external agencies. You only need two versions of the EAP: one internal and one external. • Some licensees have simply removed all sensitive information from all of their EAPs. • We need to be telling the EMAs what is in the EAP, not asking them. It is hard enough to get these guys to come to a meeting, much less agree on content. • Face to face meetings are interpreted to be with only actual first responder agencies. This should be clarified.
11-12	6-3.2.1	Noted that changes to the EAP format must be agreed upon by all plan holders and explained to the Regional Engineer.	<p>6-3.2.1</p> <ul style="list-style-type: none"> • PP2 It is unreasonable to try to get agreement from EMAs on content. • PP3 Same as above. You don't need lots of different versions of the EAP. The critique in the functional drill is the best mechanism for getting input from the agencies and making revisions to the EAP. • If the intent here is to deviate from the FERC format, rather than content, then checking with the EMAs is ok.
17	6-3.2.2 I	Revised sample notification flowchart.	
18	6-3.2.2 III	Added sentence on document security.	<p>6.3.2.2 III</p> <p>This gives backhanded permission for a short form.</p>
19 & 21	6-3.2.2 IV	Referred to Non-Failure Emergency Condition as Condition C.	<p>6-3.2.2 IV</p> <ul style="list-style-type: none"> • We are ok with this. • Some licensees have deviated from the title "Non-failure emergency condition". The loaded terms "failure" and "emergency" do not have a place in the name of a condition that does not really involve a failure or an emergency. If using some other term to identify this condition, like "high flow communication protocol" is acceptable, please state so here.

			<ul style="list-style-type: none"> NIMS system used by EMAs is an escalating scale. This means that they have different systems to keep track of.
23	6-3.2.2 V B	Added example emergency message and introduced Incident Command System.	<p>6-3.2.2V B</p> <ul style="list-style-type: none"> Having the data sheet is a good idea. You could also correlate to the type of condition on the inundation maps. PP1 -Sending a company rep to EOC may be difficult, particularly if multiple EMAs are involved. NIMS National Incident Management System – FEMA has instituted a new system that the EMAs have to reorganize themselves by in order to get funding. FERC should consider how they will adapt their EAP format to the NIMs system.
31-39	6-3.2.2 VII	Revised section on inundation maps. Discussed map preparation, content, updates, populations at risk, and coordination. Included two sample maps.	<p>6-3.2.2 VII</p> <ul style="list-style-type: none"> It makes sense to get EMA input on the map content. This could include using local road and place names. It does not make sense to tailor a map to a particular EMA. It may not make sense to identify refuge centers on the maps because these locations may change. We support having this as a recommendation, rather than a requirement. <p>Page 34</p> <ul style="list-style-type: none"> Table is confusing. The incremental rise does not mean anything to EMA guys. They think about the normal river level. <p>Sample Map 2</p> <ul style="list-style-type: none"> Shelters shown (this is an EMA responsibility) and evacuation routes are shown. The EMAs should set the evacuation routes and the shelter locations. <p>Page 38 E. updating maps</p> <ul style="list-style-type: none"> Most licensees don't do the annual aerial survey. We want to supply the EMAs with the inundation zone maps and let them make up their evacuation lists from that. This makes the list more accurate as the zoning folks have the better handle on new construction. In some parts of the West the 5 year updates are not needed. <p>Page 39 G, Coordination (PP 4)</p> <ul style="list-style-type: none"> Hand drawing the new development (“streets, campgrounds, bridges, etc.”) on the inundation maps would not be practical, especially for licensees dealing with multiple dams and multiple counties. The EMAs are

			<p>already going to have much more detailed and accurate information regarding new development in their jurisdictions than the licensees.</p> <ul style="list-style-type: none"> • “If there is new development within the inundation zone, it will be necessary for the licensee to revise the inundation maps and re-issue them.” This statement, as written, is too vague. What constitutes ‘new development’ sufficient to require a re-issue of the map(s)? At what frequency should the licensee perform a review of new development downstream? How soon thereafter should revised maps be re-issued? Incremental development of existing subdivisions, commercial centers, etc., in the inundation zone would not likely change the emergency responders’ plans, and it would be extremely burdensome if this is the level of detail that would be required.
40	6-3.2.2 App A	Revised section on dam break analyses to reference Engineering Guidelines Chapter 2.	
42	6-3.2.2 App B	Included public education in Training Plan.	<p>Page 42</p> <ul style="list-style-type: none"> • Education plan for downstream residents would be necessary. • Very few licensees have done this. There is the potential for some very negative results from this. • This could affect property values.
46-66	6-4.2	Revised detailed discussions on exercises. Provided orientation seminar requirements and possible discussion topics. Added methods for conducting tabletop exercises. Discussed scheduling functional exercises.	<p>6-2.2.2 and 6-4.2.1: Agency Coordination and Exercises: Annual Face to Face Orientation is a burdensome step and many agencies are either too busy or unwilling to commit the time to meet. We would recommend such a requirement in years during or prior to a tabletop or functional exercise.</p> <p>Page 50 C. PP2 It is not practical to do this 30 days prior to annual orientation if you have multiple dams and EMAs. D PP2 This is confusing.</p>

70	6-4.5	Deleted expenditures section on results from exercises.	
71-73	6-5	Added new section on ensuring effective EAPs.	
77	6-9	Added section on temporary construction emergency action plans.	
		Eliminated dam break parameters since they are found in Chapter 2 of the Engineering Guidelines.	
79	App. 6-A	Updated FEMA documents.	
88-91	App. 6-D	Provided requirements for submitting GIS inundation map information to the Commission.	<p>GIS Database. There is value in having a common underlying database on a transportable platform. It is most important that the licensees data be useful to the downstream agencies. However, GIS databases come in various forms. At this time this is only a suggestion, which is fine, but we would not want to have it become a requirement.</p> <p>We suggest that the requirement for black and white images of the inundation maps be dropped. The resulting maps will be of little value, as it will be very difficult to make out the various inundation zones without color.</p>