



Preventive Radiation & Nuclear Detection Policies and Procedures Manual

October 2016

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I. INTRODUCTION

A. Scope and Purpose

This manual acts as a companion document to the Bay Area PRND Strategy which was approved by the by the members of the PRND Bay Area Program (“PRND Members”). It provides policies and procedures for the Bay Area Preventive Rad/Nuc Detection (PRND) Program, a focus group within the CBRNE Working Group of the Bay Area UASI. This manual includes:

- Participation Requirements;
- Indemnification of jurisdictions;
- Equipment purchases and distribution;
- Training and Exercises; and
- Conflict Resolution

No manual can anticipate every circumstance or question about policy. The Bay Area PRND Program reserves the right to revise, supplement, or rescind any policy or portion of this manual from time to time as it deems appropriate. PRND Members will be notified of changes to the manual as they occur.

All participants are expected to read, understand, and comply with all the provisions of this manual, both in their specific direction and the spirit in which they were written.

B. Affected Parties

These policies and procedures will apply to all participating organizations and agencies within the 12 Bay Area UASI County footprint unless they are in conflict with specific provisions of existing labor agreements or with specific provisions of state or federal law. In such cases, the provisions of those agreements or laws should prevail for the employees covered under those agreements or laws.

II. BAY AREA UASI AND THE PRND PROGRAM

A. Bay Area UASI

The Bay Area Urban Areas Security Initiative (BA UASI) improves capacity to prevent, protect against, respond to, mitigate, and recover from terrorist incidents or related catastrophic events by providing planning, organization, training, equipment and exercises to the Bay Area UASI region. It enhances regional capability through regional collaboration and responsibly leverages funding to achieve optimal results with the dollars available. The Bay Area UASI also coordinates and administers risk management planning and regional strategy, as well as researches, learns from, and shares what works well and what does not to inform program/product development.

The Bay Area UASI's footprint is comprised of three major cities (Oakland, San Francisco, and San Jose); twelve counties (Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Monterey, San Benito, Santa Cruz, Solano, and Sonoma); and more than 100 incorporated cities. The primary source of funds comes from the Homeland Security Grant Program (UASI program) administered by the Department of Homeland Security.

Governed by Memoranda Of Understandings (MOU) between participant jurisdictions, the Bay Area UASI is managed through a multi-layered governance structure. At the top level is the Approval Authority, which is supported by Working Groups. The City and County of San Francisco serves as the fiscal agent for the Bay Area UASI.

Please see the website, www.bayareauasi.org for more information on the participants and functioning of the Bay Area UASI.

B. Bay Area UASI Management Team

The Bay Area UASI Management Team is responsible for implementing policy decisions of the Approval Authority, which includes the administration and management of regional projects that have been endorsed by the Approval Authority, and all other administrative and legislative responsibilities associated with running the UASI. In addition, the team is responsible for the liaison role between the City and County of San Francisco, which serves as the fiscal agent for grant funds, and the grantors and sub-recipients. The Management Team also serves as the point of contact for all inquiries and issues from regional stakeholders and may assist, schedule, and/or facilitate Approval Authority and stakeholder meetings.

The Management Team is comprised of two units, Project Management and Grants Management.

C. The PRND Focus Group and Committee Structure

Pursuant to the Bay Area UASI governance structure, the BA UASI General Manager oversees the Management Team, which consists of grant specialists and project managers. The Bay Area Preventive Radiological/Nuclear Detection (PRND) Program is comprised of a regional coalition of volunteer subject matter experts serving as a focus group within the BA UASI Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) regional working group.

A project manager from the Bay Area UASI Management Team oversees the CBRNE working group and provides regular reports about the group's activities. The PRND has established a committee structure to move the program forward in a coordinated fashion. This committee structure and its relationship to the BA UASI are depicted in Figure 1 below.

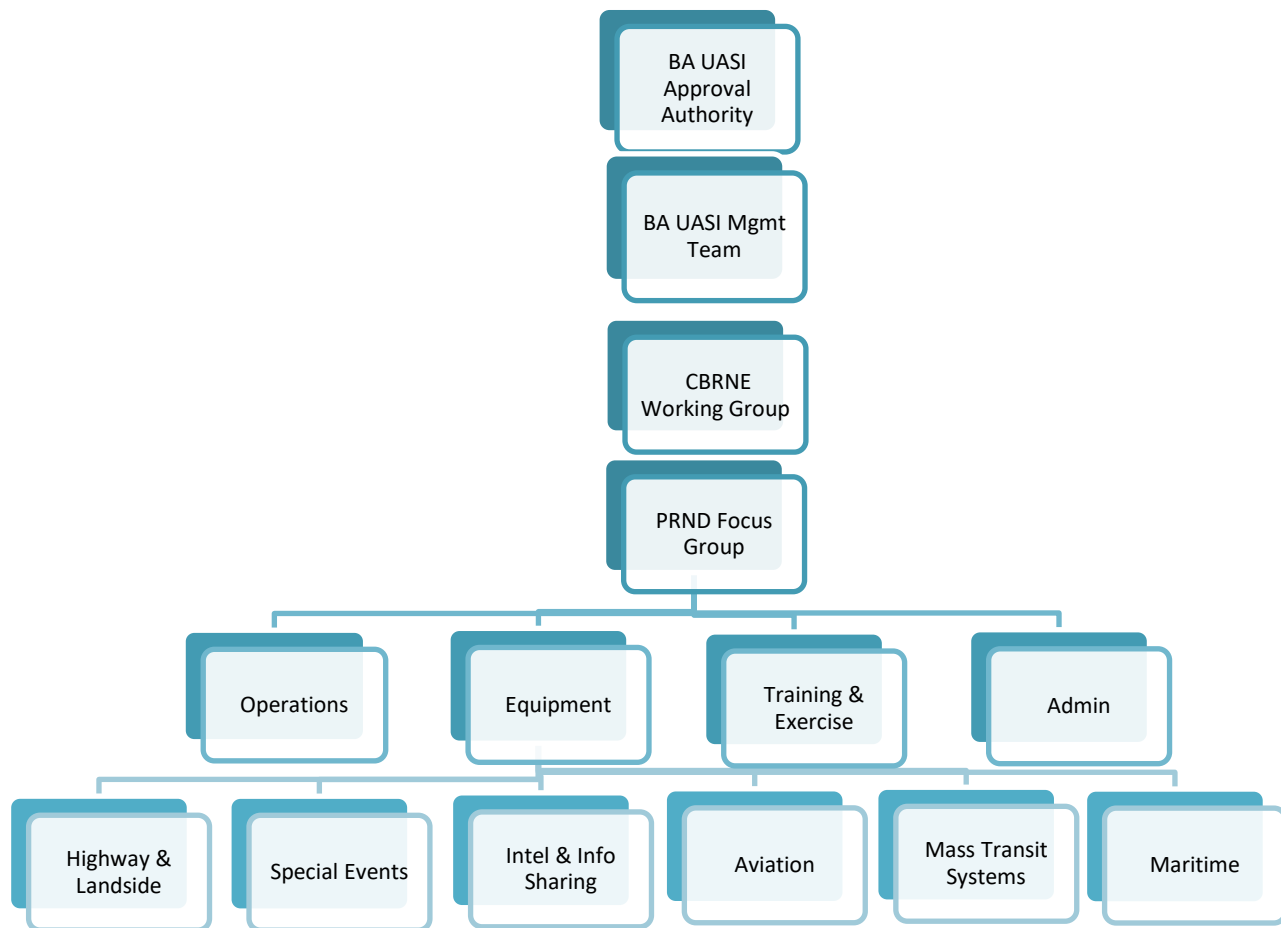


Figure 1: PRND Focus Group and its relationship within the BA UASI Structure

III. PRND DOCUMENTS

A. Guidance Documents and Plans

The BA PRND Focus Group has developed several guidance documents, including a Regional Program Strategy, a Concept of Operations (CONOPs), Regional Equipment Guidelines, and a template for Standard Operating Procedures (SOP). An Operations Plan (OPlan) as described below is in the development phase. These are to be used as guidance documents for the group.

The adopted Bay Area PRND Strategy, Land and Maritime Concepts of Operations, Information Sharing Plan, and SOPs will ensure that all partners are aligned with the mission and goals of the PRND Focus Group and coordinate their activities with other regional, state, and federal PRND stakeholders. The process will also allow each agency the latitude to accommodate local agency implementation needs.

Regional Program Strategy:

The concept of the PRND program is to have a protection strategy, resourced with the capability to perform intelligence, threat and risk driven public safety interdiction and surveillance and detection throughout the Bay Area. The PRND Program will provide a regional reporting mechanism that will allow Bay Area partners to share radiological data. This data will help identify a metric to inform resource deployment decisions and reduce the risk of radiation exposure to first responders and the public.

Concept of Operations:

The BA PRND Interior CONOPs and the Maritime CONOPs documents include a glossary of Bay Area PRND terms and definitions; defines operational modes; establishes a common alarm adjudication process; clarifies federal, state, regional and local jurisdictional authorities’ roles and responsibilities.

Equipment Capabilities and Procurement Guidelines:

The BA UASI PRND Equipment Capabilities and Procurement Guidelines provides equipment capability considerations, priorities, guidelines, and technical references to aid Bay Area agencies in their technical, purchase, distribution, and maintenance guidance that will support implementation of consistent region-wide capabilities.

Standard Operating Procedures:

A template of Standard Operating Procedures (SOP) has been developed to ensure consistency and structure to partner agencies.

Operations Plan:

An Operations Plan (OPLAN) provides guidance on operational activities, detection strategies, and tasks and acts as a foundation for further development of detailed agency-specific operations, protocols and procedures and their alignment with BA PRND policies and procedures. It also illustrates ways in which partner agencies can most effectively coordinate their detection and interdiction actions within the region.

IV. THE PRND PROGRAM

A. Securing the Cities Grant Program

The Bay Area UASI, on behalf of the PRND Program, is actively seeking funding from various funding sources, including the Securing the Cities (STC) Grant Program. The STC grant program specifically seeks to reduce the risk of a successful deployment of a radiological or nuclear weapon against major metropolitan areas in the United States. The program assists state and local partner agencies and requires a regional approach in the building of capabilities to detect, analyze, and report nuclear and other radioactive materials.

B. Principal Partners within the PRND organization

The application for the STC grant program requires a lead agency (applicant) and the identification of up to 11 principal partner agencies, which may include local, interstate, and state agencies. These 12 agencies must be clearly identified and requires the assignment of personnel to support this program **“of sufficient rank and stature to be able to make decisions for their organizations”**.

The San Francisco Department of Emergency Management, as fiscal agent for all homeland security grant funds, has agreed to act as the lead agency for the STC application. The other principal partner entities, as described below, have been nominated based on their unique roles and responsibilities within the region, either law enforcement, fire/hazmat, or health. These principal partner agencies may be changed should the PRND focus group wish to nominate other agencies that they deem more appropriate to fulfill the grant’s criteria and which are willing to accept the responsibilities described in the grant. However, the number of principal partner agencies may not exceed 11.

Law enforcement agencies are primarily responsible for the local radiological/nuclear detection mission in the San Francisco Bay Area and will have the most representation in the list of principal partners. Their duties include the performance of primary screening, secondary screening and technical reachback. Primary screening is typically performed as part of regular patrol duties during the Steady State Mission. It is the goal of the PRND Program to have Explosive Ordnance Disposal (EOD) teams perform secondary screening and technical reachback when certain alarm criteria are encountered.

In those instances when a law enforcement agency does not have secondary screening and technical reachback capability, or if they are unavailable, local fire department hazardous materials teams will be utilized. Therefore, fire departments will be the next most represented principal partners. Fire department hazardous materials team personnel may also be utilized in the formation of Joint Hazard Assessment Teams (JHAT) as part of an Enhanced Steady State or Radiological/Nuclear Search Mission. In the Enhanced Steady State mission posture, JHAT teams, comprised of law enforcement, hazardous materials and explosive ordnance personnel, provide just-in-time discovery, analysis and mitigation of possible CBRNE threats to prevent disruption of large scale public events by terrorists. In the Radiological/Nuclear Search mission posture, JHATs, under the direction of the FBI, are used as a force multiplier when large areas or complex structures need to be searched in a timely manner.

The third represented type of principal partner agency is health departments which support the Bay Area PRND Program by acting as a liaison with the Radiologic Health Branch (RHB) within the Food, Drug, and Radiation Safety Division of the California Department of Public Health. These agencies will assist with the licensing of radioactive source materials used in PRND training courses and exercises, registration and certification of PRND equipment, investigation of radiation incidents, and surveillance of radioactive contamination in the environment.

Project leads, working groups, and project managers each have certain roles and responsibilities to ensure that projects are successfully completed. As seen in Figure 1 above, six sub-committees (commercial vehicles, special events, intelligence and information sharing, aviation, mass transit systems, and maritime) report to the three committees (Strategic Plan, equipment and capabilities, and training and exercise) that then report to the Focus Group. For each sub-committee, a project lead will be selected to work closely with the BA UASI Program Manager and act as a liaison to the rest of the focus group.

C. Principal Partner Activities

By working in a coordinated fashion consistent with the Bay Area PRND Strategy and Concept of Operations, the principal partners will undertake the following activities: assign personnel from each agency of sufficient rank and stature who are eligible to make decisions for their organizations at meetings, hold a meeting of the PRND Focus Group on a quarterly basis, provide the necessary resources to prepare meeting agendas, distribute and approve meeting minutes, use project management tools, adhere to regional primary screening, secondary screening, alarm adjudication and technical reachback protocols, implement a regional strategy for the deployment of PRND equipment based on the mission being performed, participate in approved PRND training courses and exercises, and participate in the exchange of sensitive law enforcement radiological/nuclear detection information as mutually agreed upon.

The BA UASI, a division of the San Francisco Department of Emergency Management, will continue to provide the necessary administrative infrastructure for the development of the regional PRND architecture needed to achieve the goals and objectives of the program. This infrastructure includes the organizational structure of the UASI itself; at the top of which is the Approval Authority, created to ensure that the interests of all twelve counties in the UASI region are represented. By utilizing various working groups comprised of fire, law enforcement, EMS, emergency management and public health professionals, the BA UASI ensures that the needs of the region are reviewed and prioritized. Lastly, the BA UASI's practice of maintaining decision-making by consensus has allowed for the development of regional agreements. The principal partners will agree to continue these practices within the PRND Focus Group to provide personnel to serve on the various committees and sub-committees within the group.

Health department principal partners will act as liaisons to the Radiological Health Branch of the California Department of Public Health on matters of licensing, regulatory compliance and investigations. Training 100% of radiological safety personnel in regulations governing the storage, transport, and use of radiological materials; the safe handling and disposal of radiological materials; and forensic requirements in support of investigations that may arise from the region's efforts to detect and interdict radiological and nuclear materials out of regulatory control will be part of their roles and responsibilities.

In order to ensure regional exercise and training needs remain consistent within the PRND program, principal partner agencies will work with the Bay Area UASI's Regional Exercise and

Training Program (BATEP). This nationally recognized model for the delivery of Department of Homeland Security (DHS) approved courses, currently provides training for over 15,000 users in both the public and private sectors. The BATEP is also responsible for the internationally acclaimed annual Urban Shield Exercise that is designed to provide objective assessments of the region's capabilities and identify areas for improvement. For the last four years, Urban Shield has also included a PRND scenario. The BATEP has the capacity to provide the necessary resources to train over 650 first responders in the performance of primary screening, secondary screening and technical reachback as well as hosting Homeland Security Exercise and Evaluation Program (HSEEP) compliant table top and functional PRND exercises.

D. List of Principal Partner agencies

The current eleven principal partner agencies described below are government entities, either City or County agencies within the FEMA-defined UASI region, or is an agency (state or special district) that supports the UASI region.

The eleven agencies are listed as follows:

Alameda County Sheriff's Office. The 1,000 member Alameda County Sheriff's Office provides law enforcement services to citizens in the unincorporated areas of the County and the cities that have contracted for police services. These sworn/field officers are responsible for law enforcement duties using patrol, specialized tactical teams, explosive ordnance disposal (EOD), and maritime units. The agency is also responsible for providing services to Oakland International Airport, numerous public arenas, stadiums, and the Alameda-Contra Costa Counties Transit Authority. It also acts as the law enforcement coordinator for Region II of the CA Mutual Aid system in the Bay Area and provides representation for all sub-partner law enforcement agencies in the region. It was selected to participate as a principal partner in order to strengthen airport, special event venue and transit detection capabilities of the region.

Alameda County Public Health Department. The Alameda County Public Health Department employs 500 field personnel and works with a variety of medical service providers, government entities, and community-based organizations to address health and safety issues impacting the community. This agency will serve as the lead radiation/health agency for the region, functioning as a liaison to the Radiologic Health Branch (RHB) within the Food, Drug, and Radiation Safety Division of the California Department of Public Health, assisting with the licensing of radioactive source materials used in PRND training courses and exercises, registering and certifying PRND equipment, investigating radiation incidents, and monitoring the surveillance of radioactive contamination in the environment. It was selected to participate as a principal partner in order to assure the region's compliance with all federal, state and local radiological regulations.

Bay Area Rapid Transit District (BART). Bay Area Rapid Transit (BART) is a special district with both a law enforcement and transit component. The 205 sworn/field personnel are responsible for providing law enforcement services to rail passengers on the fifth largest heavy rail rapid

transit service in the US. Trains travel through four of the 12 counties (Alameda, Contra Costa, San Francisco, and San Mateo) and service is expanding into Santa Clara County. It was selected to participate as a principal partner in order to add regional transit detection capabilities.

California Highway Patrol. The California Highway Patrol (CHP) provides traffic enforcement throughout California on the state's highway system. The region is crisscrossed by many of the state's highways that comprise this system. The Golden Gate Division of the agency has 1,278 sworn/field officers who are responsible for law enforcement through patrol, commercial inspection units, and aviation patrol. It was selected to participate as a principal partner in order to strengthen regional transit detection capabilities as well as commercial vehicle inspection and aviation detection capabilities.

Oakland Police Department. The Oakland Police Department provides law enforcement services to the citizens of Oakland with a 658 person force that utilizes patrol, specialized tactical units, and a maritime unit. It is also responsible for portions of the San Francisco Bay waterfront, the Port of Oakland, and Oakland Airport. It is also one of three core cities (along with San Francisco and San Jose) in the San Francisco Bay Urban Area (Urban Area). It was selected to participate as a principal partner in order to add detection capabilities at maritime and airport locations.

San Francisco Fire Department. The San Francisco Fire Department provides fire services to the City and County of San Francisco. There are 1,443 field personnel who handle fire suppression, Emergency Medical Services (EMS), HazMat, and Urban Search and Rescue duties. It is also responsible for providing maritime fire, rescue and EMS services along the waterfront of San Francisco Bay, the Port of San Francisco, and San Francisco Airport. It was selected to enhance the secondary screening and technical reachback capabilities in the region as well as support the formation of Joint Hazard Assessment Teams (JHAT) when required.

San Francisco Police Department. The San Francisco Police Department is the chief law enforcement entity within the City and County of San Francisco. 2,087 sworn/field officers in the department serve on patrol, specialized tactical units, explosive ordnance disposal (EOD), and maritime patrol. The department is also responsible for portions of the waterfront along San Francisco Bay, the Port of San Francisco, numerous public arenas, stadiums, and San Francisco Airport. They are also assigned to the Joint Terrorism Task Force (JTTF). San Francisco is one of three core cities (along with Oakland and San Jose) in the Urban Area. It was selected to participate as a principal partner in order to add to maritime and airport detection capabilities of the region.

San Jose Police Department. The San Jose Police Department is the chief law enforcement entity within the City of San Jose. There are 1,109 sworn/field officers in the department who are responsible for law enforcement through patrol, tactical units, and explosive ordnance disposal (EOD) teams. It is also responsible for San Jose International Airport, numerous public arenas, stadiums, passenger buses and light rail trains operated by the Santa Clara Transportation Authority. San Jose is one of three core cities (along with Oakland and San Francisco) in the

Urban Area. It was selected to participate as a principal partner in order to add to airport, large public venue and transit detection capabilities of the region.

San Mateo County Sheriff's Office. The San Mateo County Sheriff's Office provides law enforcement services to citizens who reside within the unincorporated areas of the County. It also serves as the lead law enforcement agency for the Bay Area's intelligence/fusion center (the Northern California Regional Intelligence Center (NCRIC)) and the Joint Terrorism Task Force (JTTF). It is also responsible for portions of the waterfront of San Francisco Bay and works closely with the San Francisco Police Department to provide law enforcement services to San Francisco Airport (located in San Mateo County) and maritime issues along the Bay.

Santa Clara County Fire Department. The Santa Clara County Fire Department provides fire services to the unincorporated areas of the county and to cities that contract for their services. There are 259 firefighters who handle fire suppression, Emergency Medical Services (EMS), HazMat, and Urban Search and Rescue duties. The department is also the fire services coordinator for Region II of the CA Mutual Aid system in the Bay Area. This allows them to represent all sub-partner fire departments in the region. It was selected to enhance the secondary screening and technical reachback capabilities in the region as well as support the formation of Joint Hazard Assessment Teams (JHAT) when required.

Solano County Sheriff's Office. The Solano County Sheriff's Office is the lead law enforcement agency in Solano County. The Office has 120 sworn field officers who provide law enforcement services through patrol and specialized tactical units (including explosives detection, K-9, and maritime patrol) to citizens within the unincorporated areas of Solano County. It also provides these services to the numerous petrochemical facilities, the Port of Benicia, and to commercial vessel traffic operating between the Bay Area and the Ports of Sacramento and Stockton. Solano County is also geographically located between two major highway bridges and a major rail commerce route. The County is also home to Travis Air Force Base, one of the largest such bases on the West Coast. Solano County was selected as a partner to strengthen land and maritime detection capabilities in the region.

Each of the principal partner personnel identified as a point of contact is of sufficient rank to make decisions for their organization. The PRND program will work with the principal partners to identify other supporting or sub-partner agencies that will play a crucial role in the development of the program and the regional strategy.

E. Sub-partner Agencies

There are a number of sub-partner agencies represented by the eleven principal partners. These agencies have representatives as part of land-based mutual aid or serve on the Neptune Coalition as part of the region's maritime mutual aid program and include:

California National Guard, 95th Civil Support Team.

California Department of Public Health- Radiation Health Branch (CDPH-RHB)
California Department of Fish and Game- Office of Spill Prevention and Response (OSPR)
California Office of Emergency Services (Cal OES)
Alameda County Fire Department
Alameda Police Department
City of Santa Clara Police Department
Contra Costa County Fire Protection District
Contra Costa Sheriff's Office
East Bay Parks Police
Half Moon Bay Harbormaster
Marin County Fire Department
Marin County Sheriff's Office
Port of Oakland
Port of San Francisco
Redwood City Police Department
Richmond Police Department
Sacramento Police Department
San Francisco Sheriff's Department
San Francisco International Airport
San Jose Fire Department
Santa Clara City Fire Department
Santa Clara County Sheriff's Office
San Rafael Police Department
Sausalito Police Department
Sonoma County Fire and Emergency Services Department
Sonoma County Sheriff's Office
Sunnyvale Department of Public Safety
Vallejo Police Department

F. Considerations in Selecting the Principal Partners

Three quarters of the principal partners have representation on the BA UASI Approval Authority through their City or County representative. The Approval Authority ultimately oversees all PRND work.

In addition, the following were considerations in selecting the most appropriate principal partner agencies:

- Capable of maximizing regional involvement and support for agencies not named as principal partners.
- Although not specifically a law enforcement program, many PRND responsibilities will fall to law enforcement agencies.
- Close collaboration with both fire and health agencies is key to a successful program.

- Maritime requirements are significant and thus it is important that several principal partners are Neptune Coalition members to provide better collaboration with the US Coast Guard and the Northern California Area Maritime Security Committee (AMSC).
- Membership in the California Mutual Aid System provides easier access to PRND resources.

Three other agencies not represented on the Approval Authority were also included as principal partners. Solano County, located within the BA UASI footprint, was added due to the location of petro-chemical facilities within its boundaries. The California Highway Patrol, as a state agency with responsibility for all highways and bridges within the region, was considered to be a way to link agencies from the twelve counties that were not named as principal partners and was considered to be vital to this program. Bay Area Rapid Transit (BART), as the transit agency with service to the most jurisdictions in the region, has agreed to represent all the transit agencies.

V. AGREEMENTS

A. Memoranda of Understanding

The Bay Area UASI generally uses Memoranda of Understanding (MOU) to memorialize agreements between partner agencies for both the distribution of funds as well as for the distribution of purchased equipment or for costs associated with the conduct of training or exercises in which agencies participate (as described in Section VI- Equipment, Training, and Exercise).

However, another document, a Letter of Commitment, will also be required from all principal partner agencies should the Bay Area receive Securing the Cities grant funds. This document will indicate their intention to participate in the implementation of a regional STC program, prior to the development of MOUs.

As a part of the terms of the STC grant, MOUs between the San Francisco Department of Emergency Management and each of the other 11 principal partners must be delivered within six months of receipt of the grant award. The information contained in the MOUs will cite the agency's willingness to work in a coordinated fashion, detail equipment transfers and reimbursements, indicate a willingness to exchange law enforcement sensitive nuclear detection information, and a willingness to share lessons learned from operational and training deployments.

Most principal partner agencies have already previously entered into MOUs with the Bay Area UASI in support of various homeland security grant programs. These MOUs are reviewed and approved by the San Francisco City Attorney's Office before sending to the agency for signature.

B. MOU Components

A typical MOU is divided into three (3) parts: a Recital which provides a narrative of the grant's

history and an introduction to the agreement; a series of Articles in boilerplate language that contain clauses defining the recipient's roles and responsibilities (including the performance period of the grant and the amount of funds awarded); and several Appendices in which the allocation of funds or services received are described for the individual agency, Grant Assurances, a form for reimbursement requests, and a Schedule for sub-recipients to itemize their reimbursement requests.

For MOUs between the San Francisco Department of Emergency Management and the eleven (11) principal partners, the Recital will provide the introduction to the grant; the Articles will include the terms and conditions, including specific requirements from the grant guidelines as well as requiring that the agency complies with adopted Bay Area STC policies and procedures; designation of an authorized representative(s); the requirement to work in a coordinated fashion with principal and sub-partners; the sharing of programmatic data and law enforcement sensitive nuclear detection information with other BA STC partners, stakeholders, and the DNDO; collaboration in sharing lessons learned from operational and training deployments; and the requirement not to seek reimbursement for any expenses incurred by it which is not strictly set forth in the grant budget. The Appendices will describe either the allocation of funds for equipment to be purchased or the transfer of equipment to the agency after purchase by the lead agency; the allocation for training and exercise funds as set forth in the region's multi-year training and exercise plan; and the requirement for the timely submission of required records and reports.

VI. EQUIPMENT, TRAINING, AND EXERCISE

A. Equipment Procurement and grant funds

To close some of the identified equipment gaps, funding for PRND efforts has been a combination of multiple grant streams and local agency investments. Urban Areas Security Initiative (UASI), Port Security Grant Program (PSGTP), Buffer Zone Protection Program (BZPP), and State Homeland Security Grant Program (SHSGP) funds were used to purchase PRND equipment. Most recently, the BA PRND program has taken advantage of surplus radiation and nuclear detection equipment as another means to close identified gaps. Repairs, maintenance and replacement of radiation and nuclear detection equipment are funded by local agencies.

Procurement includes hiring, purchasing of supplies, and soliciting for professional services. The Bay Area UASI Management Team has responsibility for oversight of procurement processes that utilize federal funds received by the Approval Authority. The Grants Management Unit of the Management Team ensures compliance with federal laws, regulations, executive orders, departmental policy, award terms and conditions, and state and local requirements.

When a jurisdiction is the sub-recipient of award funds, the sub-recipient is responsible for procurement processes and should use procurement procedures and regulations from that jurisdiction, provided these procurement procedures and regulations conform to applicable federal law and standards.

In cases when a project does not include sub-recipient funding, all procurement processes are the responsibility of the Bay Area UASI Project Manager, working in partnership with the Grants Management Unit. Such procurements are conducted per the policies and procedures of the City and Country of San Francisco as the Bay Area UASI fiscal agent.

B. Eligible Equipment and standardized procurement

It is the policy of the Bay Area PRND program to purchase standardized equipment consistently throughout the region as well as meeting eligibility requirements for the Securing the Cities grant program. The Equipment working group will meet to identify all potential equipment purchases and provide a list annually for review by the twelve principal partners. The principal partners will review this equipment list and make priority determinations for purchases. On a case by case basis, special equipment requests will be reviewed and considered by the twelve principal partners. The equipment purchased will be designed with the intent to meet or exceed the radiation detection requirements of the American National Standards Institute (ANSI) standard for each category. There are also special requirements for the purchase of Neutron Detection equipment due to the limited supply of 3He. Should the PRND determine that they wish to develop neutron detection capabilities, DNDO will be contacted. The following is a list of equipment and the ANSI standard that the PRND will prioritize and purchase:

Equipment Category	Standard
Alarming Personal Radiation Detectors (PRDs)	ANSI/IEEE N42.32
Portable Radiation Detection Instrumentation	ANSI/IEEE N42.33
Hand-held Instruments for the Detection & Identification of Radionuclides	ANSI/IEEE N42.34
Mobile and Transportable Radiation Monitors. While detection systems configured to fit into helicopters and maritime vessels are authorized, helicopters and maritime vessels are not an allowable expense	ANSI/IEEE N42.43
Spectroscopic Personal Radiation Detectors (SPRDs)	ANSI/IEEE N42.48
Alarming Electronic Personal Emergency Radiation Detectors	ANSI/IEEE N42.49A
Non-Alarming Personal Emergency Radiation Detectors	ANSI/IEEE N42.49B
Backpack-based Radiation Detection Systems	ANSI/IEEE N42.53
Equipment necessary to facilitate response protocols, information exchange, and situational awareness, including computers, network equipment, communication equipment and wiring	N/A
Sealed radiation sources for training. Sealed radiation sources for system calibration and/or function checks. Storage lockers, if necessary, to maintain physical security of sources	Various

Equipment associated with preventive nuclear detection system calibration or maintenance, excluding vehicle maintenance	N/A
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C. Procurement by sub-recipient jurisdictions

It is the intent of the PRND program to purchase standardized equipment consistently and distribute it to principal partner agencies whenever possible. However, in some instances sub-recipient jurisdictions will procure approved equipment. Sub-recipients should use their own procurement procedures, regulations, and best practices, provided these conform to applicable federal law and standards. Sub-recipients are required to provide the Management Team’s Grants Management Unit a copy of their procurement policies for review. The sub-recipient jurisdiction must also comply with all relevant guidelines laid out in this manual, including those in Section VI (Procurement), as well as meet the approval requirements listed in the next section. The BA UASI Management Team is available to support jurisdictions with best practices concerning vendor solicitation, selection, negotiation, and management.

In many cases sub-recipient jurisdictions may begin the vendor procurement process in advance of the finalization of the MOU. Such work can include doing market research and drafting the solicitation. In addition, some jurisdictions are able to post the solicitation as well as select a vendor and negotiate a contract. However, in no instances may a sub-recipient jurisdiction obligate the funds, incur costs, or submit a reimbursement request for work on a contract that is not consistent with the time period stated on an approved MOU document.

D. Distribution of Procured Equipment

In cases where a project does not include sub-recipient jurisdiction funding, all procurement processes are the responsibility of the Bay Area UASI Management Team Project Manager, working in partnership with the Grants Management Unit. Such procurement should be conducted per the policies and procedures of the City and Country of San Francisco as the Bay Area UASI fiscal agent.

The distribution of equipment purchased through the Bay Area UASI will be determined by a risk-threat method and through a vote of the 12 principal partners.

E. Training and Exercises

Training

The BA UASI Regional Training and Exercise Program (BATEP) will be responsible for working collaboratively with the PRND Focus Group to review and approve eligible training course requests. Allowable training-related costs include the establishment, support, conduct, and attendance of

training specifically identified by Federal agencies (e.g., DHS, HHS, DOT, DNDO). Should the Bay Area receive an STC award, funds will be allocated to the regional Training and Exercise Program to utilize funds on behalf of the PRND.

Allowable STC training costs include:

- Conferences or workshops to develop training plans
- Contracts for delivery of approved courses
- Backfill or overtime costs for attending or instructing approved courses
- Travel/per diem to attend or instruct approved courses
- Supplies necessary to deliver approved courses
- Other training courses or activities with prior approval of DHS

The training courses described below are eligible under the UASI grant and are also allowable under the STC Grant. In addition, vendors of equipment may offer familiarization seminars on the operation, calibration, and maintenance of their equipment. These familiarization classes are also eligible when obtained from the same vendor from which the equipment was purchased. The PRND Focus Group will work with the Bay Area RTEP to develop a plan for prioritizing class offerings and the number of students from each jurisdiction who will attend the classes.

List of STC Grant eligible courses:

- AWR 140 WMD Rad/Nuc Awareness
- AWR 140-1 WMD Rad/Nuc Awareness Train the Trainer (TTT)
- PER 243 WMD Rad/Nuc Personal Radiation Detector (PRD)
- PER 243-01 WMD Rad/Nuc Personal Radiation Detector (PRD) Train the Trainer (TTT)
- PER 245 Secondary Screener (RIID)
- PER 246 Primary Screener: Backpack Basic Course
- HSEEP Exercise Training
- DHS-013-PREV - Primary Screening: PRD Basic Operator
- DHS-014-PREV - Primary Screening: Backpack
- DHS-012-PREV - Primary Screening: Mobile Detection System
- DHS-015-PREV - Secondary Screening: RIID
- DNDO-Sponsored STC Operational Workshops (includes operational training classes)
- Courses necessary for the authorized transportation, storage, and use of sealed radiation sources, based on NRC or NRC Agreement State regulations
- Other Radiological/Nuclear Detection related courses approved on a case-by-case basis by the STC Program Manager

Exercise

The BATEP is also responsible for reviewing and approving Exercise requests. Gaps identified by PRND exercises should be added to the Strategy, AAR/IP and/or addressed in the Bay Area training plans and cycle. Exercises must be managed and executed in accordance with the Bay Area's

Homeland Security Exercise and Evaluation Program (HSEEP). HSEEP Guidance for exercise design, development, conduct, evaluation, and improvement planning is located at <https://www.fema.gov/exercise>. The HSEEP Library provides sample exercise materials and templates. The PRND Focus Group should work with the BATEP to design and conduct exercises that will close identified gaps. Allowable exercise activities include, but are not limited to:

- Design, develop, conduct, and evaluate an exercise
- Exercise planning workshop
- Full- or part-time staff or contractors/consultants to design, develop, conduct and/or evaluate the exercise
- Overtime or backfill costs, including expenses for part-time and volunteer law enforcement or emergency response personnel participating an HSEEP compliant exercise
- Implementation of HSEEP
- Travel/per diem for the above exercise activities
- Supplies for the above exercise activities
- Other exercise activities with prior approval of DHS

F. Maintenance and Sustainment

The use of grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in FEMA Policy [FP 205-402-125-1](#) under all active and future grant awards, unless otherwise noted. With the exception of maintenance plans purchased incidental to the original purchase of the equipment, the period covered by maintenance or warranty plan must not exceed the period of performance of the specific grant funds used to purchase the plan or warranty. In cases where equipment is no longer covered by a maintenance agreement, jurisdictions will be responsible for maintaining their equipment in good working order.

Grant funds are intended to support projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to meet this objective, the policy set forth in GPD's IB 379 (Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding) allows for the expansion of eligible maintenance and sustainment costs which must be in 1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the Goal, and (4) shareable through the Emergency Management Assistance Compact. Additionally, eligible costs must also be in support of equipment, training, and critical resources that have previously been purchased with either Federal grant or any other source of funding other than DHS/FEMA preparedness grant program dollars.

G. Licensing Requirements and other Legal Considerations

At the federal level, the United States Nuclear Regulatory Commission is responsible for materials safety oversight and materials licensing for a variety of purposes. At the state level, the California Department of Public Health is responsible for the licensing and regulation of radioactive sources and the PRND will work closely with this agency.

Please see the Standard Operating Procedures or the Operational Plan for legal requirements pertaining to alarm adjudication or other rules and regulations.

VII. OTHER REQUIREMENTS

A. Regional Distribution of Standardized Equipment

In order to ensure the effective detection and prevention of the introduction of illicit radiological/nuclear threat material into the Bay Area, it is the policy of the PRND Focus group to ensure that standardized equipment is purchased and regionally distributed. Uniformity of radiation detection equipment fosters interoperability, efficient training, streamlined data sharing and communication, and more effective collective regional result integration.

Common data transmission and sharing is critical to a coordinated Bay Area PRND program as it allows for greater situational awareness and rapid adjudication of alarms through remote data analysis (if needed). In addition, time spent resolving alarms caused by natural background variations can be reduced through a collective assessment of nominal environmental levels; this also supports rapid identification of deviations from nominal levels. Finally, automated data sharing would greatly aid first responders in the aftermath of a radiological/nuclear event as near-real time radiological data provides situational awareness and can mitigate the dangers to first responders.

B. Equipment Inventory and Deployment

Equipment Inventory

Each jurisdiction will be responsible for conducting an annual inventory of all PRND equipment and submitted to the 12 principal partners. It will be the policy of the PRND program to also develop and maintain a cache of equipment to be made available for use by partner or sub-partner agencies. Such cache will be stored at an agency designated by the twelve principal partners.

Deployment

Preventive radiation detection equipment will be deployed on a regular basis whenever possible and not be used solely for special events, or as a result of threat based intelligence. Deploying equipment on a regular basis will allow operators to become proficient in the functions of the

instruments and the techniques necessary to properly utilize them. There is no substitute for actual field use to hone detection skills and techniques. This will also make the interdiction and prevention effort an everyday part of the operators' work duties and increase the deterrent effect of the program. Carrying a Personal Radiation Detector (PRD) increases the passive detection capability in each area it is deployed without dramatically increasing the demands placed upon the wearer. Generally, the instrument must only be addressed when it alarms. The more instruments present in the field on a daily basis, the greater the regional capability to detect and deter an attack.

Initial equipment assignments may include members of special operations commands including members of hazmat or bomb squads, special weapons and tactics teams, motor carrier safety/commercial vehicle inspection personnel, arson squads and canine explosives detection handlers due to the possibility that the unique skills possessed by these officers will be required during an interdiction effort or special event depending on agency considerations. Agencies should distribute equipment to personnel who could be mobilized, or surged to respond, in an organized and coordinated manner to regional threats. Many police agencies utilize mobile field forces or task forces that are trained to work together. Consideration should be given to advancing the training and equipment for these personnel to respond in a coordinated fashion to regional threats. Additional considerations should be given to providing training in response to incidents involving explosive materials, hazardous materials and suicide attacks to personnel who would participate in a PRND surge mobilization.

C. Agency coordination

Agencies should coordinate their local efforts with other first responder agencies that possess radiological detection equipment. This coordination should include procedures and training as to how to respond to alarms encountered by other first responders (non-law enforcement) in the course of their duties. Agencies may wish to establish a process/procedure to borrow detection equipment from other first response agencies or identify how capabilities will be augmented through cooperative efforts. Each agency should be aware of how to obtain secondary screening support, either from within their organization or from a designated regional partner agency.

Local plans should include a procedure to maintain calibration on all radiological detection equipment, as recommended by the manufacturer. Calibrations, when necessary, should be maintained in such a way that evidence obtained subsequent to an alarm from an instrument would be admissible in a court. If calibration cannot be maintained on a local level, a regional calibration capability should be developed and utilized. Local plans may also include significant security partners in high value target areas such as downtown or malls.

VIII. Conflict Resolution

A. Steps to resolve disputes

Participants in the Bay Area PRND program have worked collaboratively together for a number of years. Occasions may occur, however, when differences of opinion lead to unresolvable issues. If that happens, the PRND Focus Group will first attempt to resolve it informally through the BA UASI CBRNE Program Manager. If this is not successful, the matter will be forwarded to the CBRNE Working Group for action. If this still does not resolve the issue, the Focus Group will request a meeting with the BA UASI General Manager who will act as an arbiter between the parties. Should a party wish to appeal the arbiter's decision, as a last option, the issue will be calendared on the Approval Authority meeting agenda for review. As per the Multi-Year Master MOU, the purpose of the Approval Authority is to provide effective direction and governance of all grant programs. At that point, they will make the final ruling on any and all disputes involving the PRND Program.

The principal partners have agreed to take the following steps in the dispute resolution process:

Step One: The principal partner's representative will notify the Program Manager via an interoffice memorandum that an unresolvable issue exists. The Program Manager will facilitate an informal meeting between the representatives to resolve the issue(s). On issues of a technical nature, a Radiation/Nuclear Subject Matter Expert will assist. Assistance from the Domestic Nuclear Detection Office may also be requested in the Program Manager's efforts to find a solution. If the principal partner is not satisfied with the results of this informal discussion, or such discussion is not appropriate under the circumstances, the next step will be taken.

Step Two: If the principal partner is not satisfied with the resolution proposed through the informal discussion with the Program Manager, they may submit a formal written complaint for review by the PRND Focus Group. To do so, the principal partner should prepare a request for the issue to be placed on the agenda of the next regular meeting of the PRND Focus Group for their review and action. Assistance from the DNDO may also be requested by the Focus Group to assist in their efforts to find a solution. If the principal partner is not satisfied with the results of the Focus Group's recommendation for resolution, or such discussion is not appropriate under the circumstances, the next step in the resolution process will be taken.

Step Three: If the principal partner is not satisfied with the review and action of the Focus Group, the issue will be referred to the BA UASI General Manager who will function as an arbiter between the principal partners and/or review the issue(s) and make a recommendation for resolution. Assistance from the DNDO may also be requested by the BA UASI General Manager in his/her efforts to find a solution. If the principal partner is not satisfied with the result of the BA UASI General Manager's arbitration, review or recommendation, or such discussion is not appropriate under the circumstances, the next step in the resolution process will be initiated.

Step Four: The purpose of the Approval Authority is to provide effective direction and governance

of all grant programs. Assistance from the DNDO may also be requested by the Approval Authority in its efforts to reach a solution. After careful consideration of all the issues, the Approval Authority will make a decision that is binding for all involved parties. The Approval Authority's decision will be posted on the BA UASI webpage under the regular meeting minutes section for the month in which the meeting occurred. In addition, a letter will be sent from the BA UASI General Manager to the notifying principal partner agency in which the decision of the Approval Authority is described.

It has been the BA UASI's practice to reach decisions through consensus. The benefit of this approach is the Bay Area recognizes the diversity of agencies and service levels in the region and has dealt with differing approaches in many efforts. Enablers of collaborative effort have been identified in other programs which has allowed for successfully overcoming barriers. Using the Operations Plan and the Strategic Plan as tools will ensure that all partners are aligned with the mission and goals of the PRND Program, while allowing latitude to accommodate local needs in terms of agency implementation. Given the common-felt need by the principal partners for the PRND effort in the Bay Area, a very positive relationship already exists, and will allow for a successful outcome of the program. Based on past experience, the need for the above described steps will be extremely limited.