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Management

Guide

VOLUME XY



Emergency Management Accreditation Program

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Department of Energy/ National Nuclear Security Administration Office of Emergency Management

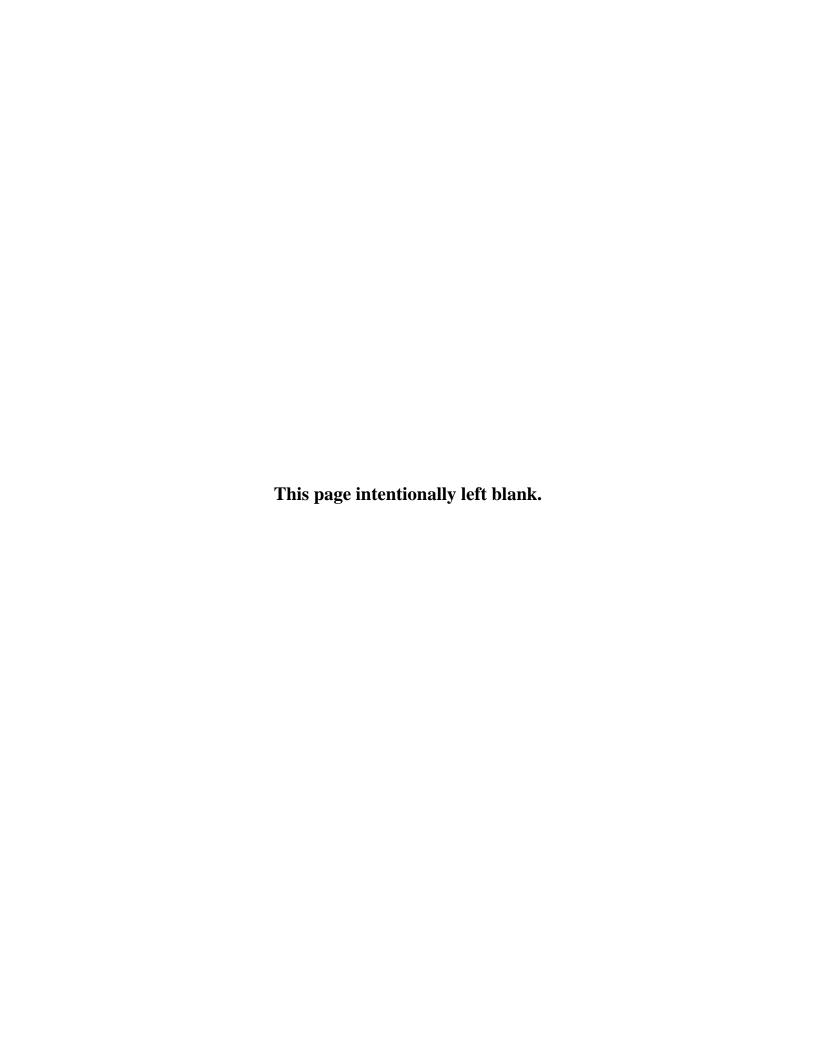


TABLE OF CONTENTS

	CONTENTS	
. EMEI	RGENCY MANAGEMENT ACCREDITATION (EMA) PROGRAM	1-1
1.1 INTR	ODUCTION	1-1
1.2 APPL	ICABILITY	1-1
1.3 PROC		
1.3.1.	Emergency Management Guide	1-1
1.3.2.		
1.3.3.	Emergency Management Accreditation Evaluation Guide	1-2
1.3.4.		
1.4 PROC		
1.4.1.	Associate Administrator for Emergency Operations (NA-40)	1-3
1.4.2.	EMA Program Administrator	1-3
1.4.3.	Performance Evaluation Program Administrator	1-3
1.4.4.	Peer Oversight Board	1-4
1.4.5.		
1.4.6.	Cognizant Secretarial Officers	1-5
1.4.7.		
1.4.8.		
1.4.9.		
1.4.10.		
	••	
	1 0	
	* *	
	±	
1.2 APPLICABILITY		
B 2 ORG	ANIZATION	B-1

		5 .4
	TINGS	
	PONSIBILITIES	
	ORDS	
	HORITY	
	PPENDIX C EMERGENCY MANAGEMENT ACCREDITATION PROC	ESS
	OWCHART C-1	
	REDITATION MATRIX	
	RGENCY MANAGEMENT ACCREDITATION EVALUATION GUIDE	
	UMENT DESCRIPTION	
3.1.1.	CRITERIA AND NUMBERING	
3.1.2.	DOCUMENT/RECORDS VS. OBSERVATIONS	
3.1.3.	TRAINING	
	ent 1: General Requirements	
3.2.1.	Description	
3.2.2.	Typical Compliance Problems	
3.2.3.	Instructions to Evaluator:	
	ent 2: Technical Planning Basis	
3.3.1.	Description	
3.3.2.	Typical Compliance Problems	
3.3.3.	Instructions to Evaluator:	
	ent: 3. Program Administration	
3.4.1.	Description	3-20
3.4.2.	Typical Compliance Problems	
3.4.3.	Instructions to Evaluator:	
	ent: 4. Emergency Training and Drills	
3.5.1.	Description	
3.5.2.	Typical Compliance Problems	
3.5.3.	Instructions to Evaluator:	
	ent: 5. Emergency Management Exercises	
3.6.1.	Description	
3.6.2.	Typical Compliance Problems	
3.6.3.	Instructions to Evaluator:	
	ent: 6. Readiness Assurance	
3.7.1.	Description	
3.7.2.	Typical Compliance Problems	
3.7.3.	Instructions to Evaluator:	
	ent: 7. Emergency Response Organization	
3.8.1.	Description	
3.8.2.	Typical Compliance Problems	
3.8.3.	Instructions to Evaluator:	
	ent: 8. Offsite Response Interfaces	
3.9.1.	Description	3-68

3.9.2	7 r · · · r	
3.9.3		
3.10 Ele	ement: 9. Emergency Facilities and Equipment	3-74
3.10.	1. Description	3-74
3.10.	2. Typical Compliance Problems	3-74
3.10.	3. Instructions to Evaluator:	3-74
3.11 Ele	ement 10: Categorization and Classification	3-79
3.11.	1. Description	3-79
3.11.	2. Typical Compliance Problems	3-79
3.11.	3. Instructions to Evaluator:	3-80
3.12 Ele	ement 11: Notification & Communications	3-94
3.12.	1. Description	3-94
3.12.	2. Typical Compliance Problems	3-94
3.12.	3. Instructions to Evaluator:	3-94
3.13 Ele	ement 12: Consequence Assessment	3-102
3.13.	1. Description	3-102
3.13.	2. Typical Compliance Problems	3-102
3.13.	3. Instructions to Evaluator:	3-102
3.14 Ele	ement 13: Protective Actions and Reentry	3-111
3.14.	1. Description	3-111
3.14.		
3.14.	7 = =	
3.15 Ele	ement 14: Emergency Medical Support	3-121
3.15.	1. Description	3-121
3.15.	2. Typical Compliance Problems	3-121
3.15.		
3.16 Ele	ement 15: Emergency Public Information (EPI)	3-126
3.16.		
3.16.	2. Typical Compliance Problems	3-126
3.16.		
3.17 Ele	ement 16: Termination and Recovery	3-135
3.17.		
3.17.	•	
3.17.	• • • • • • • • • • • • • • • • • • • •	
4. A(CCREDITATION ASSESSOR TRAINING PROGRAM	4-1

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1. EMERGENCY MANAGEMENT ACCREDITATION (EMA) PROGRAM

1.1 INTRODUCTION

The Department of Energy (DOE) Emergency Management Accreditation (EMA) Program evaluates and accredits site/facility emergency management programs that implement the comprehensive emergency management system required by DOE O 151.1C, Comprehensive Emergency Management System. Accreditation reduces risk by assuring the site and its stakeholders that the site emergency management program has been evaluated against recognized standards and requirements by third-party evaluators who apply those standards with uniformity and without bias. Accreditation signifies a solid, defensible program. The accreditation process focuses attention on areas that need improvement as well as recognition of excellence.

The EMA Program goes beyond the minimum DOE O 151.1C requirements for each program to conduct an annual self-assessment of the emergency management program. Although EMA Accreditation is strongly encouraged, the program is optional. Sites/facilities may or may not elect to pursue accreditation. Where EMA Accreditation is pursued, the processes described in this guidance will apply.

1.2 APPLICABILITY

The EMA Program is voluntary; sites/facilities are not obligated to seek accreditation. For those that seek accreditation, this Emergency Management Guide (EMG) applies to DOE field organizations and contractors.

The EMA Program is not directly funded by the Associate Administrator for Emergency Operations. The Associate Administrator for Emergency Operations will fund the costs associated with the responsibilities assigned to the Office of Emergency Operations in Section 4.0, below. However, sites/facilities that seek accreditation and otherwise participate in the program are responsible for paying for the costs of qualifying assessment team members and for the costs associated with the accreditation assessment of their program and the costs of maintaining accreditation once awarded.

1.3 PROGRAM COMPONENTS

The EMA Program consists of the following components –

1.3.1. Emergency Management Guide

This EMG describes the EMA Program, organizational responsibilities, and the accreditation process. It establishes procedures for administering the EMA Program and acquiring accreditation for site/facility emergency management programs.

1.3.2. Accreditation Matrix

The Accreditation Matrix, Chapter 2, is the application that each site completes and submits to start the accreditation process. The matrix is directly linked to the Contractor Requirements Document (Attachment 2) to DOE O 151.1C. The matrix includes columns for the site to record waivers, where in program documentation the requirement is addressed, and a site/facility statement regarding how implementation has been achieved. The final column will be used by the Accreditation Assessment Team to record its validation of site/facility compliance with the requirement.

1.3.3. Emergency Management Accreditation Evaluation Guide

The Accreditation Evaluation Guide, Chapter 3, is designed primarily for use by members of the Accreditation Assessment Team during the onsite Performance Evaluation Test and the Site Assessment. The main criteria in the Accreditation Evaluation Guide are the same as those in the Accreditation Matrix and the DOE O 151.1C Contractor Requirements Document. The subcriteria are mainly drawn from the Evaluation Criteria, Appendix D, to the Readiness Assurance EMG (DOE G 151.1-1A, Part 1, Volume III, Section 4.) The Accreditation Evaluation Guide also lists typical compliance problems drawn from the Office of Security and Safety Performance Assurance, Office of Independent Oversight Inspectors Guide, data from analysis of past DOE Complex exercise reports, and analyses from No-Notice Exercise Program. The Guide further includes recommendations to assessors regarding the types of documents and records to review as part of the accreditation assessment, positions to interview, and performance observations that should typically be made.

The secondary purpose of the Accreditation Evaluation Guide is to assist the facility/site in self-assessing its program, in preparation for completing and submitting the Accreditation Matrix.

1.3.4. Accreditation Assessor Training Program

This document, Chapter 4 [To Be Published], outlines the program of instruction used by the Performance Evaluation Program Administrator (PEPA) to train nominated accreditation assessment team members prior to assignment to accreditation assessment teams.

1.4 PROGRAM ADMINISTRATION

The EMA Program is administered by the Associate Administrator for Emergency Operations (NA-40) through the Office of Emergency Management (NA-41). The following organizations and individuals have supportive responsibilities: the EMA Administrator, the Performance Evaluation Program Administrator, the Peer Oversight Board, the Appeals Board, cognizant Secretarial Officers, DOE Cognizant Field Element

managers, and managers of DOE/National Nuclear Security Administration (NNSA) and DOE/NNSA contractor emergency management programs. The organization is shown graphically in Appendix A. The responsibilities of each are described below.

1.4.1. Associate Administrator for Emergency Operations (NA-40)

The Associate Administrator for Emergency Operations (NA-40):

- Establishes and communicates EMA policy; and
- Appoints the EMA Program Administrator.

1.4.2. EMA Program Administrator

The EMA Program Administrator:

- Develops policies, procedures, protocols, and standards necessary to maintain and improve the EMA Program;
- Appoints members of the Peer Oversight and Appeals Boards from the nominees provided by the Cognizant Secretarial Officers, Cognizant Field Elements, and DOE/NNSA and contractor emergency management programs. (Note: An individual must not serve on the Peer Oversight and Appeals Boards at the same time);
- Designates the Performance Evaluation Program Administrator(s);
- Assesses and makes the final determination on recommendations from the Peer Oversight and Appeals Boards and forward decisions and accreditation certificates to applicable DOE/NNSA field organizations and DOE/NNSA and DOE/NNSA contractor programs;
- Assesses and acts on requests for exception and technical equivalency;
- Forwards petitions for appeal to the Appeals Board;
- Periodically solicits field organization managers for nominees to participate on the Peer Oversight and Appeals Boards and as members of the accreditation assessment team;
- Issues "EMA Notices" regarding changes in emergency management requirements and/or criteria; and
- Maintains and improves the Performance Evaluation Program.

1.4.3. Performance Evaluation Program Administrator

The Performance Evaluation Program Administrator (PEPA) is assigned by the EMA Program administrator and is responsible for coordinating the accreditation process for site/facility emergency management programs. The PEPA:

• Establishes site assessment procedures and schedules site assessments;

- Trains accreditation assessment team members from the group of nominees provided by the Cognizant Secretarial Officers, Cognizant Field Elements, and DOE/NNSA and contractor emergency management programs; coordinates site visits by the accreditation assessment teams members; and evaluates the performance of the accreditation assessment team members;
- Reviews and evaluates the results of performance evaluation tests and site assessments in accordance with appropriate emergency management program criteria;
- Reports performance evaluation test and site assessment results to Cognizant Field Elements and managers of DOE/NNSA and DOE/NNSA contractor programs;
- Makes accreditation recommendations to the Peer Oversight Board based on performance testing and site assessment results;
- Reviews and evaluates requests for technical equivalence and amendment and make recommendations regarding such to the Peer Oversight Board; and
- Recommends changes for improving the quality and efficiency of the Performance Evaluation Program to the EMA Program Administrator.

1.4.4. Peer Oversight Board

The Peer Oversight Board consists of five members appointed by the EMA Program Administrator. Members of the Peer Oversight Board are drawn from DOE/NNSA employees and contractors participating in the program. Members of the Peer Oversight Board each serve a five-year term. The terms of members of the Peer Oversight Board will be staggered in order to provide continuity and ensure that all members of the Board are not replaced at the same time. The EMA Program Administrator may select a current member of the Peer Oversight Board to serve an additional term(s). Members of the Peer Oversight Board select one member to serve, for a three-year period, as chairman. The Peer Oversight Board reviews recommendations made by the PEPA and advises the EMA Program Administrator regarding approval or denial of accreditation. (NOTE: A Peer Oversight Board member cannot evaluate and vote on any issue his or her employer has before the Peer Oversight Board).

The voting criteria and quorum for the Peer Oversight Board functions is by simple majority of at least three voting members.

The charter for the Peer Oversight Board is in Appendix B.

1.4.5. Appeals Board

The Appeals Board is established on an ad hoc basis and consists of five members who are not affiliated with a site making an appeal. Members of the Appeals Board are drawn from DOE/NNSA Federal staff. Members of the Appeals Board select one member to serve as chairman. The sole responsibility of the Appeals Board is to review appeals and recommend to the EMA Program Administrator the affirmation or reversal of decisions

concerning accreditation issues and the selection of site assessors. The quorum and voting criteria for EMA Appeals Board functions are by simple majority of the five members.

1.4.6. Cognizant Secretarial Officers

Cognizant Secretarial Officers:

- Ensure DOE/NNSA and DOE/NNSA contractor emergency management programs under their purview that seek accreditation are supported;
- Nominate candidates for membership on the Accreditation Assessment Team and as Lead Assessor; Peer Oversight Board; and Appeals Board; and
- Support upgrades to emergency management programs identified by the EMA as deficient.

1.4.7. DOE/NNSA Field Organization Managers

DOE/NNSA field organization managers:

- Ensure that DOE/NNSA and DOE/NNSA contractor emergency management programs under their purview that seek accreditation are supported;
- Nominate candidates for membership on the Accreditation Assessment Team and as Lead Assessor; Peer Oversight Board; and Appeals Board;
- Communicate information concerning accreditation to appropriate sites and facilities:
- Review applications for EMA accreditation, technical equivalence, or amendment and, if concurring, forward them to the PEPA;
- Review and, if concurring, submit petitions for an appeal or requests for exception to EMA to the EMA Program Administrator;
- Review remedial action plans and, if concurring, forward to the PEPA within 45 days; and
- Ensure implementation of plans to effect changes needed to mitigate deficiencies in emergency management programs.

1.4.8. Managers of DOE/NNSA and DOE/NNSA Contractor Emergency Management Programs

Managers of DOE/NNSA and DOE/NNSA contractor emergency management programs or their designated representatives seeking accreditation:

- Nominate candidates for membership on the Accreditation Assessment Team and Peer Oversight Board;
- Complete and submit an application for EMA accreditation and complete a performance evaluation test and a site assessment in accordance with scheduling

established by the Performance Evaluation Program, or submit a request for exception, amendment, technical equivalence, or a petition for an appeal to the appropriate field organization;

- Allow accreditation assessment team members to examine all aspects of the emergency management program including facilities, equipment, plans, procedures, records, reports, position descriptions, personnel qualifications, training documentation; exercise results; and lessons learned programs.
- Work with the PEPA to ensure that accreditation assessment team members have the appropriate clearances and ensure that team members are presumed to have a "need-to-know" and are granted access to classified information.
- Submit a remedial action plan to the appropriate field organization regarding reported deficiencies within 30 days of receipt of an accreditation team assessment report; the response must describe and provide an implementation schedule for appropriate changes to equipment, procedures, and/or personnel to achieve accreditation.
- Notify the PEPA of significant changes to site emergency management program scope (e.g., facility addition or closure), resources, or other major changes that could affect compliance with the accreditation criteria within 30 days of the change.
- Maintain records of complaints and findings from internal and external evaluations of emergency management and response.
- Perform self-assessment of emergency management program at least annually and make records available to EMA assessors.

1.4.9. Accreditation Assessment Teams

Peer review is a concept that is strongly encouraged in the EMA program and accreditation assessment teams will include emergency management professionals from other DOE/NNSA sites that have committed to support and participate in the EMA Program. Accreditation assessment team members are nominated by the Cognizant Secretarial Officers, Cognizant Field Elements, and DOE/NNSA and contractor emergency management programs.

The PEPA conducts a training program (see Section 3.4, above) to ensure that all accreditation assessment team members have the same understanding of accreditation assessment materials. The costs for qualifying assessors are borne by the parent organization. The costs associated with participation on program assessment teams are borne by the organization seeking accreditation.

The PEPA assigns accreditation assessment team members from the pool of trained nominees who are trained and pre-qualified to conduct site visits, evaluate performance in accordance with assigned program criteria, report on that performance, and support verification of corrective actions. Before assigning accreditation assessment team members, the PEPA reviews accreditation assessment team member past work experience to ensure their impartiality, that the accreditation assessment team member

does not have responsibility for any aspect of the program at the site/facility seeking accreditation.

The number of accreditation assessment team members assigned and the amount of time allotted for site assessment and evaluation of performance will be based on a number of factors. These include:

- Site size and number of workers:
- Complicated logistics;
- Complexity of processes or relatively high number of unique hazards; and
- Degree of self-sufficiency with regard to emergency response capabilities vs. dependence upon external emergency response resources.

EMA Program procedures include a framework for audit planning that includes guidelines on assessment time based on experience and the factors listed above.

1.4.10. Lead Assessor

Each team will include a Lead Assessor, drawn from DOE/NNSA Federal staff, who is responsible for:

- Preparing assessment plan;
- Representing the team in communications with the site;
- Organizing and direct team members;
- Leading the team to reach conclusions regarding a recommendations for accreditation;
- Preventing and resolving conflicts;
- Confirming sufficiency and appropriateness of evidence to support assessment team findings and conclusions;
- Preparing and complete the audit report; and
- Verifying corrective actions as requested by the PEPA.

1.4.11. Accreditation Assessment Team Members

Because the expertise and understanding of its assessors will strongly affect the credibility and success of the accreditation program, the EMA Program seeks to develop a pool of highly qualified emergency managers to handle this accreditation function on a rotating basis.

Nominees for accreditation assessment team membership must be knowledgeable concerning the applicable criteria as well as laws, regulations and other requirements relevant to the emergency management discipline and applicable to the site applying for accreditation. They should have knowledge and skills related to emergency management processes, terminology, principles and their application to enable the assessor to examine

emergency management systems and to generate appropriate findings and conclusions. Accreditation assessment team members should have completed an education sufficient to acquire the knowledge and skills related to technical areas assigned for evaluation. Additionally, they should have work experience that contributes to development of the knowledge and skills. This work experience should be in a technical, managerial or professional position involving the exercise of judgment, problem solving and communication with other managerial or professional personnel, peers, and interested parties. Accreditation assessment team members must also have training and experience in the conduct of audits, evaluations or assessments, and have no conflict of interest that may risk impartiality of the assessment process.

In that regard, assessor team members should have the following qualifications, at a minimum:

- Five years of experience in an emergency management position;
- Participated in at least one emergency operation, training or exercise event in the last calendar year;
- Knowledgeable and up-to-date about the DOE comprehensive emergency management system;
- Nominated by the Cognizant Secretarial Officers, Cognizant Field Elements, and DOE/NNSA and contractor emergency management programs; and
- Have no conflict of interest as regards any aspect of EMA Program that might prevent objective review and assessment of a candidate program. Must be able and willing to serve as a neutral observer.

Accreditation assessment team members assigned by the PEPA are responsible for:

- Preparing for audit by reviewing assigned documents and data in advance;
- Being familiar with application of assessment criteria for assigned emergency management program areas;
- Prioritizing and focus on matters of significance during assessment;
- Collecting information through effective interviewing, listening, observing and reviewing documents, records and data;
- Verifying accuracy of collected information;
- Supporting Lead Assessor in preparation of assessment reports;
- Maintaining confidentiality and security of information; and
- Communicating effectively.

1.5 ACCREDITATION PROCESS

The process for accreditation includes the following steps:

- 1. Application made by Site;
- 2. Approval of application by Cognizant Field Element;

- 3. Review of application by NA-40;
- 4. Scheduling of Assessment and selection of Lead Assessor and accreditation assessment team members (note: a Preliminary Assessment visit may be scheduled at Site request prior to full assessment);
- 5. Conduct of Preliminary Assessment Visit by Lead Assessor (optional);
- 6. Conduct of EMA Program Assessment;
- 7. Conduct of EMA Performance Evaluation Test Observation and Assessment;
- 8. Development of Assessment report and forwarding to PEPA;
- 9. Forwarding of assessment report to Site;
- 10. Completion of corrective actions by site (if applicable);
- 11. Peer Oversight Board review of report/recommendation and casting of ballots for accreditation decision;
- 12. Follow-up assessment visit (if applicable); and
- 13. Accreditation granted.

The accreditation process is shown graphically in Appendix C and detailed information associated with these steps is described below.

1.5.1. Application for Accreditation

Each application for EMA requires the completion of a written compliance matrix that identifies requirements, waivers, implementing documents, controls, performance metrics and compliance validations. This application should include requirements from other source documents in addition to DOE O 151.1C and the Emergency Management Guides. As applicable, the application should include requirements drawn from other DOE Orders, the Code of Federal Regulations, Oversight Agreements, DOE/NNSA supplemental directives, and state and local ordinances.

Applicants submit information in the Accreditation Matrix (Attachment XXX). Applications should be as descriptive as possible and detail the scope of the site's emergency management program to allow for dedication of appropriate resources and time for the assessment team. Applicants may also request a preliminary assessment visit in this application. Preliminary assessments are conducted by a Lead Assessor to help determine site readiness for the full EMA site assessment.

The EMA Program Administrator reviews each EMA application. Upon acceptance, the application is forwarded to the PEPA, who schedules the assessment (or preliminary assessment if requested) with the site. The PEPA also selects an accreditation assessment team, based on emergency management program experience and qualifications detailed in section 4.9 of this guidance. The names and credentials of selected accreditation assessment team members will be provided in advance to the site applicant. Documents concerning the site emergency management program will be provided in advance to the assessment team to support preparation for the site visit. The site program manager and Cognizant Field Element will be notified of the assessment team selection.

1.5.2. Site Assessment

Each site assessment will be a two-part process that includes an EMA program assessment and a performance evaluation test. These may be conducted in conjunction with each other during a single assessment team visit. Site assessments will begin with an opening meeting between the assessment team and management at the applicant site. During conduct of a site assessment visit for accreditation, assessment teams require access to documents, records, facilities and personnel as necessary to collect information, verify accuracy and make determinations concerning program compliance with requirements. At the conclusion of the on-site visit, the assessment team will present their findings during a closeout meeting with appropriate members of the site management team. The site will have the opportunity to ask questions about the team's findings. A written summary of each finding discussed will be left with management's authorized representative.

1.5.3. Program Assessment

The accreditation process requires each site to demonstrate that its emergency management program is established, documented and implemented in accordance with criteria based on requirements set forth in DOE O 151.1C and the Emergency Management Guide, as well as applicable requirements drawn from other DOE Orders, the Code of Federal Regulations, Oversight Agreements, DOE/NNSA supplemental directives, and state and local ordinances. The scope of the assessment will be based on the application for Emergency Management Accreditation submitted by the site and accepted by the EMA Program Administrator. The programmatic portion of the site assessment will be conducted by an approved assessment team and will include review of documents and records, interviews with site personnel involved in emergency management and response, interviews with stakeholders of the site emergency management program, and inspection of facilities and equipment. The purpose will be to ascertain compliance with applicable requirements and management commitment to continuing suitability, adequacy and effectiveness of the emergency management program. Information specific to the programmatic assessment of emergency management programs is detailed in the Accreditation Evaluation Guide

1.5.4. Performance Evaluation Test

Information specific to the performance evaluation testing of the emergency management program is detailed in the Accreditation Evaluation Guide. In general, the performance evaluation testing process uses an emergency management exercise to validate facility and site-level emergency response performance. This may be an exercise that is already scheduled to meet site annual requirements. The exercise must include response to a simulated, realistic emergency event(s)/condition(s) in a manner that replicates an integrated emergency response to an actual event as nearly as possible. The site is responsible for all aspects of planning, conducting, and evaluating the exercise.

The same team that performs program assessment will perform the performance evaluation test. The assessment team will evaluate exercise planning and preparation to ensure use by the site of an effective, structured approach that includes documentation of specific exercise objectives, scope, timeline, injects, controller instructions, and evaluation criteria for realistic scenarios. The exercise conduct, control, evaluation, and critique by the site will also be evaluated.

1.5.5. Reporting Assessment Results

The assessment team leader will prepare the findings of the assessment team with input from members of the assessment team. Each report will include, but is not limited to:

- Identification of the site applying for Emergency Management Accreditation;
- Statement of confidentiality that any proprietary information that was obtained during the accreditation assessment will not be disclosed;
- Objectives and scope of the assessment, including program and performance evaluation test portions;
- Criteria against which the assessment was conducted;
- Period covered by the assessment and dates of site assessment;
- Identification of assessment team members;
- Identification of site representatives participating in the assessment;
- Summary of the assessment process including any obstacles encountered; and
- Assessment findings.

Assessment findings may include the following categories:

Nonconformance: This refers to noncompliance with EMA criteria.

A nonconformance may be classified as Major or Minor.

A *Major Nonconformance* is a deviation from the program or response accreditation criteria that is significant enough to result in one or more elements of the Site's emergency management program to be seriously degraded from the requirements established in the Order and Guidance, with the potential for a lack of preparedness to respond to emergencies potentially affecting health, safety, and security.

A *Minor Nonconformance* is a deviation from criteria that requires correction to ensure effective preparedness to potential emergencies, but, in and of itself, is unlikely to represent a significant threat to health, safety, and security. Minor Nonconformances, when taken together, may indicate that a more significant threat may exist and may constitute a Major Nonconformance.

Concern: This finding is for any aspect of the program that is considered marginal with respect to compliance with EMA criteria. A concern does not require response from the applicant site and the presence of a Concern does not affect a program's initial accreditation, however, the EMA Program Administrator will track concerns reported. Any concern not remediated by a program's next accreditation cycle will automatically be elevated to a nonconformance, thereby delaying renewal of accreditation.

Observation: This finding is either a suggested improvement that the emergency management program may incorporate at its own discretion or the highlighting of a noteworthy practice. No written response is required.

The report will be reviewed by the PEPA and issued to the site applicant through the appropriate DOE/NNSA Field Organization Manager. If a site applicant is in disagreement with an assessment finding, it should be discussed with the PEPA for resolution. For each nonconformance reported, the applicant site must submit a corrective action plan through the appropriate Field Organization to the PEPA within 30 days of receipt of the accreditation team report. The applicant site should correct nonconformance within 60 days of receipt of the report. Corrective action will be verified by the PEPA by reviewing evidence submitted by the site. A major nonconformance may require a follow-up visit for verification of corrective action.

1.5.6. Process for Granting Accreditation

When a program's technical evaluation has been completed and all major and minor nonconformances have been verified as closed, the PEPA prepares a recommendation for the Peer Oversight Board. The Peer Oversight Board reviews the recommendation and will cast ballots for a majority decision to either grant or deny accreditation. A denial will be accompanied by a description of the reasons for denial.

1.5.7. Appeals

An emergency management program manager may petition the EMA Program Administrator to have denial of accreditation reviewed by the Appeals Board. A petition to appeal must explain the reason(s) for the appeal and must be submitted to the appropriate Field Organization for forwarding to the EMA Program Administrator.

1.5.8. Surveillance Visits

Each year, the Accredited Site must submit an updated Accreditation Matrix to the PEPA. This annual submission will monitor continued implementation of the accredited emergency management program.

In addition to the annual Accreditation Matrix submission, an accreditation assessment team may be assigned to make a monitoring visit at any time during an accreditation period. This may occur for cause or on a random basis. It may serve to verify reported changes to a facility or operation or to explore any possible reason for poor performance during performance evaluation testing. The scope of a visit may range from a spot check to a complete programmatic review.

1.5.9. EMA Renewal

Accreditation will be automatically renewed for an accredited site (unless there is cause for suspension or revocation) for three years. A complete re-accreditation assessment will be conducted at the end of the three-year period on a date specified in the Conditions of Accreditation.

Accreditation is automatically extended for a DOE Site exceeding the effective end date specified in the Conditions of Accreditation under one or more of the following conditions:

- The DOE Site application for re-accreditation was submitted to the PEPA at least 90 days prior to the effective end date;
- The DOE Site is engaged in the timely remediation of identified deficiencies; or
- The DOE Site has exceeded the effective end date through no fault of its own.

1.5.10. Accreditation Suspension

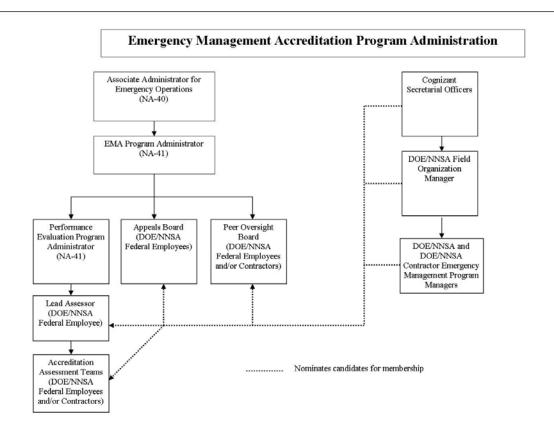
The EMA Program Administrator may suspend accreditation if the emergency management program is found to be out of compliance with the terms of its accreditation. The program will be notified of the reasons for and conditions of the suspension and actions to be taken by the program to have accreditation reinstated.

1.5.11. Revocation of Accreditation

The EMA Program Administrator may revoke a program's accreditation if the program is found to have violated the terms of its accreditation. The program will be notified of the reasons for the revocation. Possible reasons for revocation of accreditation may include:

- Major system deterioration;
- External complaints about system performance; or
- Failure to respond to corrective action issued by the accreditation program.

APPENDIX A EMERGENCY MANAGEMENT ACCREDITATION PROGRAM ADMINISTRATION



APPENDIX B PEER OVERSIGHT BOARD

B.1. PURPOSE

The Emergency Management Accreditation (EMA) Peer Oversight Board is established to advise the EMA Program Administrator with respect to technical issues, review of recommendations by the Performance Evaluation Program Administrator (PEPA) with respect to accreditation of site/facility emergency management programs and review of EMA assessment criteria. The primary purpose of the Board is to support the EMA Program Administrator to maintain long-term continuity of site emergency management programs. Another purpose is to ensure quality and consistency of EMA assessment criteria and site assessments.

B.2. ORGANIZATION

The EMA Program Administrator must appoint members of the Peer Oversight Board. Candidates are selected from nominations by the respective DOE field organizations, drawn from DOE/NNSA employees and contractors participating in the program. The Peer Oversight Board typically consists of five members who each serve a five-year term. The terms of members of the Peer Oversight Board will be staggered in order to provide continuity and ensure that all members of the Board are not replaced at the same time. Members of the Peer Oversight Board select one member to serve, for a three-year period, as chairman. Reappointment of members to subsequent terms may occur. Members are required to have expert knowledge of emergency management practices and requirements.

B.3. MEETINGS

The Peer Oversight Board normally meets twice a year to review accreditation documentation. The voting criteria and quorum for the Peer Oversight Board functions is by simple majority of at least three voting members.

B.4. RESPONSIBILITIES

The Peer Oversight Board:

- Reviews recommendations made by the PEPA and advise the EMA Program Administrator regarding approval or denial of site emergency management programs. A Peer Oversight Board member cannot evaluate and vote on any issue where there may be a conflict of interest;
- Reviews remedial action plans for mitigating concerns or deficiencies in emergency management programs identified by EMA site assessors; and
- Recommends appropriate changes to the EMA Program Administrator based on review of EMA documentation, site assessment criteria, and standards.

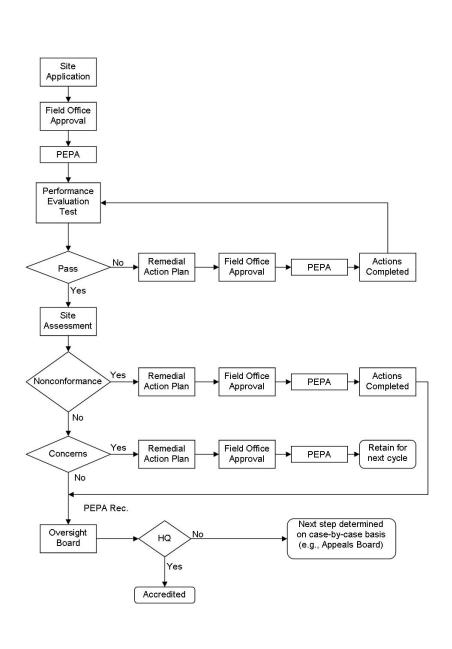
B.5. RECORDS

Records of Board meetings and recommendations for accreditation or denial of DOE site emergency management programs are maintained by the PEPA.

B.6. AUTHORITY

The Board is established as an advisory body. Therefore, decisions and recommendations made by the Board will not be binding on the EMA Program Administrator but will carry significant weight in the conduct of the EMA.

APPENDIX C EMERGENCY MANAGEMENT ACCREDITATION PROCESS FLOWCHART



2. ACCREDITATION MATRIX

1.	General Requirements	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
1.1	Overall		-			
1.1.1		There must be a Comprehensive Emergency Management System designed to—Minimize the consequences of all emergencies involving or affecting Departmental facilities, and activities (including transportation operations/activities);Protect the health and safety of all workers and the public from hazards associated with DOE/NNSA operations and those associated with decontamination, decommissioning, and				
		environmental restoration;Prevent damage to the environment; andPromote effective and efficient integration of all applicable policies, recommendations, and requirements, including Federal interagency emergency plans.				
1.2	Operational Emergency Base Program					
1.2.1		There must be an integrated Operational Emergency Base Program (see also DOE O 151.1C, Chapter III) for each facility and activity.				
1.2.2		The Operational Emergency Base Program must be based on a Hazards Survey.				
1.2.3		The Operational Emergency Base Program mustProvide the framework for response to serious events involving health and safety, the environment, safeguards, and security; andEnsure all requirements of DOE regulations and directives, regulations developed by other Federal agencies, and, if applicable, State and local requirements addressing emergency issues are seamlessly integrated, without duplication of emergency management effort.				
1.3	Operational Emergency Hazardous Material Program					
1.3.1		The contractor has a general duty to—Identify the hazards that may result from an unplanned release of hazardous materials;Strive to prevent unplanned releases of hazardous materials from DOE/NNSA facilities;Take any steps necessary to prevent releases; andUse feasible means to eliminate or materially reduce the hazard				
L ₂₀₄		to workers and the public.				

1.	General Requirements	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
1.3.2		The contractor executes this general duty by developing and documenting an integrated Operational Emergency Hazardous Material Program.				
1.3.3		The results of the Emergency Planning Hazards Assessment (EPHA) must be used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program.				
1.3.4		If the quantitative analysis indicates that all events would be classified as less than an Alert, the minimum program requirements must encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements.				
1.3.5		The site/facility contractor adjusts its Operational Emergency Hazardous Material Program to be commensurate with hazards that remain after a decontamination and decommission action is completed at each DOE closure site/facility.				
1.3.6		The site/facility contractor develops, implements, documents, and maintains an effective, integrated emergency management program that is commensurate with the hazards and that addresses the following program elements: program administration; training and drills; exercises; readiness assurance; emergency response organization; offsite response interfaces; emergency facilities and equipment; emergency categorization and classification; notifications and communications; consequence assessment; protective actions and reentry; emergency medical support; emergency public information; and termination and recovery.				

1.	General Requirements	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
1.3.7		The contractor at a site with multiple facilities may place facility-specific requirements in their emergency program on a site-/contractor-level organization (such as a single, site-wide public information program, rather than separate programs at each facility.) The contractor must gain approval, in writing, from the Cognizant Field Element before replacing the facility-specific requirements with site-/contractor-level requirements. Replacing facility-specific requirements with site- or contractor-specific requirements does not require an exemption.				
		The contractor placing requirements on a site-/contractor-level organization must meet the requirements of the Operational Emergency Hazardous Material Program if the site contains both Operational Emergency Base Program and Operational Emergency Hazardous Material Program facilities.				
		After gaining approval of the Cognizant Field Element Manager, the contractor must note those requirements placed on the site/contractor-level organization in the emergency plan at both the facility and site/contractor levels, as well as in the program description of the Emergency Readiness Assurance Plan (ERAP).				

2	Technical Planning Bases	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
2.1	Hazard Survey					
2.1.1		Each Hazards Survey must— Identify (e.g., in matrix or tabular form) the emergency conditions (e.g., fires, work place accidents, natural phenomena, etc.) that affect the facility; Describe the potential health, safety, or environmental impacts; Indicate the need for further analyses of hazardous materials in an EPHA; and Identify the planning and preparedness requirements that apply to each type of hazard.				
2.1.2		Hazards surveys must be updated every 3 years, and prior to significant changes to the site/facility or to hazardous material inventories.				
2.2	Hazardous Material Screening Process					
2.2.1		A Hazardous Material Screening Process must identify specific hazardous materials and quantities that, if released, could produce impacts consistent with the definition of an Operational Emergency. The potential release of these materials to the environment requires further analysis in an EPHA.				
2.2.2		All radioactive materials in a facility/activity must be subjected to a hazardous material screening process.				
2.2.3		All chemicals in a facility/activity with known or suspected toxic properties must be subjected to a hazardous material screening process.				
2.2.4		At a minimum, specific hazardous biological agents and toxins must include Federally regulated agents and toxins identified in lists published in Department of Health and Human Services (HHS) regulations [42 CFR 73] and Department of Agriculture (USDA) regulations [7 CFR 331 and 9 CFR 121], and require an EPHA and a Hazardous Material Program. Toxins listed in 42 CFR 73 and 9 CFR 121, must exceed the minimum quantities specified to be Federally regulated.				
2.2.5		The possibility that excluded materials could initiate, through fires or explosions, the release of other hazardous materials must be considered.				
2.2.6		If the screening process identifies at least one hazardous material requiring further analysis, the Hazards Survey must indicate that an EPHA is needed for that facility or activity.				

204

2	Technical Planning Bases	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
2.2.7		A description of the screening process and the results of its application to the hazardous materials in the facility/activity must be included in the Hazards Survey or incorporated by reference into supporting documentation. For facilities/activities requiring an EPHA, this documentation must be referenced or included in the EPHA. If the quantitative analysis indicates that all events would be classified as less than an Alert, an EPHA is not required. The results of the hazardous material screening process and the quantitative analysis may be incorporated directly into the Hazards Survey or may be incorporated by reference in the Hazards Survey.				
2.3	Emergency Planning Hazards Assessment					
2.3.1		In an EPHA, identify hazards and the potential consequences from unplanned releases of (or loss of control over) hazardous materials, using accepted assessment techniques.				
2.3.2		An accurate and timely method for tracking changes in operations, processes, or accident analyses that involve hazardous materials (e.g., introduction of new materials, new uses, significant changes in inventories, modification of material environments) must be established and maintained for each facility/activity. The method must allow sufficient time for emergency management personnel to review the EPHA and modify plans and procedures, as necessary.				
2.3.3		The EPHA must be reviewed at least every 3 years, and updated prior to significant changes to the site/facility or hazardous material inventories.				
2.3.4		The EPHA must include a determination of the size of the Emergency Planning Zone (EPZ). Assumptions, methodology, models, and evaluation techniques used in the EPHA must be documented.				
2.3.5		The Office of Secure Transportation (OST) must develop an EPHA for OST shipments to provide the technical planning basis for the OST Operational Emergency Hazardous Material Program.				
2.3.6		An EPHA must be developed for shipments that do not satisfy governing DOT regulations and specifications for commercial hazardous materials transport. However, if a shipment satisfies DOT regulations and specifications, then an EPHA is not required.				

3.	Program Administration	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
3.1	Operational Emergency Base and Operational Emergency Hazardous Material Programs				V	
3.1.1		Effective organizational management and administrative control of the facility emergency management program must be provided by establishing and maintaining authorities and resources necessary to plan, develop, implement, and maintain a viable, integrated, and coordinated comprehensive emergency management program.				
3.1.2		The contractor at all DOE/NNSA facilities must designate an individual to administer emergency management. This individual must develop and maintain the emergency plan, develop the ERAP and annual updates, develop and conduct training and exercise programs, coordinate assessment activities, develop related documentation, and coordinate emergency resources.				
3.1.3		The contractor at all DOE/NNSA facilities that are generating classified information or Unclassified Controlled Nuclear Information (UCNI), or are conducting classified or UCNI operations, must review all emergency preparedness documents, such as plans, procedures, scenarios, and assessments for classified information and UCNI. This review must be conducted by the appropriate official using current guidance. If the EPHAs do not contain classified information or UCNI, they must be reviewed by the emergency management program administrator to determine if they contain potentially exploitable information. EPHAs containing potentially exploitable information must be protected as Official Use Only under exemption 2 of the Freedom of Information Act.				
3.1.4		The contractor at all DOE/NNSA facilities must document the emergency management program in an emergency plan that also describes the provisions for response to an Operational Emergency.				
3.1.5		The contractor at all DOE/NNSA facilities must develop Emergency Plan Implementing Procedures to describe how emergency plans must be implemented.				

3.	Program	Criteria	Waivers/Applicability	Implementation	Statement of	Validation of
	Administration				Implementation	Compliance
					by Site/Facility	
3.1.6		The contractor at all DOE/NNSA facilities must establish a program to ensure that vital records, regardless of media, essential to the continued functioning or reconstitution of an organization during and after an emergency, are available, per 36 CFR 1236.				

4.	Training and Drills	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
4.1	Overall					
4.1.1		A comprehensive, coordinated, and documented program of training and drills must be an integral part of the emergency management program to ensure that preparedness activities for developing and maintaining program-specific emergency response capabilities are accomplished.				
4.2	Operational Emergency Base Program					
4.1.2		The contractor at all DOE/NNSA facilities must — Provide initial training and periodic drills to all workers who may be required to take protective actions (e.g., shelter-in-place; assembly, evacuation). This training is required when they are employed, when their expected actions change, or when the emergency plan changes. Provide refresher training annually to certified operators and supervisors and those workers who are likely to witness a hazardous material release and who are required to notify proper authorities of the release. Make available emergency-related information and training on site-specific conditions and hazards to offsite personnel who may be required to participate in response to an emergency at the DOE/NNSA site/facility.				
4.3	Operational Emergency Hazardous Material Program					
4.3.1	Toguin Toguin	The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish a coordinated program of training and drills for developing and/or maintaining specific emergency response capabilities as an integral part of the emergency management program. The program must apply to emergency response personnel and organizations that the site/facility expects to respond to onsite emergencies. Emergency-related information must be available to offsite response organizations. The program must consist of self-study/homework, training, and drills.				

4.	Training and Drills	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
4.4	Training					
4.4.1		Both initial training and annual refresher training must be provided for the instruction of and demonstration of proficiency by all personnel (i.e., primary and alternate) comprising the emergency response organization.				
4.5	Drills					
45.1		Drills must provide supervised, "hands-on" training for members of emergency response organizations.				

5.	Exercises	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
5.1	Overall					
5.1.1		A formal exercise program must validate all elements of an				
		emergency management program over a 5-year period.				
5.1.2		The exercise program must validate facility- and site-level				
		emergency management program elements by initiating				
		response to simulated, realistic emergency events/conditions in				
		a manner that, as nearly as possible, replicates an integrated				
		emergency response to an actual event.				
5.1.3		Planning and preparation must use an effective, structured				
		approach that includes documentation of specific objectives,				
		scope, timelines, injects, controller instructions, and evaluation criteria for realistic scenarios.				
5.1.4		Each exercise must be conducted, controlled, evaluated, and				
3.1.4		critiqued effectively and reliably.				
5.1.5		Lessons-learned must be developed, resulting in corrective				
3.1.3		actions and improvements.				
5.2	Operational Emergency	detions and improvements.				
3.2	Base Program					
5.2.1		At a minimum, conduct building evacuation exercises				
		consistent with Federal regulations [e.g., (41 CFR 102-74-				
		360)], local ordinances, and National Fire Protection				
		Association Standards. Exercises must be conducted at least				
		annually to ensure that employees are able to evacuate their				
		work area safely.				
5.2.2		Test communications systems with DOE Headquarters, the				
		Cognizant Field Element, and offsite agencies at least annually,				
		or as often as needed to ensure that communications systems				
	0 1 17	are operational.				
5.3	Operational Emergency Hazardous Material					
5.2.1	Program	TI () DOEANIGA O () LE				
5.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish a				
		formal exercise program to validate all elements of the				
		emergency management program over a 5-year period				
5.3.2		Each exercise must have specific objectives and must be fully				
۷.۶.۷		documented (e.g., in scenario packages that include objectives,				
		scope, timelines, injects, controller instructions, and evaluation				
		criteria).				

5.	Exercises	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
5.3.3		Exercises must be evaluated. A critique process, which includes gathering and documenting observations of the participants, must be established. Corrective action items identified as a result of the critique process must be				
5.3.4		incorporated into the emergency management program. Each DOE/NNSA facility must exercise its emergency response capability annually and include at least facility-level evaluation and critique. Evaluations of annual facility exercises by				
		Departmental entities (e.g., Cognizant Field Element, Program Secretarial Officer or Headquarters Office of Security and Safety Performance Assurance) must be performed periodically so that each facility has an external Departmental evaluation at least every 3 years.				
5.3.5		Site-level emergency response organization elements and resources must participate in a minimum of one exercise annually. This site exercise must be designed to test and demonstrate the site's integrated emergency response capability. For multiple-facility sites, the basis for the exercise must be rotated among facilities.				
5.3.6		Offsite response organizations must be invited to participate in site-wide exercises at least once every 3 years.				
5.3.7		Annual emergency response exercises must be supported by documentation that contains, but is not limited to, the exercise scope, its objectives and corresponding evaluation criteria, a narrative description of the scenario, timeline, and a list of participants. Documentation for site exercises must be approved by the Cognizant Field Element.				
5.3.8		Evaluation reports for facility and site exercises must be completed within 30 working days and submitted to the Cognizant Field Element, the Program Secretarial Officer(s), and the Director, Office of Emergency Operations.				
5.3.9		Corrective action plans must be completed within 30 working days of receipt of the final facility and site exercise evaluation report.				
5.3.10		Completion of corrective actions for facility and site exercises must include a verification and validation process, independent of those who performed the corrective action, that verifies that the corrective action has been put in place and that validates the corrective action has been effective in resolving the original finding. Corrective actions involving revision of procedures or training of personnel should be completed before the next exercise.				

204

5.	Exercises	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
5.3.11		Exercises of each of the Department's radiological emergency response assets must be conducted at least once every 3 years. These assets include the Accident Response Group (ARG), Nuclear Emergency Support Team (NEST), Federal Radiological Monitoring and Assessment Center (FRMAC), Aerial Measuring System (AMS), National Atmospheric Release Advisory Center (NARAC), Radiation Emergency Assistance Center/Training Site (REAC/TS), and Radiological Assistance Program (RAP).				

6.	Readiness Assurance	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
6.1	Operational Emergency Base and Operational Emergency Hazardous Material Programs					
6.1.1		The emergency management Readiness Assurance Program must establish a framework and associated mechanisms for assuring that emergency plans, implementing procedures, and resources are adequate by ensuring that they are sufficiently maintained, exercised, and evaluated (including assessment and appraisal) and that appropriate and timely improvements are made in response to needs identified through coordinated and comprehensive emergency planning, resource allocation, training and drills, exercises, and evaluations.				
6.1.2		The contractor at all DOE/NNSA facilities must implement a readiness assurance program consisting of evaluations, improvements and ERAPs.				
6.2	Evaluations	•				
6.2.1		Self-assessments. The contractor must conduct an annual self-assessment of their emergency management programs. Program and exercise evaluations (including appraisals and assessments) must be based on specific standards and criteria, issued by the Director, Office of Emergency Operations. Self-assessment results must be documented in the ERAP submitted to the Cognizant Field Element. Exercise Evaluations. See Exercise Criteria. Performance Indicators. Contractor facilities/sites must participate in a program of performance indicators (including performance measures and metrics) to capture and track objective data regarding the performance of emergency management programs in key functional areas. No-Notice Exercises. Contractor facilities/sites must participate in a program of No-Notice Exercises, conducted at the discretion of the Director, Office of Emergency Operations, to determine if the facility/site Emergency Response Organization (ERO) accomplishes selected objectives based on applicable plans, procedures, and/or other established requirements. Facility/site involvement is limited to providing trusted agents and responding when the exercise is conducted.				

204

6.	Readiness Assurance	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
6.3	Improvements				·	
6.3.1		Corrective Actions. These requirements supplement those in the CRD to DOE O 414.1A, Quality Assurance. Continuous improvement in the emergency management program results from implementation of corrective actions for findings (e.g., deficiencies, weaknesses) in all types of evaluations, including both internal and external evaluations. Corrective action plans must be developed within 30-working days of receipt of the final evaluation report. Corrective actions must be completed as soon as possible. Corrective actions addressing revision of procedures or training of personnel should be completed before the next annual self-assessment of the program. Completion of corrective actions must include a verification and validation process, independent of those who performed the corrective action, that verifies that the corrective action has been put in place, and validates that the corrective action has been effective in resolving the original finding. See Exercise Criteria for corrective actions related to findings from exercise evaluations. The readiness assurance program must include a system for incorporating and tracking lessons learned from training, drills, actual responses, and a site-wide lessons learned program. DOE/NNSA contractor-operated facilities must participate in the				
6.4	Emergency Readiness	DOE/NNSA Corporate Lessons Learned Program.				
	Assurance Plan.					
6.4.1		Facilities and offsite transportation activities must submit an ERAP to the Cognizant Field Element by September 30 of each year. In keeping with 31 U.S.C. 1115 and 1116, this report must identify what the goals were for the fiscal year that ended, coincident with the due date for this report (e.g., September 30), and the degree to which these goals were accomplished. This report must also identify the goals for the next fiscal year (e.g., which starts on October 1).				

7.	Emergency Response Organization	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
7.1	Overall					
7.1.1		An Emergency Response Organization (ERO), a structured organization with overall responsibility for initial and ongoing emergency response and mitigation, must be established and maintained for each facility/site. The ERO must establish effective control at the scene of an event/incident and integrate ERO activities with those of local agencies and organizations that provide onsite response services. An adequate number of experienced and trained personnel, including designated alternates, must be available on demand for timely and effective performance of ERO functions.				
7.2	Operational Emergency					
	Base Program					
7.2.1		The contractor at all DOE/NNSA facilities must assign an individual (e.g., building or facility manager or similar position) to manage and control all aspects of the site/facility response.				
7.3	Operational Emergency Hazardous Material Program					
7.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish and maintain an ERO for each site/facility with overall responsibility for the initial and ongoing response to and mitigation of an emergency. Control at the event/incident scene must be consistent with the National Incident Management System's Incident Command System, which integrates local agencies and organizations that provide onsite response services.				

8.	Offsite Response	Criteria	Waivers/Applicability	Implementation	Statement of	Validation of
	Interfaces				Implementation	Compliance
					by Site/Facility	
8.1	Operational					
	Emergency Base and					
	Operational					
	Emergency Hazardous					
	Material Programs					
8.1.1		Effective interfaces must be established and maintained to ensure				
		that emergency response activities are integrated and coordinated				
		with the Federal, Tribal, State, and local agencies and				
		organizations responsible for emergency response and protection				
		of the workers, public, and environment.				
8.1.2		The contractor at all DOE/NNSA facilities must coordinate with				
		State, Tribal, and local agencies and organizations responsible for				
		offsite emergency response (e.g., "911" emergencies) and for				
		protection of the health and safety of the public.				

9.	Emergency Facilities	Criteria	Waivers/Applicability	Implementation	Statement of	Validation of
	and Equipment				Implementation by Site/Facility	Compliance
9.1	Overall					
9.1.1		Facilities and equipment adequate to support emergency response must be available, operable, and maintained. At a minimum, facilities must include an adequate and viable command center. Equipment must include, but not be limited to, personnel protective equipment, detectors, and decontamination equipment.				
9.2	Operational Emergency Base Program					
9.2.1		The contractor at all DOE/NNSA facilities must provide facilities and equipment adequate to support emergency response, including the capability to notify employees of an emergency to facilitate the safe evacuation of employees from the work place, immediate work area, or both.				
9.3	Operational Emergency Hazardous Material Program					
9.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish and maintain facilities and equipment adequate to support emergency response A facility must be available for use as a command centerProvisions must be established for use of an alternate location if the primary command center is not availableAdequate personal protective equipment and other equipment and supplies must be available and operable to meet the needs determined by the results of the EPHA.				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
10.1	Overall					
10.1.1		Operational Emergencies are major unplanned or abnormal events or conditions that: involve or affect DOE/NNSA facilities and activities by causing or having the potential to cause serious health and safety or environmental impacts; require resources from outside the immediate/affected area or local event scene to supplement the initial response; and, require time-urgent notifications to initiate response activities at locations beyond the event scene. In general, to be considered an Operational Emergency, an event or condition involving the uncontrolled release of a hazardous material must: immediately threaten or endanger personnel who are in close proximity of the event; have the potential for dispersal beyond the immediate vicinity of the release in quantities that threaten the health and safety of onsite personnel or the public in collocated facilities, activities, and/or offsite; and have a potential rate of dispersal sufficient to require a time-urgent response to implement protective actions for workers and the public.				
10.1.2		In addition to being categorized as Operational Emergencies, events involving the actual or potential airborne release of (or loss of control over) hazardous materials from an onsite facility or activity also require prompt and accurate classification as an Alert, Site Area Emergency, or General Emergency, based on health effects parameters measured or estimated at specific receptor locations (e.g., facility and site boundaries) and compared with protective action criteria. Predetermined conservative onsite protective actions and offsite protective action recommendations must be associated with the classification of these Operational Emergencies (as an Alert, Site Area Emergency or General Emergency).				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
10.2	Operational Emergency Base					
10.2.1	Program	The contractor at all DOE/NNSA facilities must — Establish criteria for determining quickly if an event is an Operational Emergency. Declare an Operational Emergency when events occur that represent a significant degradation in the level of safety at a site/facility and that require time-urgent response efforts from outside the site/facility. These events do not require further classification (i.e., as Alert, Site Area Emergency, or General Emergency). Such events include the following.				
10.2.2		Emergency). Such events include the following. Health and Safety. The following events or conditions represent, cause, or have the potential to cause serious health and safety impacts to workers or members of the public. The discovery of radioactive or other hazardous material contamination from past DOE/NNSA operations that may have caused, is causing, or may reasonably be expected to cause uncontrolled personnel exposures exceeding protective action criteria. An offsite hazardous material event not associated with DOE/NNSA operations that is observed to have or is predicted to have an impact on a DOE/NNSA site, such that protective actions are required for onsite DOE/NNSA workers. An occurrence (e.g., earthquake, tornado, aircraft crash, fire, explosion) that causes or can reasonably be expected to cause significant structural damage to DOE/NNSA facilities, with confirmed or suspected personnel injury or death. Any facility evacuation in response to an actual occurrence that requires time-urgent response by specialist personnel, such as hazardous material responders or mutual aid groups not normally assigned to the affected facility. An unplanned nuclear criticality. Any mass casualty event.				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation	Validation of Compliance
					by Site/Facility	
10.2.3		Environment. The following events or conditions represent,				
		cause, or have the potential to cause serious detrimental effects on				
		the environment.				
		Any actual or potential release of hazardous material or				
		regulated pollutant to the environment, in a quantity greater				
		than 5 times the Reportable Quantity (RQ) specified for such				
		material in 40 CFR 302, that could result in significant				
		offsite consequences, such as major wildlife kills, wetland				
		degradation, aquifer contamination, or the need to secure				
		downstream water supply intakes.				
		Any release of greater than 1,000 gallons (24 barrels) of oil				
		to inland waters; greater than 10,000 gallons (238 barrels) of				
		oil to coastal waters; or a quantity of oil that could result in				
		significant off-site consequences (e.g., need to relocate				
		people, major wildlife kills, wet-land degradation, aquifer				
		contamination, need to secure downstream water supply				
		intakes, etc.) [Oil as defined by the Clean Water Act				
		(33 U.S.C. 1321) means any kind of oil and includes				
		petroleum.]				
10.2.4		Security and Safeguards. (Security incidents are also subject to				
		reporting in accordance with DOE O 471.4, Incidents of Security				
		Concern. Per this Order, foreign involvement in security				
		incidents must be reported to the Office of Counterintelligence.)				
		The following events or conditions represent, cause, or have the				
		potential to cause degradation of security or safeguards conditions				
		with actual or potential direct harm to people or the environment.				
		Actual unplanned detonation of an explosive device or a				
		credible threat of detonation resulting from the location of a				
		confirmed or suspicious explosive device.				
		An actual terrorist attack or sabotage event involving a				
		DOE/NNSA site/facility or operation.				
		Kidnapping or taking hostage(s) involving a DOE/NNSA				
		site/facility or operation.				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
10.2.5		Offsite DOE Transportation Activities. The following events or			•	
		conditions represent an actual or potential release of hazardous				
		materials from a DOE/NNSA shipment.				
		Any accident/incident involving an offsite DOE/NNSA				
		shipment containing hazardous materials that causes the				
		initial responders to initiate protective actions at locations				
		beyond the immediate/affected area.				
		Failures in safety systems threaten the integrity of a nuclear				
		weapon, component, or test device.				
		A transportation accident results in damage to a nuclear				
		explosive, nuclear explosive-like assembly, or Category I/II				
		quantity of Special Nuclear Materials.				
10.2.6		<u>Hazardous Biological Agent or Toxins</u> . The following events or				
		conditions involving the release of a hazardous biological agent or				
		toxin [identified in 42 CFR 73, 7 CFR 331 and 9 CFR 121]				
		represent major failure of safety systems, protocols, and/or				
		practices with the potential to have a serious impact on health and				
		safety of workers, collocated workers, emergency responders,				
		members of the public, or the environment:				
		Any actual or potential release of a hazardous biological				
		agent or toxin outside of the secondary barriers of the				
10.0.		biocontainment area.				
10.2.7		Categorize an event as an Operational Emergency as promptly as				
		possible, but no later than 15 minutes after event				
		recognition/identification/discovery.				
10.3	Operational					
	Emergency Hazardous					
10.2.1	Material Program	TO TOTAL OUT OF THE STATE OF TH				
10.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous				
		Material Program facilities must also establish procedures to				
		classify emergency events (as an Alert, Site Area Emergency,				
		General Emergency).				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
10.3.2		Hazardous material emergencies involving DOE/NNSA facilities must be classified Operational Emergencies as either an Alert, Site Area Emergency, or General Emergency, in order of increasing severity, when events occur that represent a specific threat to workers and the public due to the release or potential release of significant quantities of hazardous materials. Classification aids in the rapid communication of critical information and the initiation of appropriate time-urgent emergency response actions. Events, listed in paragraph 11a of the CRD, and in Criteria 10.4 through 10.8 of this matrix, that serve as initiating events for the release of hazardous materials must be classified under the provisions of paragraph 11b of the CRD				
10.3.3		Alert. An Alert must be declared when events are predicted, are in progress, or have occurred that result in one or more of the following. An actual or potential substantial degradation in the level of control over hazardous materials. The radiation dose from any release to the environment of radioactive material or a concentration in air of other hazardous material is expected to exceed either— a site-specific criterion corresponding to 10 percent of the applicable protective action criterion [see Base Order, paragraph 4a(14)] at or beyond the facility boundary; orthe applicable protective action criterion at or beyond 30 meters from the point of release to the environment. It is not expected that the applicable protective action criterion will be exceeded at or beyond the facility boundary. An actual or potential substantial degradation in the level of safety or security of a nuclear weapon, component, or test device that would not pose an immediate threat to workers or the public. An actual or potential substantial degradation in the level of safety or security of a facility or process that could, with further degradation, produce a Site Area Emergency or General Emergency.				

10.	Categorization and Classification	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
10.3.4		Site Area Emergency. A Site Area Emergency must be declared when events are predicted, in progress, or have occurred that result in one or more of the following situations. An actual or potential major failure of functions necessary for the protection of workers or the public. The radiation dose from any release of radioactive material or concentration in air from any release of other hazardous material is expected to exceed the applicable protective action criterion [see Base Order, paragraph 4a(14)] at or beyond the facility boundary. The protective action criterion is not expected to be exceeded at or beyond the site boundary. An actual or potential threat to the integrity of a nuclear weapon, component, or test device that may adversely impact the health and safety of workers in the immediate area, but not the public. Actual or potential major degradation in the level of safety or security of a facility or process that could, with further				
10.3.5		degradation, produce a General Emergency. General Emergency. A General Emergency must be declared when events are predicted, in progress, or have occurred that result in one or more of the following situations. Actual or imminent catastrophic reduction of facility safety or security systems with potential for the release of large quantities of hazardous materials to the environment. The radiation dose from any release of radioactive material or a concentration in air from any release of other hazardous material is expected to exceed the applicable protective action criterion [see Base Order, paragraph 4a(14)] at or beyond the site boundary. Actual or likely catastrophic failures in safety or security systems threatening the integrity of a nuclear weapon, component, or test device that may adversely impact the health and safety of workers and the public.				
10.3.6		Site/facility-specific Emergency Action Levels (EALs) must be developed for the spectrum of potential Operational Emergencies identified by the EPHA and must include protective actions corresponding to each EAL.				

11.	Notification and Communications	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
11.1	Operational Emergency Base and Operational Emergency Hazardous Material Programs					
11.1.1		Initial emergency notifications must be made promptly, accurately and effectively to workers and emergency response personnel/organizations, appropriate DOE/NNSA elements, and other Federal, Tribal, State, and local organizations and authorities. Accurate and timely follow-up notifications must be made when conditions change, when the emergency classification level (as an Alert, Site Area Emergency, General Emergency) is upgraded, or when the emergency is terminated. Continuous, effective, and accurate communication among response components and/or organizations must be reliably maintained throughout an Operational Emergency.				
11.1.2		The contractor at all DOE/NNSA facilities must — Provide prompt initial notification of workers, emergency response personnel, and response organizations, including DOE/NNSA elements and State, Tribal, and local organizations;Notify State and local officials and the Cognizant Field Element Emergency Operations Center (EOC) and Headquarters Operations Center within 15 minutes and all other organizations within 30 minutes of the declaration of an Alert, Site Area Emergency, or General Emergency;Notify the Cognizant Field Element EOC and Headquarters Operations Center within 30 minutes of the declaration of an Operational Emergency not requiring classification; andNotify local, State, and Tribal organizations within 30 minutes, or as established in mutual agreements, for declaration of an Operational Emergency not requiring classification				

11.	Notification and Communications	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
11.1.3		At a minimum, emergency notification to the Headquarters Operations Center must consist of a phone call providing as much information as is known at the time. The same information must be provided by e-mail or a fax, either immediately prior to or following the phone call. Information for initial notification includes as much as possible of the following: That an Operational Emergency has been declared and, if appropriate, the classification of the emergency; Description of the emergency, Date and time the emergency was discovered; The damage and casualties; Whether the emergency has stopped other facility/site operations or program activities; Protective actions taken and/or recommended; Notifications made; Weather conditions at the scene of the emergency or at the facility/site; and Contact information of the DOE or NNSA on-scene				
11.1.4		point-of-contact. Provide for continuing effective communication among response organizations throughout an emergency. Establish effective communications methods between event scene responders, emergency managers, and response facilities. Forward emergency status reports to the next-higher Emergency Management Team on a continuing basis until the emergency is terminated. Each activated Emergency Management Team must submit a final report on the emergency response to the Emergency Manager for submission to the Director, Office of Emergency Operations, following termination of emergency response, and in conjunction with the Final Occurrence Report (see DOE M 231.1-2). Review all reports and releases for classified or unclassified controlled information (e.g., Unclassified Controlled Nuclear Information) prior to being provided to personnel not authorized access to such information, entered into databases not authorized for such information, or transmitted using non-secure communications equipment.				

12.	Consequence Assessment	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
12.1	Overall					
12.1.1		Estimates of onsite and offsite consequences of actual or potential releases of hazardous materials must be computed and assessed correctly and in a timely manner throughout the emergency. Consequence assessments must be integrated with emergency classification and protective action decision-making; incorporated with facility and field indications and measurements; and coordinated with offsite agencies.				
12.2	Operational Emergency Hazardous Material Program					
12.2.1	1105.00.1	The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must establish provisions to assess the potential or actual onsite and offsite consequences of an emergency.				
12.2.2		Consequence assessments must— Be timely throughout the emergency; Be integrated with the emergency classification and protective action process; Incorporate monitoring of specific indicators and field measurements; and -Be coordinated with Federal, State, local, and Tribal organizations.				
12.2.3		If the facility has the potential for an Operational Emergency classified as a General Emergency, the facility/site must have connectivity to NARAC capabilities, and procedures to use the NARAC capability effectively as part of near real-time consequence assessment activities for the mode (primary, backup, corroborating) selected by the facility.				
12.2.4		If the facility has the potential for an Operational Emergency classified as a Site Area Emergency, the facility/site must have procedures in place to activate or request NARAC capabilities, and must be able to use those capabilities as part of near real-time consequence assessment activities.				

12.	Consequence Assessment	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
12.2.5		All DOE/NNSA facilities/sites that have access to NARAC or have procedures in place to activate or request NARAC capabilities must ensure that facility/site meteorological data and information on source terms for actual or potential releases of hazardous materials to the atmosphere are available or can be made available to NARAC in a timely manner to facilitate near real-time computations.				

13.	Protective Actions and Re-entry	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
13.1	Overall					
13.1.1		Protective actions must be promptly and effectively implemented or recommended for implementation, as needed, to minimize the consequences of emergencies and to protect the health and safety of workers and the public. Protective actions must be implemented individually or in combination to reduce exposures to a wide range of hazardous materials. Protective actions must be reassessed throughout an emergency and modified as conditions change. Reentry activities must be planned, coordinated, and accomplished properly and safely.				
13.2	Operational Emergency Base Program					
13.2.1	0:	The contractor at all DOE/NNSA facilities must — Develop procedures to implement the separate protective actions of evacuation and sheltering of employees; Develop a procedure to account for employees after emergency evacuation has been completed; Ensure the protection of workers, covered by 29 CFR 1910.120, involved in response and clean-up.				
13.3	Operational Emergency Hazardous Material Program					

13.	Protective Actions and Re-entry	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
13.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also predetermine protective actions for onsite personnel and the public, and must include — Methods for controlling, monitoring, and maintaining records of personnel exposures to hazardous materials;Procedures to implement the separate protective actions of evacuation and sheltering of employees;Methods for controlling access to contaminated areas and for decontaminating personnel or equipment exiting the area;Actions that may be taken to increase the effectiveness of protective actions [i.e., heating, ventilation, and air conditioning (HVAC) shutdown during sheltering];Methods for providing timely recommendations to appropriate State, Tribal, or local authorities of protective actions, such as sheltering, evacuation, relocation, and food control; andSpecific protective action criteria, based on the Base Order, paragraph 4a(14), for use in protective action decision making.				

14.	Emergency Medical Support	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
14.1	Overall					
14.1.1		Medical support for contaminated or injured personnel must be planned and promptly and effectively implemented. Arrangements with offsite medical facilities to transport, accept, and treat contaminated, injured personnel must be documented				
14.2	Operational Emergency Base Program					
14.2.1		The contractor at all DOE/NNSA facilities must—Provide medical treatment and planning for mass casualty situations[See also DOE O 440.1A.]Coordinate in advance the sharing of patient information between onsite and offsite health care providers during emergencies, consistent with the requirements of Health Insurance Portability and Accountability Act of 1996 [42 USC 300].				
14.3	Operational Emergency Hazardous Material Program					
14.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also —Provide medical support for workers contaminated by hazardous material; [See also DOE O 440.1A.]Document arrangements with onsite and offsite medical facilities to accept and treat contaminated, injured personnel.				

15.	Emergency Public Information	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
15.1	Overall					
15.1.1		Accurate, candid, and timely information must be provided to workers, the news media, and the public during an emergency to establish facts and avoid speculation. Emergency public information efforts must be coordinated with DOE and NNSA (if appropriate); State, local, and Tribal governments; and Federal emergency response organizations, as appropriate. Workers and the public must be informed of emergency plans and planned protective actions before emergencies.				
15.2	Operational Emergency Base Program					
15.2.1		The contractor at all DOE/NNSA facilities must prepare an Emergency Public Information Plan. The same plan can cover multiple facilities on a site.				
15.2.2		The plans must provide— Identification of personnel, resources, facilities, and coordination procedures necessary to provide emergency public information; A program for training and exercises of personnel who will interact with the media; A methodology for informing workers and the public of DOE/NNSA emergency plans and protective actions, before and during emergencies; Coordination of public information efforts with State, local, and Tribal governments, and Federal emergency response plans, as appropriate.				
15.2.3		The emergency public information program must have provisions in place to establish a media center. A media center is a designated location where Cognizant Field Element and contractor personnel can conduct the necessary briefings and press conferences regarding an Operational Emergency at the facility.				
15.2.4		In situations involving classified or unclassified controlled information, the contractor must provide sufficient publicly releasable information to explain the emergency response and protective actions required for the health and safety of workers and the public.				

15.	Emergency Public Information	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
15.2.5		Public announcements in areas involving classified or unclassified controlled information must be reviewed by the appropriate official before release to ensure that no classified or unclassified controlled information is contained in the announcement.				
15.2.6		When directed by the Cognizant Field Element, a contractor public information officer must be assigned to the emergency public information response team involved in a significant offsite response deployment.				
15.2.7		The DOE/NNSA (as appropriate) Director of Public Affairs and the Headquarters Emergency Manager must be informed of all DOE/NNSA emergency public information actions. These notifications must be made as soon as practicable.				
15.2.8		Initial news releases or public statements must be approved by the Cognizant Field Element official responsible for emergency public information review and dissemination. Following initial news releases and public statements, updates must be coordinated with the DOE/NNSA (as appropriate) Director of Public Affairs and the Headquarters Emergency Manager.				
15.2.9		An emergency public information communications system must be established among Headquarters, Cognizant Field Element, and on-scene locations.				
15.3	Operational Emergency Hazardous Material Program					
15.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also have provisions in place to establish a Joint Information Center (JIC). A JIC is a working location, where multiple jurisdictions gather, process and disseminate public information during an emergency. The JIC must be adequately staffed with personnel trained to serve as spokesperson and newswriter. Personnel must be assigned to the JIC to provide support in media services, public inquiry, media inquiry, JIC management and administrative activities, and media monitoring. Persons with technical expertise related to the emergency and with spokesperson training must also be assigned to the JIC. The JIC must be established, directed, and coordinated by the senior Cognizant Field Element public affairs manager, or a designee.				

15.	Emergency Public Information	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
15.3.2		The contractor providing personnel for the Departmental emergency response assets [Aerial Measuring System (AMS), Accident Response Group (ARG), National Atmospheric Release Advisory Center (NARAC), Federal Radiological Monitoring and Assessment Center (FRMAC), Nuclear Emergency Support Team (NEST), Radiological Assistance Program (RAP), and Radiation Emergency Assistance Center/Training Site (REAC/TS)] must apply the Emergency Public Information Plan during deployment of the assets.				

16.	Termination and Recovery	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
16.1	Overall					
161.1		An Operational Emergency can be terminated only after a predetermined set of criteria has been met and termination has been coordinated with offsite agencies. Recovery from a terminated Operational Emergency must include: communication and coordination with State, Tribal, and local government and other Federal agencies; planning, management, and organization of the associated recovery activities; and ensuring the health and safety of the workers and public.				
16.2	Operational Emergency Base Program	The state of the s				
16.2.1		The contractor at all DOE/NNSA facilities must— Coordinate termination with State, Tribal, and local agencies and organizations responsible for offsite emergency response and notification; and Establish criteria for resumption of normal operations (i.e., recovery). Recovery must also include provisions for investigation of the root cause(s) of the emergency and corrective action(s) to prevent recurrence in accordance with Departmental requirements (e.g., see DOE O 225.1A, Accident Investigations, dated 11-26-97, DOE O 231.1A, Environment, Safety, and Health Reporting, with Change Idated 6-3-04, and DOE 5480.19, Conduct of Operations Requirements for DOE Facilities, with Change 2, dated 10-23-01).				
16.3	Operational Emergency Hazardous Material Program					

16.	Termination and Recovery	Criteria	Waivers/Applicability	Implementation	Statement of Implementation by Site/Facility	Validation of Compliance
16.3.1		The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also—Establish predetermined criteria for termination of emergencies;Have the means for estimating exposure to hazardous materials and for protecting workers and the general public from exposure during reentry and recovery activities;Develop recovery procedures that include dissemination of information to Federal, State, Tribal, and local organizations regarding the emergency and possible relaxation of public protective actions; planning for decontamination actions; establishment of a recovery organization; development of reporting requirements; and establishment of criteria for resumption of normal operations;Not downgrade emergencies, once categorized, to a lower significance category unless the original categorization was incorrect. Emergency classification must be reviewed periodically to ensure the classification is commensurate with response activities.				

3. EMERGENCY MANAGEMENT ACCREDITATION EVALUATION GUIDE

3.1 DOCUMENT DESCRIPTION

Following are the assembled sections of an Evaluation Guide to be used by fully qualified and assigned evaluators to conduct Emergency Management Accreditation (EMA) evaluations of candidate DOE and NNSA sites. This document consists of sixteen (16) sections that have been assembled in the order that they appear in the DOE O 151.1C Contractor Requirements Document (CRD). Each section includes the following:

- **General Description**—a brief description of the element taken from the CRD
- **Key references** used in assembling the criteria associated with the element.
- Typical compliance problems assembled from sources such as the OA Inspectors Guide, data from analysis of past DOE Complex exercise reports, and analyses from No-Notice Exercise Program.
- Instructions to Evaluators—section is divided into two columns, the left side containing specific evaluation criteria with references and the right is generally left blank to contain evaluator notes. The contents of the left column are divided into two major sections, Document/Records Review and Observations. At the start of each of these sections, there are recommendations to evaluators regarding the types of documents and records to review as part of the evaluation, positions to interview, and performance observations that should typically be made in order to assess the readiness and quality of emergency management programs.

3.1.1. CRITERIA AND NUMBERING

The primary references for criteria stated in this document are from the DOE O 151.1C Contractor Requirements Document. Sub-references are from the EMG Evaluation Criteria, Draft 12/13/05 and other DOE and Federal requirements documents that relate to the emergency management elements and particular topics described in the primary references.

Evaluation Criteria are numbered for each section. The basis for numbering is the CRD-based Matrix, Draft 11/10/05, which is based on the DOE O 151.1C, Contractor Requirements Document. Primary references from that document are bolded and subcriteria associated with each of the primary references are numbered accordingly to indicate the association with a primary CRD section reference. **Please note:** The system of criteria numbering does not appear entirely sequential because some of the primary CRD references and sub-references naturally fall under the Documents/Records section and others fall under the Observations section. In either case, the numbering of subreferences will follow their primary CRD reference.

3.1.2. DOCUMENT/RECORDS VS. OBSERVATIONS

Evaluators should note that although a particular evaluation criterion may be located primarily in the Documents/Records section there may still be observations and interviews that should be made at specific sites visited for performing EMA evaluations. Similarly, if evaluation criteria are found in the Observations section, there may still be documents and records that should be reviewed to ascertain conformance with the criteria.

3.1.3. TRAINING

How to use this document will be part of training conducted for EMA Evaluators. It is also recommended that sites applying for EM accreditation receive a copy of this document in order to have full understanding of the criteria upon which they will be evaluated.

3.2 Element 1: General Requirements

3.2.1. Description

There must be a Comprehensive Emergency Management System designed to:

Minimize the consequences of all emergencies involving or affecting Departmental facilities, and activities (including transportation operations/activities);

Protect the health and safety of all workers and the public from hazards associated with DOE/NNSA operations and those associated with decontamination and decommissioning (D&D), and environmental restoration;

Prevent damage to the environment; and

Promote effective and efficient integration of all applicable policies, recommendations, and requirements, including Federal interagency emergency plans. (1.1.1)

Reference DOE Order 151.1C, Attachment 2, Contractor Requirements Document Section 1.

3.2.2. Typical Compliance Problems

Sites do not take into account how changes inherent in site activities related to special operations, decontamination, decommissioning, and environmental restoration impact the planning basis for emergency response as well as response itself.

Planners duplicate efforts and fail to integrate planning by developing multiple plans to meet all Federal agency, state, and DOE requirements.

Contractor does not perform adequate analysis of hazards to support prevention of unplanned releases.

Contractor does not develop a fully integrated operational emergency hazardous materials emergency response program.

3.2.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW NOTES Review hazards surveys and hazards assessments. Review records of changes to hazards surveys and assessments and emergency plan that are related to D&D activities. Review emergency plan and emergency procedures. Review records of program exemptions. Review internal and external audit reports and evaluations of emergency management program. Review records of program approvals. Review ERAP and descriptions of site description and scope of activities. Review communications and direction from Cognizant Field Element to the contractor regarding emergency management program.

Review how transportation is addressed in the HS/EPHA.	
1.1.1 Is a Comprehensive Emergency	
Management System in place designed to:	
Minimize the consequences of all emergencies	
involving or affecting Departmental facilities,	
and activities (including transportation	
operations/activities);	
Protect the health and safety of all workers	
and the public from hazards associated with	
DOE/NNSA operations and those associated	
with decontamination, decommissioning, and	
environmental restoration;	
Prevent damage to the environment; and	
Promote effective and efficient integration of	
all applicable policies, recommendations, and	
requirements, including Federal interagency	
emergency plans?	
Ref. DOE O 151.1 C, CRD Section 1	
1.2.1 Is there an integrated Operational	
Emergency Base Program (see also	
DOE O 151.1C, Chapter III) for each facility	
and activity?	
Ref. DOE O 151.1 C, CRD Section 2	
1.2.2 Is the Operational Emergency Base Program based on a Hazards Survey?	
Ref. DOE O 151.1 C, CRD Section 2a	
1.2.3 Does the Operational Emergency Base	
Program:	
Provide the framework for response to	
serious events involving health and safety, the	
environment, safeguards, and security, and,	
Does it ensure all requirements of DOE	
regulations and directives, regulations	
developed by other Federal agencies, and, if	
applicable, State and local requirements	
addressing emergency issues are seamlessly	
integrated without duplication of emergency	
management effort?	
Ref. DOE O 151.1 C, CRD Section 2c	

Identify the hazards that may result from an unplanned release of hazardous materials; Strive to prevent unplanned releases of hazardous materials from DOE/NNSA facilities; Take any steps necessary to prevent releases; and Use feasible means to eliminate or materially reduce the hazard to workers and the public? Ref. DOE O 15.1.1 C, CRD Section 3a 1.3.2 Does the contractor execute this general duty by developing and documenting an integrated Operational Emergency Hazardous Material Program? Ref. DOE O 15.1.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 15.1.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements? Ref. DOE O 15.1.1 C, CRD Section 3b(1)(b)
hazardous materials from DOE/NNSA facilities; Take any steps necessary to prevent releases; and Use feasible means to eliminate or materially reduce the hazard to workers and the public? Ref. DOE O 151.1 C, CRD Section 3a 1.3.2 Does the contractor execute this general duty by developing and documenting an integrated Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
Use feasible means to eliminate or materially reduce the hazard to workers and the public? Ref. DOE O 151.1 C, CRD Section 3a 1.3.2 Does the contractor execute this general duty by developing and documenting an integrated Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
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1.3.2 Does the contractor execute this general duty by developing and documenting an integrated Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
integrated Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b 1.3.3 Are the results of the Emergency Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
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Planning Hazards Assessment (EPHA) used to determine the necessary personnel, resources, and equipment for the Operational Emergency Hazardous Material Program? Ref. DOE O 151.1 C, CRD Section 3b(1)(a) 1.3.4 If the quantitative analysis indicates that all events would be classified as less than an Alert, do the minimum program requirements encompass the requirements for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120 and the Operational Emergency Base Program requirements?
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Emergency Base Program requirements?
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KELDUR O 151.1 C. CKD SECTION SOCION
1.3.5 Does the organization adjust its
Operational Emergency Hazardous Material
Program to be commensurate with hazards
that remain after decontamination and
decommission action is completed at each
DOE closure site/facility?
Ref. DOE O 151.1 C, CRD Section 3b(2)

1.3.6 Has the organization developed,	
implemented, documented, and maintained	
an effective, integrated emergency	
management program that is commensurate	
with the hazards and that addresses the	
following program elements: program	
administration; training and drills; exercises;	
readiness assurance; emergency response	
organization; offsite response interfaces;	
emergency facilities and equipment;	
emergency categorization and classification;	
notifications and communications;	
consequence assessment; protective actions	
and reentry; emergency medical support;	
emergency public information; and	
termination and recovery?	
Ref. DOE O 151.1 C, CRD Section 3b(3)	
1.3.7 The contractor at a site with multiple	
facilities may place facility-specific	
requirements in their emergency program on	
a site-/contractor-level organization (such as a	
single, site-wide public information program	
rather than separate programs at each	
facility.)	
If this is done, does the contractor gain	
approval, in writing, from the Cognizant	
Field Element before replacing the facility-	
specific requirements with site-/contractor-	
level requirements?	
Ref. DOE O 151.1 C, CRD Section 3c	
1.3.7.1 Replacing facility-specific requirements	
with site- or contractor-specific requirements	
does not require an exemption.	
does not require an exemption.	
Does the contractor placing requirements on	
a site-/contractor-level organization meet the	
requirements of the Operational Emergency	
Hazardous Material Program if the site	
contains both Operational Emergency Base	
Program and Operational Emergency	
Hazardous Material Program facilities?	

1.3.7.2. After gaining approval of the Cognizant	
Field Element Manager, did the contractor note	
those requirements placed on the site-	
/contractor-level organization in the emergency	
plan at both the facility and site/contractor	
levels, as well as in the program description of	
the Emergency Readiness Assurance Plan	
(ERAP)?	
Ref. DOE O 151.1 C, CRD Section 3c(2)	
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Observations by Evaluators	Notes
	Notes
Observations by Evaluators	Notes
Observations by Evaluators Interview personnel responsible for:	Notes
Observations by Evaluators Interview personnel responsible for: Planning and administration of emergency	Notes
Observations by Evaluators Interview personnel responsible for: Planning and administration of emergency management programs;	Notes
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3.3 Element 2: Technical Planning Basis

3.3.1. Description

Each Hazards Survey must:

Identify (e.g., in matrix or tabular form) the emergency conditions (e.g., fires, work place accidents, natural phenomena, etc.) that affect the facility;

Describe the potential health, safety, or environmental impacts; and

Indicate the need for further analyses of hazardous materials in an EPHA; and identify the planning and preparedness requirements that apply to each type of hazard. (2.1)

A Hazardous Material Screening Process must identify specific hazardous materials and quantities that, if released, could produce impacts consistent with the definition of an Operational Emergency. The potential release of these materials to the environment requires further analysis in an EPHA. (2.3)

In an EPHA, identify hazards and the potential consequences from unplanned releases of (or loss of control over) hazardous materials, using accepted assessment techniques (2.10)

Reference DOE Order 151.1C, Chapters III and IV, and Attachment 2, Contractor Requirements Document Sections 2 and 3.

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume II, Section 1
Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D,
Evaluation Criteria

3.3.2. Typical Compliance Problems

All facilities are not included in hazards surveys.

Mechanisms are not established for preparation, review and approval of hazards surveys and assessments.

EPZ is not reviewed and approved by the DOE operations office manager.

Concurrence is not obtained with offsite jurisdictions on the EPZ configuration.

The screening process for hazardous materials is not correctly applied.

The full spectrum of emergency scenarios is not analyzed, including: malevolent act and transportation event scenarios; lower consequence/higher probability events; and ground and waterborne pathways for situations where a time-urgent response is required.

Correct material-at-risk amounts are not used in calculations.

Organization did not evaluate offsite hazardous operations with potential impact to the site, including fixed facilities and transportation activities.

Facility and site boundaries are not determined correctly.

Results of hazards surveys and assessments are not used as the basis for categorization/classification methodology.

Hazards survey is not documented in a format useable by site emergency responders, nor made available in emergency response facilities as a reference for assisting response efforts.

Results of hazards surveys and hazards assessments are not used as the basis for medical response and planning.

Hazards assessment results are not used to determine EPZ configuration.

Tests of reasonableness are not applied to EPZ configuration.

EALs contained in the emergency plan implementing procedures are not consistent with EALs described in the technical planning basis.

Transportation activities are not included in HS/E	
Mechanisms are not established or effective for no	
hazards assessments of changes in material invent	
Inventory information is not confirmed with method	
Order requirements and/or site procedures are not	followed when developing hazards surveys.
Organization does not consider engineering modif	ications that add plant instrumentation for
potential unmonitored release pathways.	
3.3.3. Instructions to Evaluator:	
DOCUMENT/RECORDS REVIEW	NOTES
Review hazards surveys.	
Review hazards assessments to determine if	
they were prepared in accordance with	
procedure and possess attributes prescribed by	
the order and the EMG.	
Review site facility information, including	
maps, to ensure all facilities are considered in	
the hazards survey.	
Review records of site reviews of hazards	
surveys and hazards assessments.	
Compare the facility/site chemical inventory	
system quantities with the screening process	
information listed in the hazards survey.	
Review procedures for preparing and	
conducting hazards surveys and assessments	
and administrative procedures for reviewing	
these documents.	
Review mechanisms for notifying the	
organization responsible for hazards surveys	
and assessments of changes in material	
inventories and event initiators.	
Review chemical and radiological and	
biological inventories, documents or databases.	
Review vulnerability analyses for facilities of	
interest.	
2.1.1 Does each Hazards Survey:	
Identify (a.g. in matrix on tabular form) the	
Identify (e.g., in matrix or tabular form) the	
emergency conditions (e.g., fires, work place	
accidents, natural phenomena, etc.) that	
affect the facility;	
Describe the notantial health sefety or	
Describe the potential health, safety, or	
environmental impacts;	
Indicate the need for further analyses of	
Indicate the need for further analyses of	
hazardous materials in an EPHA; and	
Identify the planning and preparedness	
Identify the planning and preparedness	
requirements that apply to each type of hazard?	
Ref. DOE O 151.1 C, CRD Sec. 2a(1)	

2.1.1.1 Does the Hazards Survey identify the generic types of serious emergency events or conditions to which the specific facility or activity may be exposed (e.g., fires; flood; tornadoes; earthquakes; hazardous material releases; regulated pollutant or oil spills; safeguards and security events; work place accidents; malevolent acts; mass casualties; wildland fires; nearby offsite non-DOE hazardous material accidents)? Ref. EC P1.1	
2.1.1.2 A Hazards Survey may cover multiple facilities. Are all the facilities on a site covered by Hazard Surveys? Ref. DOE O 151.1C III Sec. 3	
2.1.1.3 Does the Hazards Survey qualitatively identify the potential impacts of different generic types of emergencies on health and safety, the environment, and national security? Ref. EC P1.2	
2.1.1.4 Are facilities and onsite activities that require a documented, quantitative Emergency Planning Hazards Assessment (EPHA) identified by a hazardous material screening process and so indicated in the Hazards Survey? Ref. EC P1.4	
2.1.1.5 Does the Hazards Survey identify emergency management requirements that constitute the Operational Emergency Base Program? (Including: DOE orders [other than 151.1], other Federal agency, state, and local emergency planning and preparedness requirements associated with different generic types of emergency events or conditions and applicable to the facility or activity; and existing plans, such as earthquake self-help plans or mass casualty plans, detailing compliance with Federal, State, or local standards, incorporated directly into the Operational Emergency Base	
Program or invoked by reference.) Ref. EC P1.3 2.1.2 Are Hazards Surveys updated every	
three years and prior to significant changes to the site/facility or to hazardous material inventories? Ref. DOE O 151.1 C, CRD Section 2a(3)	

2.2.1 Does a Hazardous Material Screening	
Process identify specific hazardous materials	
and quantities that, if released, could produce	
impacts consistent with the definition of an	
Operational Emergency (OE)?	
The potential release of these materials to the	
environment requires further analysis in an	
EPHA.	
Ref. DOE O 151.1 C, CRD Section 2b	
2.2.1.1 Is a hazardous material screening process	
developed and applied to facilities and activities	
involved in producing, processing, handling,	
storing, or transporting hazardous materials that	
have the potential to pose a serious threat to	
workers, the public, or the environment?	
Ref. EC P1.6	
2.2.1.2 Does the screening process identify	
candidate hazardous materials that, if released in	
an uncontrolled manner, would immediately	
threaten or endanger those who are in close	
proximity; have the potential for dispersal	
beyond the immediate vicinity in quantities that	
threaten onsite personnel or the public; and have	
a potential rate of dispersal to require a time-	
urgent response to implement protective actions	
for workers or the public?	
Ref. EC P1.7	
2.2.1.3 Does the hazardous material screening	
process identify all hazardous materials in a	
facility/activity that require further analysis in an	
EPHA?	
Ref. EC P1.8	
2.2.2 Are all radioactive materials in a	
facility/activity subjected to a hazardous	
material screening process?	
Ref. DOE O 151.1C, CRD Section 2b(2)(a)1	
2.2.2.1 Do radioactive materials excluded from	
further analysis in the EPHA only include the	
following:	
a. Sealed radioactive sources that are engineered	
to pass the special form testing specified by	
DOT or ANSI;	
b. Materials in solid form for which there is no	
plausible dispersal mechanism; materials stored	
in DOE type B shipping containers with	
overpack, if the certificates of compliance are	
current and the materials are authorized by the	
certificate; and	
c. Materials used in exempt commercially	
available products?	
Ref. EC P1.10	

2.2.2.2 Do radioactive hazardous materials that	
are analyzed in the EPHA include the	
radioactive materials listed in DOE STD 1027-	
92 in quantities greater than the Category 3	
values given in Attachment 1, Table A.1 of that	
Standard?	
Ref EC P1.11	
2.2.3 Are all chemicals in a facility/activity	
with known or suspected toxic properties	
subjected to a hazardous material screening	
process?	
Ref. DOE O 151.1C, CRD Section 2b(2)(b)1	
2.2.3.1 Do chemicals excluded from further	
analysis in the EPHA include the following:	
a. Materials used in the same form, quantity and	
concentration as a product packaged for	
distribution and use by the public;	
b. Materials that have health hazard rating of 0,	
1, or 2 based on NFPA 740; and	
c. Solid or liquid materials that because of their	
physical form or other factors do not present an	
airborne exposure hazard?	
Ref. EC P1.13	
2.2.3.2 Are quantities of chemical hazardous	
materials considered to be "easily and safely	
manipulated by one person" determined in	
accordance with provisions of 29 CFR	
1910.1450(b)?	
Ref. EC P1.14	
2.2.3.3 Do chemical hazardous materials in	
quantities greater than a quantity that can be	
"easily and safely manipulated by one person"	
that are analyzed in an EPHA include:	
a. Chemicals with an assigned health hazard	
rating of 3 or 4 based on NFPA 704; and	
b. Chemicals without an assigned health hazard	
rating.	
Ref. EC P1.15	

biological agents and toxins must include Federally regulated agents and toxins identified in lists published in Department of Health and Human Services (HHS) regulations [42 CFR 73] and Department of Agriculture (USDA) regulations [7 CFR 331 and 9 CFR 121], and require an EPHA and a Hazardous Material Program. Toxins listed in 42 CFR 73 and 9 CFR 121 must exceed the minimum quantities specified to be Federally regulated. Does the site meet this requirement if applicable? Ref. DOE O 151.1C, CRD Section 2b(2)(c) 2.2.4.1 Are all biological hazardous materials in a facility activity subjected to a hazardous material screening process? Ref. EC P1.16 2.2.4.2 If biological agents and toxins require further analysis in an EPHA, then is a Hazardous Materials Program established? Ref. EC P1.18 2.2.5 Did the site consider the possibility that excluded materials could initiate, through fires or explosions, the release of other hazardous materials? Ref. Doe O 151.1C, CRD Section 2b(2)(d) 2.2.5.1 Did the site ensure that emergency events or conditions are NOT excluded from analysis in the EPHA based solely on calculated occurrence probabilities or arbitrarily defined delimiters (e.g., credible or incredible, likely or unlikely)? Ref. EC P1.27 2.2.6 If the screening process identifies at least one hazardous material requiring further analysis, does the Hazards Survey indicate that an EPHA is needed for that facility or activity?	2.2.4 At a minimum, specific hazardous	
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facility or activity?		
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	Ref. DOE O 151.1C, CRD Section 2b(3)	

2.2.7 Is a description of the screening process and the results of its application to the hazardous materials in the facility/activity included in the Hazards Survey or incorporated by reference into supporting documentation?	
For facilities/activities requiring an EPHA, is this documentation referenced or included in the EPHA?	
If the quantitative analysis indicates that all events would be classified as less than an Alert, an EPHA is not required. Are the results of the hazardous material screening process and the quantitative analysis incorporated directly into the Hazards Survey or incorporated by reference in the Hazards Survey? Ref. Doe O 151.1C, CRD Section 2b(4)	
2.3.1 In an EPHA, does the facility identify	
hazards and the potential consequences from	1
unplanned releases of (or loss of control over)	ı
hazardous materials, using accepted	l
assessment techniques?	ı
Ref. DOE O 151.1C, CRD Section 3b(1)	
2.3.1.1 If applicable, did the site/facility prepare, submit, maintain and update offsite consequence	l
analysis in a Risk Management Plan to include	l
worst-case release scenarios for toxic substances	l
held above threshold quantity and for regulated	l
flammable substances above threshold quantity?	1
Ref. 40 CFR 68, Chemical Accident Prevention,	1
Subpart G, Risk Management Plan	

2.3.1.2 Does the EPHA describe the site and facility or activity, directly or by reference, including:	
Site location, facility description, operations, mission, processes, tenant activities, and facility locations (including proximity to adjacent facilities, site boundary, utility and transportation networks);	
Transportation activities, including types and quantities of materials transported, containers, routes, speeds and controls exercised; and	
Characteristics of the region beyond the site boundary including summaries of demographics (including special populations, administrative boundaries, geographic features, and economic enterprises (e.g., farms, factories)? Ref. EC P 1.23	
2.3.1.3 Does the EPHA contain a current, accurate compilation of hazardous material inventories or maximum quantities associated with a facility or activity based on reliable and comprehensive methods of hazardous material identification (e.g. walk-throughs, shipping records, local chemical inventory systems)? Ref. EC P 1.24	
2.3.1.4 Are analyzed hazardous materials characterized in the EPHA as follows:	
Storage location, process used, physical properties, and health effect parameters;	
Engineered controls, administrative controls, storage segregation, safeguards and safety systems for prevention and/or mitigation f releases are identified; and	
Actual barriers to release are identified, such as containers, buildings, berms, sumps, catch basins, filters, and HVAC systems? Ref. EC P1.25	

2.3.1.5 Are a spectrum of potential emergency	
event/condition scenarios postulated and	
realistically analyzed in the EPHA, including:	
Applicable initiating events (e.g., fire, explosion,	
natural phenomena, malevolent events,	
accidents, external events);	
Contributing events, accident mechanisms,	
equipment or system failures, engineered safety	
system and control failures, source terms,	
material release chemistry and characteristics, environmental transport and diffusion, exposure	
considerations, and health effects;	
Dence of sound makehiliding and sound	
Range of event probabilities and consequences, from low probability, high consequence to high	
probability, low consequence, including	
Beyond-Design-Basis events;	
Events exclusively affecting onsite personnel, as	
well as those affecting the offsite public; and	
Potential malevolent acts applicable to the facility based on Design Basis Threat guidance,	
if available?	
Ref. EC P1.26	
2.3.1.6 Are indicators of emergency event or condition scenarios that can be used for	
recognition purposes in developing OE	
categorization criteria and Emergency Action	
Levels (EALs) as appropriate, identified and	
documented in the EPHA?	
Ref. EC P1.28 2.3.1.7 Are biological agent release scenarios	
analyzed to obtain indicators for recognizing OE	
events/conditions and for initial protective	
actions?	
Is the analysis methodology documented in the EPHA?	
Ref EC P1.30	
2.3.1.8 Are classified material quantities and	
storage analyzed and documented in a classified annex to the EHPA?	
Ref. EC P1.31	

2.3.2 Is an accurate and timely method for	
tracking changes in operations, processes, or	
accident analyses that involve hazardous	
materials (e.g., introduction of new materials,	
new uses, significant changes in inventories,	
modification of material environments)	
established and maintained for each	
facility/activity?	
Does the method allow sufficient time for	
emergency management personnel to review	
the EPHA and modify plans and procedures,	
as necessary?	
Ref. DOE O 151.1C, CRD Section 3b(1)(c)	
2.3.2.1 Are management procedures	
implemented to ensure that emergency planners	
are notified of significant changes in facility	
inventories, processes, or activities that may	
affect the results of the EPHA [e.g., active	
involvement of emergency management	
personnel in the facility Integrated Safety	
Management System (ISMS)]?	
Ref. EC P1.34	
2.3.2.2 Is sufficient transition time allowed for	
emergency management personnel to review the	
EPHA and modify plans or procedures, as	
necessary, to account for changes in the	
hazardous material situation?	
Ref. EC P1.35	
2.3.2.3 Are changes made in the facility or	
activity safety analysis reports, probabilistic risk	
assessments, vulnerability assessments, fire	
<u>-</u>	
hazard analyses, environmental impact statements, and other documents that address	
hazards or potential consequences integrated	
with maintenance of the EPHA?	
Ref. EC P1.36	
2.3.2.4 If changes result in an increase in hazardous material inventories or release	
potential, is the EPHA is updated immediately?	
Ref. EC P1.37	
2.3.2.5 After a D&D action is completed, is the	
Operational Emergency Hazardous Materials	
Program adjusted to be commensurate with the hazards that remain?	
Ref EC P1.38	
2.3.3 Is the EPHA reviewed at least every	
three years and updated prior to significant changes to the site/facility or hazardous	
material inventories?	
Ref: DOE O 151.1C, CRD Section 3b(1)(d)	

2.2.4 Doog the EDIIA include a determination	
2.3.4 Does the EPHA include a determination	
of the size of the Emergency Planning Zone	
(EPZ)? Are assumptions, methodologies,	
models, and evaluation techniques used in the	
EPHA documented?	
Ref. DOE O 151.1C, CRD Section 3b(1)(e)	
2.3.4.1 Is the EPZ identified as the area within	
which protective actions will most likely be	
taken to protect workers or the public from the	
effects of the majority of airborne hazardous	
material releases from the facility or site?	
Ref. EC P1.40)	
,	
2.3.4.2 Are conservative estimates of the	
consequences of release scenarios (primarily	
radioactive and chemical) calculated and	
documented in the EPHA?	
Do receptor locations include facility and site	
boundaries, collocated facilities, and offsite	
locations, including special populations (e.g.,	
schools, hospitals, and prisons)?	
Are calculations performed for the purposes of	
protective action determinations, response	
decision-making, and special planning, (e.g.,	
EPZ determinations)?	
,	
Are methods and models used for calculating	
consequences applicable to the releases	
analyzed; assumptions used are valid and	
documented?	
Ref. EC P 1.29	
2.3.4.3 Does the EPZ define an area within	
which protective actions will provide for	
substantial reduction in early lethality for all	
analyzed airborne hazardous material releases?	
Ref. EC P1.41	
2.3.4.4 Is the size and shape of the EPZ	
determined by the spectrum of scenarios, the	
consequences of the potential releases, health	
effect parameters, and geo-political boundaries	
beyond the site boundary?	
Ref. EC P 1.39	
2.3.4.5 Is the EPZ sufficiently large that the	
planning efforts within the defined EPZ provide	
a substantial basis for expansion of response	
activities beyond the EPZ, if warranted by actual	
conditions?	
Ref. EC P 1.42	

2.3.4.6 The maximum EPZ for any DOE or	
NNSA facility or site does not exceed a nominal	
radius of 10 miles (16 kilometers). Does the site	
conform?	
Ref. EC P1.43	
2.3.4.7 Biological hazardous material release	
scenarios should not be used in determining the	
size of the EPZ. Does the site conform?	
Ref. EC P1.44	
2.3.5 The Office of Secure Transportation	
(OST) must develop an EPHA for OST	
shipments to provide the technical planning	
basis for the OST Operational Emergency	
Hazardous Material Program. Is there	
conformity with this requirement?	
Ref. DOE O 151.1C, CRD Section 3b(1)(f)	
2.3.6 An EPHA must be developed for	
shipments that do not satisfy governing DOT	
regulations and specifications for commercial	
hazardous materials transport. However, if a	
shipment satisfies DOT regulations and	
specifications, then an EPHA is not required.	
Is there conformity?	
Ref. DOE O 151.1C, CRD Section 3b(1)(g)	
Observations by Evaluators	Notes
Interview personnel who have prepared	
hazards surveys and assessment for the site.	
Walk down site and facilities in relation to	
hazards survey and assessment prepared by the	
organization.	
Observe use of hazards assessment information	
during emergency exercise response.	

3.4 Element: 3. Program Administration

3.4.1. Description

Effective organizational management and administrative control of the facility emergency management program must be provided by establishing and maintaining authorities and resources necessary to plan, develop, implement, and maintain a viable, integrated, and coordinated comprehensive emergency management program. (3.1.1)

Reference DOE Order 151.1C, Chapter IV and Attachment 2, Contractor Requirements Document, Section 4

Reference Emergency Management Guide, DOE G 151.1-1, Volume III, Section 1, Program Administration

Reference Emergency Management Guide, DOE G 151.1-1, Volume III, Appendix A, Standard Format and Content for Emergency Plans for Hazardous Materials Programs (Draft)

3.4.2. Typical Compliance Problems

The Contractor Requirements Document (CRD) has not been included in all site/facility management contracts associated with the management and operation of the Site/facility and its associated transportation activities. [Note: putting the CRD into the contract is a Federal responsibility.]

Emergency management programs fail to translate DOE requirements, policy, or guidance into specific plans, procedures, readiness assurance activities, and emergency response.

Implementing procedures and supporting documents are found to have factual or editorial errors that would degrade the effectiveness of response.

Plans or procedures that give direction to planning, preparedness, and response activities are not current.

Program documentation such as EPHA, training materials, lesson plans, agreements and understandings, protocols, or other emergency management documents have errors or inconsistencies or are not maintained current.

The emergency management program lacks qualified staff to perform emergency management/response functions (e.g., inadequate numbers, qualifications, or capabilities.)

Emergency preparedness programs, including training and exercises, do not exist, or are not adequate to prepare the emergency response organization for response actions that may be required to respond to operational emergencies.

The site/facility has not planned for and implemented adequate secondary or backup facilities, equipment, and staff needed to respond to operational emergencies.

There is inadequate cooperative/joint planning or a lack of agreement on how to respond to certain circumstances, e.g., incompatible communications systems or terminology, uncoordinated response actions, disputed authorities, or ineffective division of roles and responsibilities

Resource needs for a viable, integrated, and coordinated emergency management program are not adequately identified or fulfilled.

Records, such as logs, event chronologies, and data sheets generated during emergency response or exercises have factual errors, are internally inconsistent, or are not maintained current.

Records, such as equipment and facility test and maintenance records, staff training and qualification records, or documentation of meetings and planning decisions that form part of the planning basis have factual errors, are internally inconsistent, or are not maintained current.

Emergency Readiness Assurance Plan (ERAP) is not complete, has factual errors, is internally inconsistent, or is not maintained current.

3.4.3. Instructions to Evaluator:	
DOCUMENT/RECORDS REVIEW	NOTES
Review the site/facility emergency planning	
hazards assessment, emergency plan, and	
emergency plan implementing procedures.	
Review memoranda or agreements with offsite	
response organizations that may have a role in	
a response to an operational emergency.	
Review all management contractual vehicles	
established and maintained by the site/facility	
with any parties associated with the	
management and operation of the site/facility	
and its associated transportation activities.	
Review training program plan and training	
records.	
Review exercise program planning documents	
and records.	
Review ERAP and documentation of program	
reviews (internal and external), corrective	
actions, and documents that track findings and	
corrective actions.	
Review procedures in place to protect classified	
information or Unclassified Controlled	
Nuclear Information (UCNI).	
Review document control system procedures as	
well as other documents supporting a program	
that ensures the availability of vital records.	
Resolve any issues of missing, incomplete, or	
unclear documentation in the	
interview/observation phases of the inspection.	
3.1.1 Is effective organizational management	
and administrative control of the facility	
emergency management program provided	
by establishing and maintaining authorities	
and resources necessary to plan, develop,	
implement and maintain a viable, integrated,	
and coordinated comprehensive emergency	
management program?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 4 a	
3.1.2 Has the site/facility designated an	
individual (the Program Administrator) to	
administer emergency management?	
Does this individual develop and maintain the	
emergency plan, develop ERAP and annual	
updates, develop and conduct training and	
exercise programs, coordinate assessment	
activities, develop related documentation and	
coordinate emergency resources?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 4a	
204	

3.1.2.1 Has the designated Program	
Administrator ensured the development and	
maintenance of the Hazards Survey, and, as	
needed, the Emergency Planning Hazards	
Assessment?	
Ref: EC P2.1	
3.1.3 Has the contractor (at all facilities that	
are generating classified information or	
UCNI, or are conducting classified or UCNI	
operations) reviewed all emergency	
preparedness documents such as plans,	
procedures, scenarios, and assessments for	
classified information and UCNI?	
Classified information and OCN1:	
Was this review conducted by the	
appropriate official using current guidance?	
If EPHAs do not contain classified	
information or UCNI, are they reviewed by	
the emergency management program	
administrator to determine if they contain	
potentially exploitable information?	
potentiany exploitable information:	
A wa EDII A a aantainina matantiallu aunlaitabla	
Are EPHAs containing potentially exploitable	
information protected as Official Use Only	
under exemption 2 of the Freedom of	
Information Act?	
Ref. DOE O 151.1C, Attachment 2, CRD	
Section 4c	
3.1.4 Has the contractor documented the	
emergency management program in an	
emergency plan that also describes the	
provisions for response to an OE?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 4d	
3.1.4.1 Has the site/facility prepared and	
submitted the following to the Cognizant Field	
Element manager for approval:	
Documentation to establish an EPZ;	
Emergency Plans that document	
comprehensive emergency management	
programs; and ERAPs?	
Ref: DOE Order 151.1C, Chap. 1 Section 10 (c)	
Ker. DOL Order 131.1C, Chap. 1 Section 10 (c)	

3.1.4.2 Has the site/facility prepared and	
maintained emergency plans that address	
emergency classification, notification, reporting,	
response actions, training and drills, exercises,	
emergency public information, outreach and	
coordination, accident investigation, and	
applicable Federal statues, State and local laws,	
DOE Orders, and implementing regulations and	
guidance?	
Ref: DOE Order 151.1C, Chapter 1 Sec. 10 (b)	
3.1.4.3 Are emergency management plans	
developed for facilities not requiring a	
Hazardous Material Program that address the	
minimum Base Program requirements?	
1	
Ref. EC P2.14	
3.1.4.4 Are emergency management plans	
developed for facilities <u>requiring a Hazardous</u>	
Material Program that are seamlessly integrated	
with Base Program requirements?	
Ref. EC P2.15	
3.1.4.5 Are current reviewed and approved	
Hazards Surveys and EPHAs available?	
Do EPHAs provide technical planning basis	
information for the development of the	
Operational Base Program and Operational	
Hazardous Material Program, commensurate	
with the hazards?	
Ref. EC P2.24	
3.1.4.6 Do documented arrangements with	
leased facilities include:	
a. Description of how each of the lessee's	
emergency management program elements are	
integrated into the site-wide program; and	
b. A requirement that the lessee's hazardous	
•	
materials inventories be reported to the site	
emergency management program annually;	
c. A requirement that the lessee must report	
significant changes to the facility or hazardous	
material inventories prior to implementing the	
changes?	
Ref. EC P2.27	
3.1.5 Has the contractor developed	
Emergency Plan Implementing Procedures to	
describe how emergency plans must be	
implemented?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 4d	

Notes

3.1.1.1 Are facility emergency management	
programs on site consistent and integrated for	
site-wide consistency? Ref. EC P2.16	
3.1.1.2 Has administration of planning,	
preparedness, and readiness assurance activities	
been established and effectively maintained.	
Ref. EC P2.4	
3.1.1.3 Have reasonable schedules (e.g.,	
documentation submittals, reviews, and	
approvals; preparedness and readiness assurance	
activities) been established and enforced to	
ensure that program planning, preparedness, and	
readiness assurance activities are initiated,	
completed, and repeated in a timely and efficient	
manner?	
Ref. EC P 2.6	
3.1.1.4 Are sites prepared to respond to SECON	
directives issued by DOE/NNSA HQ?	
Ref: DOE M 470.4-1, Attachment 2, Part 1,	
Section B, paragraph 3a.	
3.1.1.5 Is each facility/site prepared to	
implement the security measures in Attachment	
3, "Protecting Department of Energy Facilities	
from Terrorist and Malevolent Acts" as	
applicable?	
Ref: DOE M 470.4-1, Attachment 2, Part 1,	
Section B, paragraph 3	
3.1.1.6 Do leased facilities owned by	
DOE/NNSA effectively integrate activities of	
the leased facility into the DOE/NNSA site-wide	
emergency management program?	
Ref. EC P2.17	
3.1.1.7 Are biosafety facility incident response	
plans integrated with the site-wide emergency	
management program?	
Ref. EC P2.18	
3.1.1.8 Is an emergency management document	
control system established that meets industry	
standards for document review, approval,	
distribution, and change control?	
Ref. EC P2.7	
3.1.1.9 Is development and approval of	
supporting documentation (e.g., Memoranda of	
Understanding (MOU), Memoranda of	
Agreement (MOA) accomplished; are periodic	
reviews and maintenance scheduled and	
conducted?	
Ref. EC P2.20	
3.1.1.10 Are emergency management documents	
controlled, available and current?	
Ref. EC P2.21	
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204

3.1.2.2 Are methods in place and implemented to remain appraised of current events and lessons learned and to utilize this information for continuous improvement? Is a site-wide corrective action program implemented and effective in correcting problems identified in the emergency management program? (Correction of findings and incorporation of lessons-learned are tracked, addressed, and verified)	
Ref. EC P2.22 3.1.2.3 Are specific emergency management Order requirements related to administrative responsibilities and emergency management activity (i.e., planning, preparedness, readiness assurance) parameters/constraints monitored for compliance? Ref. EC P2.23	
3.1.2.4 For biosafety facilities, is the designated Responsible Official also the facility emergency management program administrator, who is responsible for implementing and maintaining the emergency management program? Is this designated administrator/official responsible for tasks that involve compliance with the requirements for the Select Agent rule(s) [i.e. Dept. of Health and Human Services regulation 42 CFR 73 and Department of Agriculture (USDA) regulations 7 CFR 331 and 9 CFR 121] and with existing DOE/NNSA emergency management policy as expressed in DOE O 151.1C?	
3.1.2.5 Have formal review and approval processes been established and documented to ensure that the planning and development of components of the emergency management program (e.g., planning analyses, plans and procedures, supporting documentation) receive sufficient oversight by staff, management and DOE elements to ensure consistency, correctness, and completeness? Ref. EC P 2.5 3.1.2.6 Does the designated Program	
Administrator have authority and resources, commensurate with responsibilities assigned, as well as access to top-level management? Ref: EC P 2.2	

3.1.2.7 Are financial resource requirements	
identified and budgeted?	
Ref. EC P2.10	
3.1.2.8 Are facilities and equipment	
requirements identified, monitored, and	
acquired?	
Ref. EC P2.11	
3.1.2.9 Are personnel requirements identified	
and addressed?	
Ref. EC P2.12	
3.1.2.10 Are training, drills, exercises, and	
evaluation activities scheduled, conducted,	
monitored, and documented?	
Ref. EC P2.19	
3.1.3.1 If classified information or materials are	
being used or generated, are effective security	
procedures and controls implemented and are	
security reviews conducted?	
Ref. EC P2.9	
3.1.4.7 Are Emergency Action Plans in writing,	
kept in the workplace, and available to	
employees for review?	
Ref: 29 CFR 1910.38 b	
1101. 27 01 11 17 10:00 0	
Perform a walk-through of workplace	
Perform a walk-through of workplace	
Perform a walk-through of workplace areas to determine compliance with this	
Perform a walk-through of workplace areas to determine compliance with this requirement.	
Perform a walk-through of workplace areas to determine compliance with this requirement. 3.1.4.8 Does the Emergency Action Plan	
Perform a walk-through of workplace areas to determine compliance with this requirement. 3.1.4.8 Does the Emergency Action Plan include: procedures for reporting fire or other	
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Perform a walk-through of workplace areas to determine compliance with this requirement. 3.1.4.8 Does the Emergency Action Plan include: procedures for reporting fire or other emergencies; emergency evacuation, including type of evacuation and exit route assignments; procedures to account for all employees after evacuation; and procedures to be followed by employees performing rescue or medical duties? Ref: 20 CFR 1910.38 (c) 3.1.5.2 Are emergency plans and procedures are developed, verified, validated, reviewed periodically and updated as necessary? Ref. EC P2.13	
Perform a walk-through of workplace areas to determine compliance with this requirement. 3.1.4.8 Does the Emergency Action Plan include: procedures for reporting fire or other emergencies; emergency evacuation, including type of evacuation and exit route assignments; procedures to account for all employees after evacuation; and procedures to be followed by employees performing rescue or medical duties? Ref: 20 CFR 1910.38 (c) 3.1.5.2 Are emergency plans and procedures are developed, verified, validated, reviewed periodically and updated as necessary? Ref. EC P2.13 3.1.6.1 Is an auditable administrative program	
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3.5 Element: 4. Emergency Training and Drills

3.5.1. Description

A comprehensive, coordinated, and documented program of training and drills must be an integral part of the emergency management program to ensure that preparedness activities for developing and maintaining program-specific emergency response capabilities are accomplished. (4.1.1)

Reference DOE Order 151.1C, Chapters III and IV and Attachment 2, Contractor Requirements Document, Section 5

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume III, Section 2

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.5.2. Typical Compliance Problems

Line management at some sites (in particular those with multiple contractors [prime and subcontractors]) has not adequately supported the emergency management training function.

Minimum training and drill requirements have not been defined for all ERO members.

Minimum training prerequisites for ERO position assignments are not documented.

Training requirements for offsite emergency support organizations, such as hospitals and mutual aid assets are not documented.

Training requirements for transportation events have not been documented.

No annual requalification training is specified.

Training records are incomplete.

Lesson plans and training materials are not formally documented and maintained.

Training requirements are not consistent with the site hazards. Changes in site hazards are frequently not provided to the training organization to evaluate the sufficiency of the training programs.

New plans and procedures are implemented before the development and implementation of training.

New plans and procedures are provided with an implementation date that provides insufficient time to develop training.

Matrices are not developed identifying the training necessary for each position.

Training is not formally reviewed annually.

Student feedback is infrequently used to update the courseware.

Drills are not used as a source of lessons learned or as part of a feedback and improvement program.

Drill packages are incomplete. Frequently, they are missing the objectives to be demonstrated and an evaluation component.

Student feedback, actual events, and exercise results are not used to update the drill packages.

Persons assigned as alternates are less likely to participate in drills to maintain proficiency

New ERO members are assigned without notification of the emergency management training organization, thus resulting in untrained persons staffing ERO positions.

Documentation on both onsite and offsite instructors is not maintained to include qualifications, experience, and courses they are authorized to teach.

3.5.3. Instructions to Evaluator:

DOCUMENT/RECORDS REVIEW	NOTES
Review the site/facility emergency plan and	
procedures sections pertaining to training and	
drills.	

Review ERAP pertaining to training & drills.	
Review training program plan for emergency	
response.	
Review records of training.	
Review a sample of training courses to verify	
requirements for training course development,	
required content and documentation.	
Review a representative sampling of drill	
packages to determine requirements for drill	
development, content areas and documentation	
have been met.	
Review MOA/MOUs with offsite response	
organizations.	
4.1.1 Is there a comprehensive, coordinated,	
and documented program of training and	
drills that is an integral part of the emergency	
management program to ensure that	
preparedness activities for developing and	
maintaining program-specific emergency	
response capabilities are accomplished?	
Ref. DOE O 151.1 C, CRD Section 5	
4.1.1.1 Do the Plan/Procedures and Training	
Program Plan comprehensively and	
systematically lay out a program for	
accomplishing emergency management training	
goals?	
Ref. EC P3.1	
4.1.1.2 Does the Training Program Plan include	
training objectives, target audience, an outline	
and schedule of training, resources and facilities,	
organizational responsibilities, and training	
program administration?	
Ref. EC P3.1	
4.1.1.3 Does the Training Program provide a	
current and structured view of program-specific	
training requirements?	
Ref. EC P3.3	
4.1.1.4 Are training requirements clearly stated	
for key emergency management positions and	
response teams, including 1) Initial training and	
annual refresher training; 2) Refresher training	
when hazards or plans and implementing	
procedures change; and 3) Demonstration of	
proficiency through testing and drills?	
Ref. EC P3.2	
4.1.1.5 Is there a detailed list of courses and	
drills provided by the emergency management	
program?	
Ref. EC P3.3	

4.1.1.6 Have matrices been developed and	
maintained for identifying and implementing	
required training topics and courses versus the	
ERO positions?	
Ref. EC P3.3	
4.1.1.7 Do administrative program records	
provide the source for identifying qualified	
instructors, training material approval authority,	
and qualification signature authority?	
Ref. EC P3.4	
4.1.1.8 Are training records maintained for all	
personnel assigned ERO positions, primary and	
alternate, showing in-progress, final and	
upcoming re-qualification status?	
Ref. EC P3.20	
4.1.1.9 Are lesson plans, training materials and	
facilities, instructor and student materials, and	
training software maintained, formally	
documented, and included in an index or matrix?	
Ref. EC P3.19	
4.1.1.10 Does the program plan define minimum	
program standards for:	
Training required for each position (i.e., certain	
courses must be completed);	
Proficiency (e.g., minimum grades on tests, how	
prior experience is credited);	
Performance (i.e., acceptable performance	
during drills, exercises, or actual events); and	
retraining, and re-validation?	
Ref. EC P3.5	
4.4.1.1 Are training courses performance-based,	
customized to program-specific ERO positions,	
containing learning objectives, and having	
testing as a final validation of satisfactory	
completion?	
Ref. EC P3.7	
4.5.1.1 Are drill plans, training materials and	
facilities, instructor and student materials, and	
training software maintained, formally	
documented, and included in an index or matrix?	
Ref. EC P3.19	
4.5.1.2 Is drill and exercise participation and	
performance documented for each member of	
the ERO.	
Ref. EC P3.21	
Observations by Evaluators	Notes
Interview personnel with responsibility for	
development and conduct of emergency	
management training. Verify applicable	
documentation for each criterion.	
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Interview personnel in emergency responder	
positions concerning training received and drill	
participation.	
If the opportunity exists, observe conduct of a	
drill session. In any case, interview personnel	
with responsibility for developing and	
conducting emergency management training	
drills.	
4.1.1.11 Is the training program reviewed and	
updated periodically, or as required, based on	
changes in related emergency plans/procedures?	
Ref. EC P3.3	
4.2.1 Does the organization provide initial	
training and periodic drills to all workers	
who may be required to take protective	
actions (e.g., shelter-in-place; assembly,	
evacuation)? (This training is required when	
they are employed, when their expected	
actions change, or when the emergency plan	
changes.)	
changes.)	
Does the organization provide refresher	
training annually to certified operators and	
supervisors and those workers who are likely	
to witness a hazardous material release and	
who are required to notify proper authorities	
of the release?	
of the release:	
Does the organization make available	
emergency-related information and	
training on site-specific conditions and	
hazards to offsite personnel who may be	
required to participate in response to an	
emergency at the DOE/NNSA	
site/facility?	
Ref. DOE O 151.1 C, CRD Section 5a(1) and	
5a(2), 5a(3)	
4.2.1.1 Are initial training and periodic drills	
provide to all workers who may be required to	
take protective actions?	
Is this training required and provided when they	
are employed, when their expected protective	
actions change, or when the emergency plan	
changes?	
Ref. EC P3.10	
4.2.1.2 Is refresher training provided annually to	
certified operators and supervisors, and those	
workers who are likely to witness a hazardous	
materials release and who are required to notify	
proper authorities of the release?	
Ref. EC P3.11	

4.2.1.3 Does refresher training include details of	
program changes and lessons-learned from actual events, exercises, DOE and industry	
operating experience, and program evaluations?	
Ref. EC P3.8	
4.2.1.4 Is the emergency management training	
program effectively integrated and coordinated	
with related training programs provided by other	
organizations?	
Ref. EC P3.6	
4.2.1.5 Are employees designated and trained to	
assist in a safe and orderly evacuation of other	
employees? Is the emergency action plan	
reviewed with each employee covered by the	
plan: when the plan is developed; when the	
employee is initially assigned a job; when	
responsibilities change under the plan; and when	
the plan changes?	
Ref: 20 CFR 1910.38 (e) and (f)	
4.3.1 Has the contractor at DOE/NNSA	
Operational Emergency Hazardous Material	
Program facilities also established a	
coordinated program of training and drills for developing and/or maintaining specific	
emergency response capabilities as an	
integral part of the emergency management	
program? (The program must apply to	
emergency response personnel and	
organizations that the site/facility expects to	
respond to onsite emergencies. Emergency-	
related information must be available to	
offsite response organizations. The program	
must consist of self-study/homework,	
training, and drills.)	
Ref. DOE O 151.1 C, CRD Section 5b	
4.3.1.1 Is special team training conducted for	
functional groups, in particular those with	
technical and management team assignments?	
Ref. EC P3.13	
4.3.1.2 Does training emphasize the need for	
prompt, accurate, and practical judgments	
involving event categorization and classification,	
protective actions, and the urgency of	
notifications of Operational Emergencies (OE)?	
Ref. EC P3.14	

4.3.1.3 Is EAL training conducted periodically	
to improve the proficiency of ERO decision-	
makers in timely and conservative classification	
of OEs, including decision-making when	
information is incomplete or uncertain and for	
events and conditions that are not covered	
explicitly by the EALs?	
Ref. EC P3.14	
4.3.1.4 Do ERO personnel authorized for initial	
classification and protective action decision-	
making validate their proficiency by	
participating in performance tests that employ	
hypothetical scenarios and available facility/site	
aids, such as EALs?	
Ref. EC P3.14	
4.3.1.5 Are offsite emergency response	
personnel and organizations, including state,	
local, tribal, or private hospitals, public health,	
medical, or ambulance services, that are	
expected to support onsite response efforts,	
offered training on facility- and site-specific	
emergency-related information, conditions, and hazards?	
Are they offered the opportunity to participate in	
training and drills validating procedures for	
response activities expected to involve	
integration of onsite and offsite response resources?	
Ref. EC P3.15	
4.3.1.6 Are training program requirements in	
accordance with the National Response Plan	
(NRP) and National Incident Management	
System (NIMS)?	
Ref. EC P3.9	
4.4.1 Has both initial training and annual	
refresher training been provided for the	
instruction of and demonstration of	
proficiency by all personnel (i.e., primary	
and alternate) comprising the ERO?	
Ref. DOE O 151.1 C, CRD Section 5b(1)	
4.4.1.2 Do employees who, in the course of their	
regular job duties, work with hazardous	
materials receive training on the hazards of	
specific hazardous substances, and who will be	
called upon to provide technical advice or	
assistance at a hazardous substance release	
incident to the individual in charge, receive	
training in the area of their specialty annually?	
Ref. 29 CFR 1910.120(q)	
Noi. 49 Cl'N 1910.120(4)	

4.4.1.3 Are employees engaged in response to	
hazardous emergency situations at hazardous	
waste cleanup sites that may expose them to	
hazardous substances trained in how to respond	
to such expected emergencies?	
Ref: 29 CFR 1910.120 e	
4.4.1.4 Is training provided for each responder at	
each awareness level based on functions and	
duties to objectively demonstrate necessary	
competencies? Is annual refresher training	
provided?	
Ref: 29 CFR 1910.120 (q)	
4.4.1.5 Do trainers for hazardous material	
emergency response have recognized training	
and credentials necessary to demonstrate	
instructional skills and good command of	
subject matter?	
Ref: 29 CFR 1910.120 (q) (7)	
4.5.1 Do drills provide supervised,	
"hands-on" training for members of	
EROs?	
Ref. DOE O 151.1 C, CRD Section 5b(2)	
4.5.1.3 Do scheduled drills include scenario-	
driven events that provide interface practice	
between the emergency response organization	
and site medical and security organizations?	
Ref. P 3.17	
4.5.1.4 Are drills developed or modified based	
upon feedback from actual events, exercise	
evaluations, and self-assessments, or to validate	
new or revised procedures and equipment	
modifications?	
Ref. EC P 3.18	

3.6 Element: 5. Emergency Management Exercises

3.6.1. Description

A formal exercise program must validate all elements of an emergency management program over a 5-year period. (5.1.1)

The exercise program must validate facility- and site-level emergency management program elements by initiating response to simulated, realistic emergency events/conditions in a manner that, as nearly as possible, replicates an integrated emergency response to an actual event. (5.1.2)

Planning and preparation must use an effective, structured approach that includes documentation of specific objectives, scope, time lines, injects, controller instructions, and evaluation criteria for realistic scenarios. (5.1.3)

Each exercise must be conducted, controlled, evaluated, and critiqued effectively and reliably. (5.1.4)

Lessons-learned must be developed, resulting in corrective actions and improvements. (5.1.5)

Reference DOE Order 151.1C, Chapters III and IV and Attachment 2, Contractor Requirements Document, Section 6

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume III, Section 3, Exercises

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.6.2. Typical Compliance Problems

Inadequate training for controllers and evaluators.

Staging of props and positioning of controllers/evaluators was not complete before exercise initiation.

Scenario confidentiality was compromised--players had prior knowledge of the scenario.

Controllers prompting players.

Observers were not properly controlled and were seen talking to or assisting players.

Evaluators did not have sufficient knowledge of areas being evaluated.

Insufficient evaluator staffing of the exercise.

Approved exercise simulations were not pre-identified.

Exercise critique was not sufficiently objective and detailed.

Exercise scenario did not support demonstration of all objectives.

Evaluation criteria did not enable evaluator to determine if objectives were met.

Exercise objectives were not clearly stated, measurable, or attainable.

Objectives were not developed for all participating organizations.

3.6.3. Instructions to Evaluator:

DOCUMENT/RECORDS REVIEW	NOTES
Review the site/facility emergency plan and	
procedures for exercise planning.	
Review exercise records and the ERAP for	
compliance with requirements to conduct	
exercises and integrate results with overall	
planning and preparedness activities., exercise	
plans (EXPLANS), Exercise Evaluation	
Reports and any other related records.	

Review EXPLAN) and Exercise Evaluation	
Reports (After-Action Reports) as well as any	
Corrective Action Plans generated from	
findings.	
Resolve any issues of missing, incomplete, or	
unclear documentation in the	
interview/observation phases of the inspection.	
5.1.1 Does the site/facility have in place a	
formal exercise program to validate all	
elements of an emergency management	
program over a five-year period?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 6	
5.1.1.1 Does the formal exercise program	
include validation of elements of the emergency	
management program over a 5-year period?	
Does this include a plan (e.g. a matrix) for	
validating all the elements of each program by	
incorporating specific objectives in exercises	
over the 5-year period?	
Does the exercise program also include	
provisions for incorporating objectives in each	
exercise that are designed to validate revised	
plans/procedures, implemented corrective	
actions, and program improvements?	
Does the exercise program include provisions	
for evaluating all exercises and establish a	
critique process that includes gathering and	
documenting observations of participants?	
Ref. EC P4.1	
5.1.3 Does exercise planning and preparation	
use an effective, structured approach that	
includes documentation of specific objectives,	
scope, time lines, injects, controller	
instructions, and evaluation criteria for	
realistic scenarios?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 6	
5.1.4.1 Are provisions for safety, security, and	
public/media interface clearly identified and	
documented?	
Ref. EC CE4.12	
5.1.5 Are lessons-learned developed, resulting	
in corrective actions and improvements?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 6	
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5.3.2 Does each exercise have specific	
objectives and is it fully documented (e.g., in	
scenario packages that include objectives,	
scope, timelines, injects, controller	
instructions, and evaluation criteria)?	
Ref. DOE O 151.1C Attachment 2 (CRD),	
Sec. 6b.	
5.3.2.1 Is the scenario consistent with the set of	
exercise objectives, explicitly supporting an	
evaluation/validation of each objective?	
Ref. EC CE4.6	
5.3.7 Are annual emergency response	
exercises supported by documentation that	
contains, but is not limited to, the exercise	
scope, its objectives and corresponding	
evaluation criteria, a narrative description of	
the scenario, timeline, and a list of	
participants? Is such documentation for site	
exercises approved by the Cognizant Field	
Element?	
Ref. DOE O 151.1 C Attachment 2, CRD Sec.	
6b(4)	
5.3.7.1 Are exercises fully documented by an	
EXPLAN that includes: specific exercise	
objectives, scope, scenario, participants,	
simulations, time lines, inject messages,	
technical data, safety and security provisions,	
controller instructions, and evaluation criteria.	
Ref EC CE4.2	
5.3.7.2 Does the EXPLAN contain sufficient	
information for effective conduct, control and	
evaluation of the exercise?	
Are roles, responsibilities, and interfaces among	
exercise participants (i.e., players/responders,	
controllers, evaluators, and observers) clearly	
addressed?	
Are the provisions for exercise conduct and	
control and evaluation clearly identified?	
Are provisions for exercise evaluation clearly	
identified?	
Ref. EC CE4.4	
Observations by Evaluators	Notes
Interview personnel with responsibility for	
managing the emergency management exercise	
program. Verify applicable documentation for	
each criterion.	
Verify compliance with other DOE and non-	
DOE requirements applicable to emergency	
management exercise programs.	

Also identify any other Federal, state, tribal	
and local requirements or agreements	
pertaining to emergency training and drills	
with which the site/facility must comply.	
Provide references regarding implementation	
in adjacent columns.	
Observe conduct of an exercise. Support	
determination of compliance with exercise conduct requirements through interviews and	
review of exercise records.	
5.1.2 Does the exercise program validate	
facility- and site-level emergency	
·	
management program elements by	
initiating response to simulated, realistic	
emergency events/conditions in a manner	
that, as nearly as possible, replicates an	
integrated emergency response to an	
actual event?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 6	
5.1.2.1 Does the exercise program involve	
testing emergency response capabilities by	
initiating response to simulated, realistic	
emergency events/conditions in exercises of	
varying scope over the 5-year period? The following terminology should describe the	
exercises conducted:	
excresses conducted.	
Facility Operations-Based Exercise - A facility	
or group of facilities (i.e., with common facility-	
level ERO positions) annually tests the	
proficiency of personnel in facility-level ERO	
positions in accomplishing facility-specific	
emergency response duties and responsibilities.	
<u>Site Operations-Based Exercise</u> – Tests at least	
annually the integrated emergency response	
capabilities of personnel in facility- and site-	
level ERO positions. Includes both facility- and	
site-level evaluation and critique. For multi-	
facility sites, the basis for the exercise is rotated	
among facilities or groups of facilities.	
Full Dominimation Operations D. 15	
Full Participation Operations-Based Exercise - A	
site-level exercise is considered full participation	
if offsite organizations participate. Offsite	
response organizations are invited to participate	
in a site-level exercise at least once every 3	
years. Ref. EC P4.2	
Noi. EC F4.2	

7 1 0 0 D 1 1 1/6 11/4 1	
5.1.2.2 Does the site/facility demonstrate	
adherence to OE notification and reporting	
requirements in all emergency management	
exercises?	
Ref. DOE O 151.1C, Chapter VIII, Section 3	
5.1.2.3 Does the site/facility demonstrate	
adherence to OE notification and reporting	
requirements in the observed emergency	
management exercise? Ref. DOE O 151.1C,	
Chapter VIII, Section 3	
5.1.4 Is each exercise conducted,	
controlled, evaluated, and critiqued	
effectively and reliably?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 6	
5.1.4.2 Are simulations and limitations	
pertaining to participants and exercise activities	
clearly identified and documented?	
Ref. EC CE4.10	
5.1.4.3 Do injects/messages contain accurate,	
unambiguous, and non-prompting information	
and technical data for the players/responders and	
provide proper direction for the exercise?	
Ref. EC CE4.11	
5.1.4.4 Are provisions for safety, security, and	
public/media interface clearly identified and	
documented?	
Ref. EC CE4.12	
5.1.4.5 Does coordination among participants	
include provisions for exercise initiation,	
interruption and termination?	
Ref. EC CE4.13	
5.1.4.6 Are controllers and evaluators provided	
generic and exercise-specific training?	
Ref. EC CE4.14	
5.1.4.7 Are controllers and evaluators provided	
training on the scenario package and safety and	
security/safeguards provisions?	
Ref. EC CE4.15	
5.1.4.8 Are preparations, including participant	
briefings, safety provisions, staging of	
simulation props, positioning of	
controllers/evaluators, and establishing of initial	
conditions completed prior to exercise initiation?	
Ref. EC CE 4.16	
5.1.4.9 Is security of the exercise scenario	
properly managed, and is pre-staging of players	
and/or prior knowledge of scenario material by	
players effectively prevented?	
Ref. EC CE4.17	
IVI, IV CLTIII	

5.1.4.10 Are controller organizations adequately	
staffed and positioned for effective exercise	
conduct/control?	
Ref. EC CE4.18	
5.1.4.11 Do controllers conduct/control the	
exercise in accordance with the exercise plan	
package?	
Ref. EC CE 4.19	
5.1.4.12 Do controllers permit free play when	
free play would not interfere with the scenario?	
Ref. EC CE4.20	
5.1.4.13 Do controllers prevent interference	
and/or prompting by non-responders?	
Ref. EC CE4.21	
5.1.4.14 Is simulation of activities sufficiently	
realistic to provide confidence that the activity	
could have been performed during a real	
emergency?	
Ref. EC CE4.22	
5.1.4.15 Do players/responders perform their	
respective functions, initially and throughout the	
exercise in a professional manner as if the	
situation were an actual emergency?	
Ref. EC CE4.23	
5.2.1 Does the contractor, at a minimum,	
conduct building evacuation exercises	
consistent with Federal regulations [e.g., (41	
CFR 102-74-360)], local ordinances, and	
National Fire Protection Association	
Standards?	
Are such exercises conducted at least	
annually to ensure that employees are able to	
evacuate their work area safely?	
Ref. DOE O 151.1C Attachment 2, CRD, Sec.	
6a(1)	
5.2.2 Are communications systems with DOE	
Headquarters, the Cognizant Field Element,	
and offsite agencies tested at least annually	
(or as often as needed) to ensure that	
communications systems are operational? Ref. DOE O 151.1C Attachment 2, CRD Sec.	
6a(2)	
5.3.1 Has the contractor at DOE/NNSA	
Operational Emergency Hazardous Material	
Program facilities established a formal	
exercise program to validate all elements of	
the emergency management program over a	
5-year period?	
Ref. DOE O 151.1C Attachment 2, CRD Sec.	
Rei. BOL O 131:10 Milliamment 2, CRB Sec.	

5.3.1.1 Do specific exercise objectives provide the basis for evaluating/validating the performance of response capabilities by each participating organization? Ref. EC CE4.5 5.3.3 Are exercises evaluated? Is there an established critique process, which includes gathering and documenting observations of the participants? Are corrective action items identified as a result of the critique process incorporated into the emergency management program? Ref. DOE O 151.1C Attachment 2, CRD, Sec. 6b 5.3.3.1 Are exercise evaluation criteria facility-specific, based on existing plans and procedures, and correlated with the exercise objectives? Ref. EC CE4.7 5.3.3.2 Are notifications and communications evaluated during every exercise? Ref. EC CE4.29 5.3.3.3 Is the evaluator organization sufficiently staffed to evaluate performance and key decision-making of the responders in satisfying the exercise objectives. Ref. EC CE4.24 5.3.3.4 Do evaluators display familiarity with responder organizations, functions, procedures, and anticipated responder decisions and response activities? Ref. EC CE4.25 5.3.3.5 Are responders/players evaluated with respect to demonstrated proficiency of their responders, familiarity and use of procedures and equipment, and overall professional response? Ref. EC CE4.26 5.3.3.6 Are facilities and equipment evaluated with respect to adequacy of functions and operability? Ref. EC CE4.27 5.3.3.7 Are procedures evaluated with respect to adequacy of functions and operability? Ref. EC CE4.27 5.3.3.7 Are procedures evaluated with respect to adequacy of functions and operability? Ref. EC CE4.27 5.3.3.7 Are procedures evaluated with respect to adequacy of functions and operability? Ref. EC CE4.27 5.3.3.7 Are procedures evaluated with respect to adequacy of functions and operability?		
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their use by responders, including adequacy of	their use by responders, including adequacy of	
content?		
Ref. EC CE4.28		

5.3.3.8 Did controllers conduct a post-exercise critique to gather and document observations and solicit feedback from players/responders? Ref. EC CE4.30	
5.3.3.9 Was a formal critique process conducted by the controller/evaluator organization to determine whether individual exercise objectives were accomplished based on a synthesis of all the observations and information/data gathered during the conduct of the exercise? Ref. EC CE4.31	
5.3.4 Does the facility exercise its emergency response capability annually and include at least facility-level evaluation and critique. Are evaluations of annual facility exercises by Departmental entities (e.g., Cognizant Field Element, Program Secretarial Officer or Headquarters Office of Security and Safety Performance Assurance) performed periodically so that each facility has an external Departmental evaluation at least every three years? Ref. DOE O 151.1C Attachment 2, CRD Sec. 6b(1)	
5.3.4.1 Does the schedule of exercises include: Security scenario events in order to test the interfaces between site security and the facility/site Emergency Response Organization (ERO)? Ref. EC P4.3	
5.3.5 Do site-level ERO elements and resources participate in a minimum of one exercise annually? Is this site exercise designed to test and demonstrate the site's integrated emergency response capability? For multiple-facility sites, is the basis for the exercise rotated among facilities? Ref.: DOE O 151.1C, Attachment 2, CRD section 6b(2)	
5.3.6 Are offsite response organizations invited to participate in site-wide exercises at least once every three years? Ref: DOE O 151.1C Attach 2, CRD Sec. 6b(3)	
5.3.6.1 Is exercise planning effectively coordinated among onsite and offsite organizations or groups regarding their respective participation and exercise objectives? Are any limitations or simulations regarding their participation identified and documented? Ref. EC CE4.1	

5.3.7.3 Does the site/facility complete the exercise package and provide to DOE or NNSA line management and the DOE Director of	
Emergency Operations in sufficient time before	
the conduct of the exercise to allow for review	
and comments by DOE or NNSA line	
management and the DOE Director of	
Emergency Operations?	
Ref. EC CE4.3	
5.3.7.4 Does the scenario reflect current facility-	
specific hazards, correlate technically with the	
facility EPHA, and is it technically accurate in	
terms of operations and radiological, chemical,	
biological and meteorological data?	
Ref. EC CE4.8	
5.3.7.5 Is technical data that supports the	
scenario (e.g., operational, radiological,	
chemical, biological, medical, meteorological)	
technically accurate and clearly and	
unambiguously presented?	
Ref. EC CE4.9	
5.3.8 Are Evaluation Reports (After-Action	
Reports) for facility and site exercises	
completed within 30 working days and submitted to the Cognizant Field Element,	
the Program Secretarial Officer(s), and the	
Director, Office of Emergency Operations?	
Ref. DOE O 151.1 C Attach 2, CRD Sec.	
6b(5)	
5.3.8.1 Does an After-Action Report document	
the results of the exercise critique and	
evaluation?	
Ref. EC CE4.32	
5.3.9 Are corrective action plans developed	
within 30-working days of receipt of the final	
evaluation report? (Corrective actions must	
be completed as soon as possible. Corrective	
actions addressing revision of procedures or	
training of personnel should be completed	
before the next annual self-assessment of the	
program.)	
Ref. DOE O 151.1C, Attach 2, CRD Sec.	
6b(6)	

3.7 Element: 6. Readiness Assurance

3.7.1. Description

The emergency management Readiness Assurance Program must establish a framework and associated mechanisms for assuring that emergency plans, implementing procedures, and resources are adequate by ensuring that they are sufficiently maintained, exercised, and evaluated (including assessment and appraisal) and that appropriate and timely improvements are made in response to needs identified through coordinated and comprehensive emergency planning, resource allocation, training and drills, exercises, and evaluations. (6.1.1)

Reference DOE Order 151.1C, Chapter IV and Attachment 2, Contractor Requirements Document, Section 7

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume III, Section 4, Readiness Assurance

3.7.2. Typical Compliance Problems

Site/facility does not perform annual self-assessments of their emergency management program based on the specific standards and criteria issued by DOE HQ Office of Emergency Operations.

Site/facility does not participate in the no-notice exercise program.

Corrective action plans are not developed within 30 days of receipt of the final evaluation report, are incomplete, or have factual errors.

Corrective action plans have not been verified and validated to ensure the corrective action has been effective in addressing the original finding.

Records, such as equipment and facility test and maintenance records, staff training and qualification records, or exercise results and findings that form part of the basis for evaluation and improvement programs have factual errors, are internally inconsistent, or are not maintained current.

Emergency Readiness Assurance Plan (ERAP) is incomplete or has factual errors.

Emergency Readiness Assurance Plan (ERAP) is not updated annually or lacks necessary coordination.

3.7.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW NOTES Review documentation and records relating to the emergency management evaluation program. Review documentation and records related to the emergency management improvements program. Review training program plan and training records for information applicable to readiness assurance activities. Review exercise program planning documents and records, including exercise findings. Review ERAP and documentation of program reviews (internal and external), corrective actions, and documents that track findings and corrective actions, including a process to verify and validate results.

6.4.1 ERAP - Has the site/facility submitted an ERAP to the Cognizant Field Element by September 30 of each year? In keeping with 31 U.S.C. 1115 and 1116, did this report identify what the goals were for the fiscal year that ended, coincident with the due date for this report (e.g., September 30), and the degree to which these goals were accomplished?	
Did this report also identify the goals for the next fiscal year (e.g., which starts on October 1)? Ref: DOE O 151.1C, Attachment 2, CRD, Section 7c	
6.4.1.1 Does the ERAP highlight program status, including significant changes in emergency management programs (i.e. planning basis, organization, facility mission, exemptions) and comparison of previous ERAP goals, milestones and objectives to accomplishments? Ref. EC P5.20	
6.4.1.2 Does the ERAP identify what the program goals were for the fiscal year that ended coincident with the due date for the report and the degree to which these goals were accomplished? Does the ERAP also identify the goals for the next fiscal year? Ref. EC P5.21	
6.4.1.3 Does the ERAP document evaluation of results and the status of associated corrective actions, including site/facility self-assessments and performance measures? Ref. EC P5.22	
6.4.1.4 Does the ERAP contain a sufficient level of accurate information and analysis to provide management at all levels with adequate tools for gauging emergency management program readiness? Ref. EC P5.23	
6.4.1.5 Are accurate site (i.e. facilities consolidated into one site document) ERAPs developed and submitted to the responsible DOE Cognizant Field Elements? Ref. EC P5.24	
Observations by Evaluators	Notes
Interview individual with overall responsibility for managing the emergency management program.	

204

Interview facility emergency management	
personnel on sites with multiple facilities to	
determine effectiveness of site-wide emergency	
readiness assurance program integration.	
Also identify any other Federal, state, tribal	
and local requirements or agreements	
pertaining to readiness assurance with which	
the site/facility must comply. Provide	
references regarding implementation in	
adjacent columns.	
If possible, observe conduct of a training	
session, a drill, and an exercise. Support	
determination of compliance with readiness	
assurance requirements for these program	
areas through observations and interviews.	
6.1.1 Has the site/facility established an	
emergency management Readiness Assurance	
Program having a framework and associated	
mechanisms for assuring that emergency	
plans, implementing procedures, and	
resources are adequate by ensuring that they	
are:	
Adequately maintained, exercised, and	
evaluated (including assessment and	
appraisal)?	
And that appropriate and timely	
improvements are made in response to	
needs identified through coordinated and	
comprehensive emergency planning,	
resource allocation, training and drills,	
exercises, and evaluations?	
Ref: DOE O 151.1C, Attachment 2, CRD, Section 7	
6.1.1.1 Is there established a program for the	
identification and protection of vital records,	
those records needed by agencies for continuity	
of operations?	
Ref: 36 CFR 1236, Management of Vital	
Records, Chapter XII, Subpart A and B	
6.1.2 Has the DOE/NNSA contractor	
implemented a Readiness Assurance Program	
consisting of evaluations, improvements and	
ERAPs.	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 7	
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6.1.2.1 Has the contractor implemented an	
effective formal and structured Readiness	
Assurance Program consisting of evaluation and	
improvement programs, and documentation of	
the readiness of the emergency management	
program based on emergency planning and	
preparedness activities and the results of the	
readiness assurance program (ie. in ERAPs)?	
Ref. EC P5.1	

6.2.1 Evaluations - Self-assessments. Does the contractor conduct an annual selfassessment of their emergency management programs?

Are program and exercise evaluations (including appraisals and assessments) based on specific standards and criteria, issued by the Director, Office of Emergency Operations?

Are self-assessment results documented in the ERAP submitted to the Cognizant Field Element?

Exercise Evaluations. See Exercise Criteria.

Performance Indicators. Does the contractor site/facility participate in a program of performance indicators (including performance measures and metrics) to capture and track objective data regarding the performance of emergency management programs in key functional areas?

No-Notice Exercises. Does the Contractor site/facility participate in a program of No-Notice Exercises (NNX), conducted at the discretion of the Director, Office of Emergency Operations, to determine if the facility/site Emergency Response Organization (ERO) accomplishes selected objectives based on applicable plans, procedures, and/or other established requirements?

Is site/facility involvement limited to providing trusted agents and responding when the NNX is conducted?

Ref: DOE O 151.1C, Attachment 2, CRD, Section 7a

6.2.1.1 Does the evaluation program assure that emergency plans, implementing procedures, and resources are adequate and sufficiently maintained, exercised, and evaluated. Ref. EC P5.2	
6.2.1.2 Self-evaluations:	
Is a self-assessment of the emergency management program conducted periodically by the facility or activity?	
Are findings (i.e. weaknesses or	
deficiencies) identified in all program and	
exercise evaluations?	
exercise evaluations?	
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Are records maintained of readiness	
assurance self-evaluations (eg. program or	
exercise self-assessments) and any related	
findings?	
Ref. EC P5.4	
6.2.1.3 Are formal evaluation reports	
prepared that document evaluation results	
and specific findings?	
Ref. EC P5.6	
6.2.1.4 Does the site use performance	
indicators (including performance measures	
and metrics) to capture and track objective	
data regarding the performance of	
emergency management programs in key	
functional areas?	
Are the results shared with the Cognizant	
field element and Director Office of	
Emergency Operations?	
Ref. EC P5.7	
6.2.1.5 Does the site participate in NNX	
conducted at the discretion of the Director,	
Office of Emergency Operations, to	
determine if the ERO accomplishes selected	
objectives based on applicable plans,	
procedures, and/or other established	
requirements, and is site involvement	
limited to providing trusted agents and	
responding when the exercise is conducted?	
Ref. EC P5.8	

6.2.1.6 External evaluations:

Are evaluation schedules coordinated with all involved organizations to minimize impacts and maximize benefits?

Are evaluations schedules forwarded to the Doe HQ Director of Emergency Operations?

Does the facility or activity makes available personnel responsible for developing or maintaining the emergency management program as well as associated program documentation during periodic external evaluations?

Are findings (i.e. weaknesses or deficiencies) identified in all external program and exercise evaluations?

Are evaluated findings from program and exercise evaluations acknowledged with an established time period of receipt of the findings and do they include a corresponding corrective action plan?

Ref. EC P5.5

6.3.1 Improvements - Corrective Actions. These requirements supplement those in the CRD to DOE O 414.1A, *Quality Assurance*. Continuous improvement in the emergency management program results from implementation of corrective actions for findings (e.g., deficiencies, weaknesses) in all types of evaluations, including both internal and external evaluations.

Are corrective action plans developed within 30-working days of receipt of the final evaluation report?

Are corrective actions completed as soon as possible? Corrective actions addressing revision of procedures or training of personnel should be completed before the next annual self-assessment of the program.

Does completion of corrective actions include a verification and validation process, independent of those who performed the corrective action, that verifies that the corrective action has been put in place, and validates that the corrective action has been effective in resolving the original finding?

See Exercise Criteria for corrective actions related to findings from exercise evaluations.

Does the readiness assurance program include a system for incorporating and tracking lessons learned from training, drills, actual responses as well as a site-wide lessons learned program?

Does the site/facility participate in the DOE/NNSA Corporate Lessons Learned Program?

Ref: DOE O 151.1C, Attachment 2, CRD, Section 7b

6.3.1.1 Has the site/facility established an improvement program that provides assurances that appropriate and timely improvements are made in the emergency management program in response to needs identified through coordinated emergency planning, resource allocation, program assistance activities, evaluations, training, drills, and exercises?

Ref. EC P5.9

6.3.1.2 Does continuous improvement in the emergency management program result from implementation of corrective actions for findings	
in all types of evaluations, including both self-assessments and external evaluations?	
Ref. P5.10	
6.3.1.3 Are evaluated findings from program and	
exercise evaluations by organizations external to	
the facility acknowledged and include	
corresponding corrective action plans?	
Ref. EC P5.11	
6.3.1.4 Are corrective action plans developed	
within 30 working days of receipt of the final	
evaluation report?	
Ref. EC P5.12	
6.3.1.5 Are corrective actions completed as soon	
as possible and are corrective actions addressing	
revision of procedures or training of personnel	
completed before the next annual self-	
assessment of the program? Ref. EC P5.13	
6.3.1.6 Does completion of corrective actions	
include a verification and validation process,	
independent of those who performed the	
corrective action, that verifies that the corrective	
action has been put in place, and does it validate	
that the corrective action has been effective in	
resolving the original finding?	
Ref. EC P5.14	
6.3.1.7 Is closure of findings from program and	
exercise evaluations by organizations external to	
the facility validated by the evaluating	
organization?	
Ref. EC P5.15	
6.3.1.8 Do improvement programs prepare	
corrective action plans and establish and	
maintain a tracking system to monitor and verify	
correction of findings from all program and	
exercise evaluations, or from actual responses?	
Ref. EC P5.16	
6.3.1.9 Does the improvement program include a	
system for incorporating and tracking lessons	
learned from training, drills, actual responses,	
and a site-wide lessons learned program?	
Ref. EC P5.17	

6.3.1.10 Does an established improvement	
program ensure that relevant lessons learned (i.e.	
complex-wide; other non-DOE sources) are	
received at the facility, are reviewed for	
applicability, and incorporated in the emergency	
management program as appropriate?	
Ref. EC P5.18	
6.3.1.11 Does the site have an effective and	
reliable improvement program that is ensured	
through sustained management commitment to	
continuous improvement of the emergency	
management program?	
Ref. EC P5.19	

3.8 Element: 7. Emergency Response Organization

3.8.1. Description

An Emergency Response Organization (ERO), a structured organization with overall responsibility for initial and ongoing emergency response and mitigation, must be established and maintained for each facility/site. The ERO must establish effective control at the scene of an event/incident and integrate ERO activities with those of local agencies and organizations that provide onsite response services. An adequate number of experienced and trained personnel, including designated alternates, must be available on demand for timely and effective performance of ERO functions. (7.1.1)

Reference DOE Order 151.1C, Chapter IV and Attachment 2, Contractor Requirements Document, Section 8

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 1, Emergency Response Organization

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.8.2. Typical Compliance Problems

The ERO chain of command between the Emergency Director and the Incident Commander is not fully documented. This may cause delay and/or confusion in responding to and mitigating an event.

ERO staffing and organization are not analyzed and updated when changes occur in the hazards surveys and assessments. This may cause either over- or understaffing of key positions.

The ERO is not adequately trained and has not been adequately tested in drills in exercises, resulting in a lack of proficiency in conducting emergency response operations.

Personnel who receive initial notifications of an event in progress are slow in categorizing and classifying the event, resulting in a delay in applying adequate response resources to mitigate the event, and a delay in determining and implementing protective actions/recommendations.

ERO resources identified in planning are shown to be inadequate for response to actual or simulated emergency events.

ERO operations are not coordinated fully on and off-site, resulting in a shortfall in resources, duplication of effort, or poorly coordinated response operations.

NIMS/ICS integration, on- and off-site is inadequate or poorly coordinated.

3.8.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW Review the site/facility emergency planning hazards survey and assessment, emergency plan, and emergency plan implementing procedures. Review memoranda or agreements with offsite response organizations that may have a role in a response to an operational emergency. Review ERO rosters, including both primary and alternates. Review training program plan and training records to verify ERO preparedness activities.

Review exercise program planning documents	
and records to verify ERO participation and	
performance.	
Review ERAP and documentation of program	
reviews (internal and external), corrective	
actions, and documents that track findings and	
corrective actions related to ERO performance.	
Observations by Evaluators	Notes
Interview individual with overall responsibility	
(Program Administrator) for managing the	
emergency management program, as well as	
those managers delegated individual	
responsibility for activities within the	
emergency management program, such as the	
Training Program Manager and Exercise	
Program Manager. Verify applicable	
documentation for each criterion.	
Interview facility emergency management	
personnel on sites with multiple facilities to	
determine effectiveness of site-wide program	
integration for ERO effectiveness.	
Verify compliance with other DOE and non-	
DOE requirements applicable to emergency	
management program ERO.	
Also identify any other Federal, state, tribal	
and local requirements or agreements	
pertaining to ERO with which the site/facility	
must comply. Provide references regarding	
implementation in adjacent columns.	
Observe conduct of training and drills, and an	
exercise. Support determination of compliance	
with program administration requirements for	
these program areas through observations and	
interviews.	

7.1.1 Has the site/facility established and maintained an ERO, a structured organization with overall responsibility for initial and ongoing emergency response and mitigation, for each facility/site?	
Does the ERO establish effective control at the scene of an event/incident and integrate ERO activities with those of local agencies and organizations that provide onsite response services?	
Are an adequate number of experienced and trained personnel, including designated alternates, available on demand for timely and effective performance of ERO functions? Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 8	
ERO Organization	
7.1.1.1 Is the organizational configuration of the ERO based on actual or potential emergency conditions. Ref. EC P/E6.1	
7.1.1.2 Are ERO requirements organized and implemented in accordance with DOE O 151.1 Attachment 2 Section 8? Ref: DOE O 151.1C, Attachment 2, CRD, Section 8	
7.1.1.3 Does the management structure of the response facility provide for collection and dissemination of accurate data, setting priorities,	
assigning work to functional groups, and keeping key emergency response staff abreast of emergency response status? Ref. EC P/E6.2	
ERO Activation and Staffing	
7.1.1.4 Is ERO activation is based on actual or potential emergency conditions? Ref. EC P/E6.7	

7.1.1.5 Does the site/facility ensure personnel	
availability on demand, ERO functions, the	
ongoing, standby staffing of ERO emergency	
facility positions and response teams is	
effectively accomplished:	
Using a technique such as duty-cycle or static	
roster to ensure that qualified personnel are	
available on-demand and properly assigned?	
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Ensuring that sufficient trained personnel for	
initial and ongoing response, including	
designated alternates, are candidates for call-	
up in each functional area?	
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Periodically reviewing ERO rosters for	
accuracy?	
Periodically reviewing and updating ERO	
personnel qualifications?	
Ref. EC P6.42	
7.1.1.6 Are communication systems used to	
activate both on shift and off shift emergency	
response personnel periodically tested to ensure	
their adequacy and reliability?	
Ref. EC P6.43	
7.1.1.7 Are initial response functions performed	
by on shift operations staff?	
Ref. EC P/E 6.8	
7.1.1.8 Is the ERO functionally staffed and	
activated in a timely manner?	
Are key emergency response facilities	
operational within an hour after declaration of an	
operational emergency?	
Ref. EC P/E6.9	
7.1.1.9 Is staffing of ERO positions following	
declaration of an operational emergency orderly,	
controlled and verifiable:	
controlled and verifiable.	
Do personnel gain access to response stations	
without impediment?	
without impediment.	
Are non-ERO personnel excluded from	
emergency response work areas?	
emergency response work areas.	
Are individuals in key response positions	
readily identifiable by other ERO staff?	
Ref. FC P/F6 10	

7.1.1.10 Are procedures and/or checklists	
describing major activation and initial response	
activities of the ERO members used?	
Ref. EC P/E6.11	
ERO Makeup and Proficiency	
7.1.1.11 Are all personnel needed to perform	
duties, beyond those specified by 29 CFR	
1910.120 for the first responder awareness level,	
during a response to any of a broad range of	
emergencies defined in the Hazards Survey or	
EPHA considered members of the ERO?	
Ref. EC P/E6.38.	
7.1.1.12 Are fully trained personnel assigned to	
facility and site level ERO positions to ensure	
adequate staffing for emergency response?	
Ref. EC P6.39	
7.1.1.13 Do all personnel assigned to facility and	
site level ERO positions demonstrate their	
proficiency in assigned positions through	
periodic participation in an exercise, an	
evaluated drill, or an actual response?	
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Do all primary and alternate personnel	
accomplish this participation on a rotating basis?	
Ref. EC P6.40	
7.1.1.14 Are an adequate number of experienced	
and trained personnel for initial and ongoing	
response, including designated alternates,	
available on demand for timely and effective performance of ERO functions?	
Ref. EC P6.41	
ERO Transitions	
7.1.1.15 Is the order of succession of	
management personnel responsible for	
managing the emergency in the absence of the	
primary designated emergency director clearly	
designated/implemented? Ref. EC P./E6.12	
7.1.1.16 Have extended operations been	
anticipated and planned for?	
Ref. EC P/E6.13	
7.2.1 The contractor at all DOE/NNSA	
facilities must assign an individual (e.g.,	
building or facility manager or similar	
position) to manage and control all aspects of	
the site/facility response.	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 8a	

7.2.1.1 Is an individual trained to recognize,	
categorize and classify events and to conduct	
appropriate notifications available 24 hours a	
day, 7 days a week?	
Is this individual's authority unambiguous and	
clearly communicated throughout the ERO? Ref.	
EC P/E6.32	
7.2.1.2 Is an Emergency Director or equivalently	
titled individual in charge of the overall	
response, with authority to use necessary	
resources to mitigate the emergency?	
Ref. EC P/E6.3	
7.2.1.3 Does the Emergency Director have	
authority and responsibility to perform required	
functions, including initial activation of onsite	
response assets, notification of offsite	
authorities, and requests for offsite assistance, in	
accordance with the National Response Plan	
(NRP) and the National Incident Management	
System (NIMS)?	
Ref. EC P/E6.4	
7.2.1.4 Is the division of authority and	
responsibility between the incident commander	
and emergency director positions clearly	
established and maintained?	
Ref. EC P/E6.5	
7.2.1.5 Is control of operations, monitoring and	
repair teams clearly vested in a single ERO	
position or clearly defined between multiple	
ERO positions?	
Ref. EC P/E6.6	
ERO Operations/Management	
7.2.1.6 Does the emergency director adequately	
and effectively perform assigned functions,	
utilizing sufficient and practical knowledge of	
the affected facility and its operations, the	
emergency response team and its mission, and	
available tools and resources necessary to affect	
appropriate response and mitigate the	
emergency?	
Ref. EC P/E6.14	
7.2.1.7 Is the transfer of a command and control	
function to another emergency facility, within an	
emergency facility, or to a command external to	
the ERO or Incident Command System (ICS)	
completed in an orderly and formal manner and	
are ERO personnel are informed of the transfer?	
Ref. EC P/E6.15	

7.2.1.8 Does the fully staffed ERO establish	
effective internal and external interfaces with	
other agencies and organizations? External	
interfaces may include: local, state, tribal and	
federal agencies, and non-governmental groups	
such as concerned citizens and the media.	
Ref. EC P/E6.16	
7.2.1.9 Is an individual in the ERO assigned	
liaison responsibilities for coordinating with	
offsite agencies to ensure that effective	
communications are initiated and maintained	
during an emergency?	
Ref. EC P/E6.17	
7.2.1.10 Do members of the ERO:	
7.2.1.10 Bo members of the Erro.	
Perform roles, functions, and interfaces and in	
their use of emergency equipment, facilities,	
and resources in a timely, effective and	
efficient manner?	
Ciriotone manner:	
Clearly acknowledge and understand	
authorities and responsibilities?	
authornes and responsionnes:	
Identify and access available response	
resources and as appropriate, take account of	
resource limitations and specific capabilities?	
Ref. EC P/E6.18	
7.2.1.11 Based on current knowledge of the	
situation, do the responsible ERO operations and	
technical support staff determine and implement	
a reasonable, well-planned course of action	
within their sphere of responsibility? Ref. EC	
P/E6.19	
7.2.1.12 When priority actions are identified, is	
* * * * * * * * * * * * * * * * * * * *	
tasking clearly made to emergency response	
staff and are actions followed through to	
completion? Ref. EC P/E6.20	
7.2.1.13 Do specialty groups supporting the	
response staff provide timely information to	
decision-making process?	
Ref EC P/E6.21	
7.2.1.14 Is adequate data obtained and analyzed	
to support operations staff in assessing and	
mitigating emergency events?	
Ref. EC P/E6.22	
7.2.1.15 Is information accurately and efficiently	
transmitted in an orderly and documented	
manner throughout the chain of command and	
between/within emergency facilities?	
Ref. EC P/E6.23	

204

7.2.1.16 Is the use of acronyms, code words,	
convention and technical terminology addressed	
to ensure no misunderstandings related to	
response and associated data?	
Ref. EC P/E6.24	
7.2.1.17 Are periodic briefings provided on	
status of the emergency and current significant	
response priorities and activities?	
Ref. EC P/E6.25	
7.2.1.18 Are communications maintained with	
and is information provided regularly to DOE	
HQ emergency management team?	
Ref. EC P/E6.26	
(For DOE/NNSA Assets (as applicable))	
7.2.1.19 Does ERO management effectively	
coordinate state and DOE site requests for use of	
DOE/NNSA assets?	
Ref. EC P/E6.27	
7.2.1.20 Is an individual assigned liaison	
responsibilities with personnel representing	
DOE/NNSA assets involved in response to	
coordinate logistics, ensure that effective	
communications are initiated and maintained,	
and ensure that data exchanged using consistent	
units of measure?	
Ref. EC P/E6.28	
7.2.1.21 Are ERO personnel provided with	
adequate briefings on safety, operations,	
communications and hazards before being	
deployed?	
Ref. EC P/E6.29	
7.2.1.22 Is a Safety Officer designated and	
provided authority and responsibilities in	
accordance with this referenced requirement?	
Ref: 29 CFR 1910.120 (q))	
7.2.1.23 Are ERO teams debriefed upon return	
from assigned missions and their	
accomplishments, failures, exposures, and status	
information are recorded and made available to	
other teams and emergency facilities?	
Ref. EC P/E6.30	
7.2.1.24 Does the responsible individual	
*	
properly authorize emergency response	
personnel to receive exposures in excess of site administrative limits or other Federal criteria for	
carrying out lifesaving or other emergency	
activities, when required?	
Ref. EC P/E6.31	
Hazmat survey, sampling, and sample analysis	
teams	

7.2.1.25 Do teams implement survey and	
sampling procedures in a timely manner:	
Are field teams provided with adequate	
monitoring equipment and personal protective	
equipment (PPE) to accomplish field monitoring	
and plume tracking within and beyond the EPZ?	
and prome trucking wram and so you are Er 2.	
Do teams correctly use protective equipment?	
Ref. EC P/E6.34.1	
7.2.1.26 Is the required equipment adequate,	
accessible, functional and calibrated?	
Ref. EC P/E6.34.2	
7.2.1.27 Do teams make effective use of maps or	
general arrangement drawings showing pre-	
determined and potential monitoring points?	
Ref. EC P/E6.34.3	
7.2.1.28 Are teams briefed on facility and	
meteorological conditions and exposure control	
procedures before deployment and when	
changes occur?	
Ref. EC P/E 6.34.4	
7.2.1.29 Do teams maintain effective	
communications to transmit accurate and timely	
readings and results to their team coordinator?	
Ref. EC P/E6.34.5	
7.2.1.30 Are field teams well-directed and	
effectively controlled by emergency response	
management who:	
Provide directions to survey specific areas?	
Provide directions to minimize hazardous	
material exposure by exiting high airborne	
and whole body dose areas or high	
concentration areas, when not actively	
engaged in sample and survey activities?	
Set exposure limits for survey and tracking	
teams, and solicit and record survey results?	
Ref. EC P/E6.34.6	
7.2.1.31 Do teams utilize proper survey	
equipment and log results accurately?	
Ref. EC P/E6.34.7	
7.2.1.32 Do teams collect samples, bag and mark	
them, and log results accurately and efficiently?	
Ref. EC P/E6.34.8	
101. LC 1/L0.37.0	

7.2.1.33 Are samples received, properly	
packaged, and labeled with information such as	
sample time and date, sample location,	
volumetric data, sample media, and sample or	
survey collection person's name?	
Ref. EC P/E6.34.9	
7.2.1.34 Are analysis procedures and equipment	
used to support processing of samples received,	
either properly analyzing the samples in the field	
or transporting them to a laboratory? Ref. EC	
P/E6.34.10	
7.2.1.35 Are analysis results promptly and	
accurately communicated to other emergency	
response organizations?	
Ref. EC P/E6.34.11	
Security Staff	
7.2.1.36 Are security procedures of protective	
forces for carrying out responsibilities during	
response to OEs promptly, safely, efficiently and	
effectively implemented?	
Ref. EC P/E6.35.1	
7.2.1.37 Is an ICS implemented for security	
emergencies in accordance with NIMS/ICS	
requirements?	
Ref. EC P/E6.35.2	
7.2.1.38 Is the response of protective force	
personnel and equipment characterized by	
effective command and control?	
Ref. EC P/E6.35.3	
7.2.1.39 Is access and egress control quickly and	
properly maintained for site/facility, and	
impacted areas and emergency response	
facilities?	
Ref. EC P/E6.35.4	
7.2.1.40 Do security practices facilitate timely	
movement and access of site/facility operating	
and response personnel (including offsite	
personnel) to required areas during emergency	
situations?	
Ref. EC P/E6.35.5	
7.2.1.41 Under emergency conditions, are	
material accountability and protection for	
Special Nuclear Material and other critical DOE assets handled in a timely and effective manner?	
Ref. EC P/E6.35.6	
7.2.1.42 Is common protocol for local law	
enforcement backup of the onsite security force	
used? (e.g. Use of deadly force, weapons	
employment, tactics, code words, radio	
frequencies, etc.)	
Ref. EC P/E6.35.7	
204	

3-64

7.2.1.43 Does a mutual understanding of	
authorities and responsibilities, response plans,	
utilization of command and control facilities,	
and terminology enable site security to	
effectively coordinate and correlate response	
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activities with other components of the ERO?	
Ref. EC P/E6.35.8	
Fire/Rescue	
7.2.1.44 Are fire/rescue personnel and	
equipment assembled and deployed to the scene	
of the emergency in a safe and timely manner?	
Ref. EC P/E6.36.1	
7.2.1.45 Do fire/rescue personnel take necessary	
precautions for contamination, exposure, heat	
and personal safety?	
Ref. EC P/E6.36.2	
7.2.1.46 Are search and rescue operations	
carried out in an efficient manner, coordinating	
their efforts with medical, industrial hygiene	
(IH), and health physics (HP) personnel?	
Ref. EC P/E6.36.3	
7.2.1.47 Are injured personnel properly	
extricated, immobilized and moved during	
search and rescue operations?	
Ref. EC P/E6.36.4	
7.2.1.48 When responding onsite, are both onsite	
and offsite fire personnel outfitted with the	
appropriate specialized equipment and supplies	
specific to the onsite hazards?	
Ref. EC P/E6.36.5	
Repair/Maintenance	
7.2.1.50 Are facility and field repair and	
maintenance activities are carried out in a timely	
The state of the s	
and efficient manner?	
Ref. EC P/E6.37.1	
7.2.1.51 Are proper tools available for repair and	
maintenance activities and the procurement of	
replacement parts is expedited?	
Ref. EC P/E6.37.2	
7.2.1.52 Are emergency work order procedures	
used and is emergency tagging implemented?	
Ref. EC P/E6.37.3	
7.2.1.53 Do repair and maintenance activities	
include personnel protection and monitoring as	
well as coordination with support groups, such	
as HP, IH and chemistry personnel?	
Ref. EC P/E6.37.4	

7.3.1 Does the contractor at DOE/NNSA	
Operational Emergency Hazardous Material	
Program facilities establish and maintain an	
ERO for each site/facility with overall	
responsibility for the initial and ongoing	
response to and mitigation of an emergency?	
Is control at the event/incident scene	
consistent with the NIMS/ICS, which	
integrates local agencies and organizations	
that provide onsite response services?	
Ref: DOE O 151.1C, Attachment 2, CRD,	
Section 8b	
7.3.1.1 Is an Incident Commander in charge at	
the event scene?	
Is control and coordination at the event/incident	
scene consistent with the NRP and the NIMS/	
ICS, which integrates local agencies and	
organizations that provide onsite response	
services?	
Is the ICS identified in the emergency plan and	
memoranda of understanding/agreement with	
local response organizations?	
Ref. EC P/E6.33.1	
7.3.1.2 Is the ICS organized in the five major	
functional areas of NIMS/ICS (Command,	
Operations, Planning, Logistics, and Finances	
and Administration)?	
Ref. EC P/E6.33.2	
7.3.1.3 Is the incident assessed and priorities	
established with life saving, safety, and incident	
stabilization receiving top priority?	
Ref. EC P/E6.33.3	
7.3.1.4 Are incident command strategic goals	
and tactical objectives clear and is a flexible	
action plan implemented?	
Ref. EC P/E6.33.4	
7.3.1.5 Does the incident command evolve from	
providing oral direction to the development of a	
written Incident Action Plan (IAP)?	
Ref. EC P/E6.33.5	
7.3.1.6 Does the incident command staff	
continually assess the situation, develop a	
mitigation strategy, and request additional assets	
as needed?	
Ref. EC P/E6.33.6	
7.3.1.7 Does incident command coordinate	
internal and external response assets in an	
effective manner?	
Ref. EC P/E6.33.7	
NCI. EU F/EU.33./	

7.3.1.8 Is an ICS command post strategically located in a safe area where command control may take place safely and effectively? Ref. EC P/E6.33.8	
7.3.1.9 Is command post and staging area	
habitability periodically assessed and moved as	
necessary for safety purposes?	
Ref. EC P/E6.33.9	
7.3.1.10 Does incident command staff ensure	
that response personnel take necessary	
precautions for personal safety and	
contamination control as follows:	
Incident command staff establishes a staging area where arriving asset personnel are briefed, communication are checked, special equipment is issued and assets are deployed upon request?	
Asset personnel being released are debriefed; personnel are accounted for; personnel and equipment are surveyed for contamination; decontaminated as necessary; and issued equipment is returned? Ref. EC P/E6.33.10	
7.3.1.11 Are responsibilities of Incident	
Command carried out in accordance with this	
reference requirement?	
Ref: 29 CFR 1910.120(q)(3))	

3.9 Element: 8. Offsite Response Interfaces

3.9.1. Description

Effective interfaces must be established and maintained to ensure that emergency response activities are integrated and coordinated with the Federal, tribal, state, and local agencies and organizations responsible for emergency response and protection of the workers, public, and environment. (8.1.1)

Reference DOE Order 151.1C, Chapter IV and Attachment 2, Contractor Requirements Document, Section 9

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 2, Offsite Response Interfaces

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.9.2. Typical Compliance Problems

Needed interfaces with offsite response organizations are not established or maintained.

Coordination for response to certain site/facility hazards is non-existent or ineffective, such as evacuating contaminated injured persons, resulting in the inability for the offsite response organization to provide needed support.

Communications and emergency notifications systems and protocols are poorly coordinated resulting in degraded emergency communications capabilities.

Emergency equipment and interoperability issues have not been coordinated, resulting in poor integration of response operations.

Procedures in place for the communication of protective action recommendations are poorly understood or not practiced, resulting in diminished public safety.

Offsite responders are not offered opportunities to participate in site/facility emergency preparedness activities, including training, drills, and exercises.

Emergency public information is not coordinated between the site and offsite response organizations.

3.9.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW NOTES Review the site/facility emergency planning hazards survey and assessment, emergency plan, and emergency plan implementing procedures. Review memoranda or agreements with offsite response organizations that may have a role in a response to an OE. Review training program plan and training records to determine offsite responders' participation in preparedness activities. Review exercise program planning documents and records to determine offsite response organizations' exercise participation. Review ERAP and documentation of program reviews (internal and external), corrective actions, and documents that track findings and corrective actions related to ORI agreements, or other ORI issues.

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Resolve any issues of missing, incomplete, or	
unclear documentation in the	
interview/observation phases of the inspection.	
8.1.1.1 Are agreements to provide mutual	
assistance to or to receive assistance from offsite	
organizations documented in formal MOAs or MOUs?	
Are they accessible in the emergency plan and	
maintained current through periodic reviews?	
Ref. EC P7.17	
Observations by Evaluators	Notes
Interview individual with overall responsibility	
(Program Administrator) for managing the	
emergency management program, as well as	
those managers delegated individual	
responsibility for ORI activities within the	
emergency management program. Verify	
applicable documentation for each criterion.	
Interview facility emergency management	
personnel on sites with multiple facilities who	
have management roles with respect to ORI to	
determine effectiveness of site-wide program	
integration for ORI effectiveness.	
Verify compliance with other DOE and non-	
DOE requirements applicable to emergency	
management program ORI.	
Also identify any other Federal, state, tribal	
and local requirements or agreements	
pertaining to ORI with which the site/facility	
must comply. Provide references regarding	
implementation in adjacent columns.	
If possible, observe conduct of training and	
drills, as well as an exercise. Support	
determination of compliance with ORI	
requirements for these program areas through	
observations and interviews.	
If possible, have representatives from offsite	
response organizations having agreements or	
understandings with the site/facility join the	
meetings with site/facility representatives to	
obtain their input and feedback.	
8.1.1 Have effective interfaces been	
established and maintained to ensure that	
emergency response activities are integrated	
and coordinated with the Federal, tribal,	
state, and local agencies and organizations	
responsible for emergency response and	
protection of the workers, public, and	
environment?	
Ref: DOE O 151.1C Attachment 2, Section 9	
204	

204

8.1.1.2 Is an individual(s) with appropriate	
authority, knowledge and training responsible	
for establishing and maintaining ongoing and	
effective interfaces with offsite political,	
technical, security and emergency services	
officials?	
Ref. EC P7.16	
8.1.1.3 Are interfaces with tribal, state and/or	
local authorities responsible for protection of the public and the environment identified and	
established?	
Ref. EC P/E7.1	
8.1.1.4 Is support requested, as required, from	
Federal, tribal, state and/or local response	
agencies and organizations responsible for	
augmenting site resources in response to an	
onsite emergency event?	
Ref. EC P/E7.2	
8.1.1.5 Does the site/facility, through formal	
agreements, support offsite agencies under the	
"good neighbor" policy in areas of emergency	
assistance including: fire, medical and Hazmat	
releases (including field monitoring resources).	
Ref. EC P7.20	
8.1.1.6 Are offsite authorities informed of the	
availability of assistance from DOE or NNSA	
national assets, and,	
Do subsequent requests for support result in	
activation of the applicable assets?	
Ref. EC P/E7.3 8.1.1.7 Does a mutual understanding of	
capabilities, especially command and control	
systems, support integrated and effective	
response?	
Ref. EC P/E7.11	
8.1.1.8 Does an effective working relationship	
exist between offsite officials and their ERO	
counterparts?	
Ref. EC P/E7.12	
8.1.1.9 Is the site/facility emergency response	
plan compatible and integrated with the disaster,	
fire and/or emergency response plans of local,	
state, and federal agencies?	
Ref: Title 29 CFR 1920.120, Hazardous Waste	
Operations and Emergency Response, (1)(2)(iii)	

8.1.1.10 Does the site facility provide a	
representative to a local emergency planning	
committee (for facilities subject to the	
requirements of SARA title III)?	
Ref: U. S. Code, Title 42, The Public Health and	
Welfare, Chapter 116, Subchapter I, Emergency	
Planning and Notification, Section 11001, c	
8.1.1.11 Has the facility appointed an emergency	
response coordinator who will work with the	
LEPC on developing and implementing the local	
emergency plan? Ref: 40 CFR 355.30(c)	
8.1.1.12 Have organizations which may be	
needed in a <u>supporting role</u> and/or needed <u>for</u>	
long-term support been identified?	
	!
Have predesignated offsite points of contact,	
including organization, names, and phone	
numbers been documented, maintained, and	
made available to the response organization?	
Ref: EC P7.24	
8.1.1.13 Are offsite response agencies and	
organizations provided with specific information	
and/or offered training on the nature and	
characteristics of the biological agents and/or	
toxins present at the DOE/NNSA biosafety	
facility?	
Ref. EC P7.18	
8.1.2 Does the contractor at the DOE/NNSA	
facility coordinate with state, tribal, and local	
agencies and organizations responsible for	
offsite emergency response (e.g., "911"	ļ
emergencies) and for protection of the health	
and safety of the public?	
Ref: DOE O 151.1C Attachment 2, Section 9	
8.1.2.1 Is effective coordination with offsite	
response agencies and organizations	
accomplished and maintained through routinely	
scheduled meetings.	
Ref. EC P7.19	
8.1.2.2 Does coordination and integration with	
offsite response agencies and organizations	
follow established, prearranged and documented	
plans and protocols, including, responsibilities	
and authorities, coordination of response,	
notification, facility activation, communications,	
EOC interfaces, PIO activities, and logistic	
protocols?	
Ref. EC P/E7.13	

8.1.2.3 Does routine coordination and interfaces	
through training, drills and good neighbor	
support ensure that offsite services as indicated	
in documented agreements will be integrated	
with onsite resources?	
Ref. EC P21	
8.1.2.4 Are planned response functions to be	
provided by offsite organizations periodically	
tested and verified?	
Ref. EC P/E7.22	
8.1.2.5 Are methods of communication and	
communication protocols with offsite	
agencies/organizations in place, identified and	
operable?	
Ref. EC P/E7.4	
8.1.2.6 Do communication capabilities allow	
effective communication with offsite officials,	
the cognizant DOE Field Element and	
Headquarters Emergency Management Team?	
Ref. EC P/E7.5	
8.1.2.7 Are offsite officials briefed upon	
activation of their respective facilities?	
Ref. EC P/E7.6	
8.1.2.8 Are offsite agencies/organizations	
responsible for emergency response and for	
protection of workers, public environment	
provided initial and ongoing information	
sufficient to perform their respective functions?	
Ref. EC P/E7.7	
8.1.2.9 Does timely, clear, accurate, and effective information exchange occur between	
the ERO and offsite personnel? Ref. EC P/E7.8	
8.1.2.10 Does mutual understanding of	
acronyms, code words, conventions and/or	
technical terminology provide effective	
information exchange?	
Ref. EC P/E7.9	
8.1.2.11 Are incoming offsite agency	
inquiries/concerns directed to the appropriate	
personnel for resolution?	
Ref. EC P/E7.10	
8.1.2.12 Are provisions in place and	
implemented with state, tribal and local agencies	
and organizations for coordinating release of	
information about the emergency to the public?	
Ref. EC P/E7.14	

8.1.2.13 Is there mutual understanding of	
response measures to be implemented by the	
facility/site in anticipation of the involvement of	
local and state public health agencies or	
agricultural authorities following an actual or	
potential release of a biological hazardous	
material?	
Ref. EC P/E7.15	
8.1.2.14 Are offsite response organizations	
invited to participate in a site-level exercise at	
least every 3 years?	
Ref. EC P7.23	

3.10 Element: 9. Emergency Facilities and Equipment

3.10.1. Description

Facilities and equipment adequate to support emergency response must be available, operable, and maintained. At a minimum, facilities must include an adequate and viable command center. Equipment must include, but not be limited to, personnel protective equipment, detectors, and decontamination equipment. (9.1.1)

Reference DOE Order 151.1C, Chapter III and IV, and Attachment 2, Contractor Requirements Document, Section 10

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 3
Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D,
Evaluation Criteria

3.10.2. Typical Compliance Problems

The site/facility does not have adequate equipment and supplies to meet then needs determined by the result of the emergency planning hazards assessment (EPHA).

The command center (or EOC) design and operation does not support effective emergency response based on analysis of emergency response needs, or does not support extended operations under accident conditions derived from the EPHA.

Emergency equipment and decision-support tools do not support timely initial assessments of the consequences of potential emergency events and conditions.

Emergency warning systems are not functional, inadequate, or not regularly tested.

Primary and/or backup equipment systems are inadequate to ensure that timely and accurate emergency notifications are made.

Equipment and systems in place to support site/facility personnel accountability procedures are inadequate to ensure timely and accurate determination of personnel accountability during an emergency.

Periodic inspections, operational checks, calibration, preventive maintenance and testing of equipment and supplies are not carried out as required in accordance with manufacturer's instructions or industry standards, resulting in diminished readiness.

3.10.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW NOTES Review the site/facility emergency planning hazards survey and assessment, emergency plan, and emergency plan implementing procedures. Review ERAP and documentation of program reviews (internal and external), corrective actions, and documents that track findings and corrective actions related to emergency facilities and equipment (EFE) issues. Review memoranda of agreement or understanding among the site, local jurisdictions and the state regarding shared use of equipment and facilities, standardization issues, and access control.

Review results of exercises, internal and external assessments, and corrective action plans that may delineate EFE issues and their status or resolution. Review vulnerability analysis (for facilities of interest; note: may be classified) Resolve any issues of missing, incomplete, or unclear documentation in the interview/observation phases of the inspection. Observations by Evaluators Notes Notes Interview individual with overall responsibility (Program Administrator) for managing the emergency management program, as well as those managers delegated individual responsibility for emergency facilities, such as command centers, within the emergency management program. Verify applicable documentation for each criterion. Interview facility emergency management personnel on sites with multiple facilities having management roles with respect to emergency facilities or equipment to determine effectiveness of site-wide EFE program integration. Verify compliance with other DOE and non-DOE requirements applicable to EFE. Also identify any other Federal, state, tribal and local requirements or agreements pertaining to EFE with which the site/facility must comply. Provide references regarding implementation in adjacent columns. If possible, observe conduct of training and drills, as well as an exercise. Support determination of adequacy of facilities and equipment used for response through observations and interviews. Perform a walk-down of command centers, as well as other emergency facilities and key equipment locations, such as 24-hour watch stations, incident commander's vehicle, fire stations and equipment, monitoring centers, communications centers, and medical clinics.		
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equipment locations, such as 24-hour watch stations, incident commander's vehicle, fire stations and equipment, monitoring centers,	Perform a walk-down of command centers, as	
stations, incident commander's vehicle, fire stations and equipment, monitoring centers,	well as other emergency facilities and key	
stations and equipment, monitoring centers,	equipment locations, such as 24-hour watch	
	stations, incident commander's vehicle, fire	
	stations and equipment, monitoring centers,	

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9.1.1 Are facilities and equipment adequate to	
support emergency response available,	
operable, and maintained?	
At a minimum, do facilities include an	
adequate and viable command center?	
Does equipment include, (but is not limited	
to), personnel protective equipment,	
detectors, and decontamination equipment?	
Ref: DOE O 151.1C Attachment 2, CRD	
Section 10	
9.1.1.1 Are the characteristics of the dedicated	
command center, and other auxiliary facilities,	
adequate to reliably support the designated	
functions and assignments?	
Ref. EC P/E8.3	
9.1.1.2 Are designated response facilities,	
especially multi-use facilities, adequately	
maintained to ensure timely activation and	
availability to support an emergency response?	
Ref. EC P8.14	
9.1.1.3 As necessary, is conversion of facilities	
to response facilities for the emergency is	
accomplished in a timely and efficient manner.	
Ref. EC P/E8.7	
9.1.1.4 Are facility systems and installed	
equipment adequate to support facility functions	
and level of staffing?	
Ref. EC P/E8.5	
9.1.1.5 Do the actual function(s) and operating	
characteristics of specific equipment adequately	
support the intended function(s) during	
emergency response?	
Ref. EC P8.12	
9.1.1.6 Are adequate personnel protective	
equipment, and other emergency equipment and	
supplies, readily available and operable to meet	
the needs determined by the results of the	
EPHA?	
Ref. EC P/E8.11	
9.1.1.7 Are periodic inspections, operational	
checks, calibration, preventive maintenance and	
testing of equipment and supplies carried out as	
required in accordance with manufacturer's	
instructions or industry standards?	
Ref. EC P8.16	
9.1.1.8 Are inventories of all emergency	
equipment and supplies maintained with the	
equipment location identified?	
Ref. EC P8.15	
204	

204

9.1.1.9 Are communication systems with DOE	
HQ, Operations/Field offices and offsite	
organizations periodically tested?	
Ref. EC P8.17	
9.1.1.10 Is Command Center access control	
adequate and does it result in the efficient and	
timely identification of assigned staff?	
Ref. EC P/E8.8	
9.2.1 Does the site/facility provide facilities	
and equipment adequate to support	
emergency response, including the capability	
to notify employees of an emergency to	
facilitate the safe evacuation of employees	
from the work place, immediate work area, or both?	
Ref: DOE O 151.1C, Attachment 2, Section	
10a	
9.2.1.1 Is the capability to notify employees of	
an emergency to facilitate the safe evacuation of	
employees from the work lace, immediate work	
area, or both available?	
Ref. EC P/E8.9	
9.2.1.2 Is command center access control	
adequate and does it result in efficient and	
timely identification of assigned staff?	
Ref. EC P/E8.8	
9.2.1.3 Do emergency response facilities use	
backup or alternate power supplies in the event	
of loss of power?	
Ref. EC P/E8.6	
9.3.1 Does the contractor at a DOE/NNSA	
Operational Emergency Hazardous Material	
Program facility also establish and maintain	
facilities and equipment adequate to support	
emergency response as follows:	
A facility that is available for use as a	
command center?	
command center:	
Provisions for use of an alternate location if	
the primary command center is not	
available?	
Adequate personal protective equipment and	
other equipment and supplies that are	
available and operable to meet the needs	
determined by the results of the EPHA?	
Ref: DOE O 151.1C Attachment 2, CRD	
Section 10b	

9.3.1.1 Is a facility available for use as a	
command center by the emergency director, the	
EMT, and other members of the ERO during an	
emergency response?	
Ref. EC P/E8.2	
9.3.1.2 Are provisions established for use of an	
alternative location if the primary command	
center is not available?	
Ref. EC P/E8.4	
9.3.1.3 Are communication systems used to	
activate both on-shift and off-shift emergency	
response personnel tested and maintained	
regularly?	
Ref. EC P8.18	
9.3.1.4 Are provisions established to ensure	
operational compatibility between facility	
response capabilities and DOE or NNSA assets?	
Ref. EC P/E8.10	
9.3.1.5 Did the equipment needed during the	
emergency response (or exercise) function as	
expected and intended (or was repaired or	
obtained in a timely manner)?	
<u>This includes</u> :	
Current reference materials and decisional aids;	
Area and process monitors;	
Public address system;	
Personnel protective equipment;	
Portable monitoring instruments and personnel	
monitoring devices;	
Siren and alarm systems;	
Decontamination equipment; and	
Communication equipment.	
Ref. EC P8.13	

3.11 Element 10: Categorization and Classification

3.11.1. Description

Operational Emergencies are major unplanned or abnormal events or conditions that: involve or affect DOE/NNSA facilities and activities by causing or having the potential to cause serious health and safety or environmental impacts; require resources from outside the immediate/affected area or local event scene to supplement the initial response; and, require time-urgent notifications to initiate response activities at locations beyond the event scene. In general, to be considered an Operational Emergency, an event or condition involving the uncontrolled release of a hazardous material must: immediately threaten or endanger personnel who are in close proximity of the event; have the potential for dispersal beyond the immediate vicinity of the release in quantities that threaten the health and safety of onsite personnel or the public in collocated facilities, activities, and/or offsite; and have a potential rate of dispersal sufficient to require a time-urgent response to implement protective actions for workers and the public. (10.1.1)

In addition to being categorized as Operational Emergencies, events involving the actual or potential airborne release of (or loss of control over) hazardous materials from an onsite facility or activity also require prompt and accurate classification as an Alert, Site Area Emergency, or General Emergency, based on health effects parameters measured or estimated at specific receptor locations (e.g., facility and site boundaries) and compared with protective action criteria. Predetermined conservative onsite protective actions and offsite protective action recommendations must be associated with the classification of these Operational Emergencies (as an Alert, Site Area Emergency or General Emergency). (10.1.2)

Reference DOE Order 151.1C, Chapter IV and Attachment 2, Contractor Requirements Document, Sec 11.

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 4
Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D,
Evaluation Criteria, 9

3.11.2. Typical Compliance Problems

EALs have not been reviewed and are not understood by offsite emergency response officials. EALs have not been verified as accurate or validated as useable.

Decision-makers responsible for classification have not been trained or drilled sufficiently.

Implementing procedures for performing categorization/classification are not prepared or available.

EALs are ambiguous; are not prepared for the full spectrum of emergency events; are not prepared for onsite transportation events; thresholds for offsite transportation events are not prepared.

Discretionary EALs based on safety system status are not prepared; symptomatic EALs based on available instrument readings are not prepared.

EALs are not integrated with the formulation of protective actions for all population groups; EALs are not integrated with occurrence reporting procedures.

Classification for multiple events is not considered.

EAL matrix does not support timely classification of emergencies or determination of protective actions.

Thresholds are not prepared for operational emergencies not requiring further classification and non-emergency significant events.

Plant indications or monitoring instruments to support timely classification are not available.

3.11.3. Instructions to Evaluator:	
DOCUMENT/RECORDS REVIEW	NOTES
Review site hazards survey and hazards	
assessments for facilities of interest, including	
transportation hazards assessment.	
Review vulnerability analysis for facilities of	
interest.	
Review event scenarios.	
Review emergency plan and procedures for	
roles, responsibilities, job aids and checklists	
for categorization and classification.	
Review memoranda of agreement with local	
jurisdictions and states regarding	
methodologies and notifications.	
Review training lesson plans and qualification	
records.	
10.1.1 Do procedures for emergency	
categorization clearly reflect the following	
definition of OE?	
OEs are major unplanned or abnormal	
events or conditions that: involve or affect	
DOE/NNSA facilities and activities by	
causing or having the potential to cause	
serious health and safety or environmental	
impacts; require resources from outside the	
immediate/affected area or local event scene	
to supplement the initial response; and,	
require time-urgent notifications to initiate	
response activities at locations beyond the	
event scene.	
In general, to be considered an OE, an event	
or condition involving the uncontrolled	
release of a hazardous material must:	
immediately threaten or endanger personnel	
who are in close proximity of the event; have	
the potential for dispersal beyond the immediate vicinity of the release in quantities	
that threaten the health and safety of onsite	
personnel or the public in collocated facilities,	
activities, and/or offsite; and have a potential	
rate of dispersal sufficient to require a time-	
urgent response to implement protective	
actions for workers and the public.	
Ref. DOE O 151.1C, CRD Section 11	
10.1.1.1. Are the criteria for categorizing OEs	
clear, straightforward, usable and unambiguous	
to the decision-maker and stated in terms of	
readily available indications or observable	
conditions?	
Ref. EC P/E9.7	
204	

3-80

10.1.1.2 Is the	
recognition/categorization/classification process	
of OEs effectively integrated with existing	
operations, management, emergency response,	
reporting activities, and the security	
classification scheme?	
Ref. EC P/E9.3	
10.1.2 In addition to being categorized as	
OEs, are events involving the actual or	
potential airborne release of (or loss of	
control over) hazardous materials from an	
onsite facility or activity also promptly and	
accurately classified as an Alert, Site Area	
Emergency, or General Emergency, based on	
health effects parameters measured or	
estimated at specific receptor locations (e.g.,	
facility and site boundaries) and compared	
with protective action criteria?	
Are predetermined conservative onsite	
protective actions and offsite protective action	
recommendations associated with the	
classification of these OEs (as an Alert, Site	
Area Emergency or General Emergency)?	
Ref. DOE O 151.1C, CRD Section 11	
10.1.2.1 For emergencies involving hazardous	
materials, are time-urgent response actions taken	
to minimize or prevent unacceptable	
consequences?	
Ref. DOE O 151.1, Chapter IV, Section 5a	
Kel. DOE o 131.1, Chapter IV, Section 3a	
10.1.2.2 Is the classification of an operational	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential	
10.1.2.2 Is the classification of an operational	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential airborne release of hazardous material as alert,	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential airborne release of hazardous material as alert, site area emergency, or general emergency based	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential airborne release of hazardous material as alert, site area emergency, or general emergency based on the distance at which estimated consequences	
10.1.2.2 Is the classification of an operational emergency involving the actual or potential airborne release of hazardous material as alert, site area emergency, or general emergency based on the distance at which estimated consequences exceed the applicable health effect threshold (i.e.	

10.2.1 Did the contractor (at all DOE/NNSA facilities):	
Establish criteria for determining quickly if an event is an OE?	
Do procedures call for the contractor to declare an OE when events occur that represent a significant degradation in the level of safety at a site/facility and that require time-urgent response efforts from outside the site/facility?	
[Note: events stated under criteria 10.2.2, 10.2.3, 10.2.4. 10.2.5, and 10.2.6 do not require further classification (i.e., as Alert, Site Area Emergency, or General Emergency).] Ref. DOE O 151.1C, CRD Section 11a	

10.2.2 Do procedures for declaration of OEs reflect the following?

Health and Safety. The following events or conditions represent, cause, or have the potential to cause serious health and safety impacts to workers or members of the public. The discovery of radioactive or other hazardous material contamination from past DOE/NNSA operations that may have caused. is causing, or may reasonably be expected to cause uncontrolled personnel exposures exceeding protective action criteria. An offsite hazardous material event not associated with DOE/NNSA operations that is observed to have or is predicted to have an impact on a DOE/NNSA site, such that protective actions are required for onsite DOE/NNSA workers.

An occurrence (e.g., earthquake, tornado, aircraft crash, fire, explosion) that causes or can reasonably be expected to cause significant structural damage to DOE/NNSA facilities, with confirmed or suspected personnel injury or death.

Any facility evacuation in response to an actual occurrence that requires time-urgent response by specialist personnel, such as hazardous material responders or mutual aid groups not normally assigned to the affected facility.

An unplanned nuclear criticality.

Any mass casualty event.

Ref. DOE O 151.1C, CRD Section 11a(2)(a)

10.2.3 Do procedures for declaration of OEs	
reflect the following:	
Environment. The following events or	
conditions represent, cause, or have the	
potential to cause serious detrimental effects	
on the environment.	
Any actual or potential release of hazardous	
material or regulated pollutant to the	
environment, in a quantity greater than 5	
times the Reportable Quantity (RQ) specified	
for such material in 40 CFR 302, that could	
result in significant offsite consequences, such	
as major wildlife kills, wetland degradation,	
aquifer contamination, or the need to secure	
downstream water supply intakes.	
Any release of greater than 1,000 gallons (24	
barrels) of oil to inland waters; greater than	
10,000 gallons (238 barrels) of oil to coastal	
waters; or a quantity of oil that could result	
in significant off-site consequences (e.g., need	
to relocate people, major wildlife kills, wet-	
land degradation, aquifer contamination,	
need to secure downstream water supply	
intakes, etc.) [Oil as defined by the Clean	
Water Act (33 U.S.C. 1321) means any kind	
of oil and includes petroleum.]	
Ref. DOE O 151.1C, CRD Section 11a(2)(b)	
10.2.4 Do procedures for declaration of OEs	
reflect the following?	
Security and Safeguards. (Security incidents	
are also subject to reporting in accordance	
with DOE O 471.4, Incidents of Security	
Concern. Per this Order, foreign	
involvement in security incidents must be	
reported to the Office of Counterintelligence.)	
The following events or conditions represent,	
cause, or have the potential to cause	
degradation of security or safeguards	
conditions with actual or potential direct	
harm to people or the environment.	
Actual unplanned detonation of an explosive	
device or a credible threat of detonation	
resulting from the location of a confirmed or	
suspicious explosive device.	
An actual terrorist attack or sabotage event	
involving a DOE/NNSA site/facility or	
operation.	
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Kidnapping or taking hostage(s) involving a DOE/NNSA site/facility or operation.

Ref. DOE O 151.1C, CRD Section 11a(2)(c)

10.2.5 Do procedures for declaration of OEs reflect the following? Offsite DOE Transportation Activities. The following events or conditions represent an actual or potential release of hazardous materials from a DOE/NNSA shipment. Any accident/incident involving an offsite DOE/NNSA shipment containing hazardous materials that causes the initial responders to initiate protective actions at locations beyond the immediate/affected area. Failures in safety systems threaten the integrity of a nuclear weapon, component, or test device. A transportation accident results in damage to a nuclear explosive, nuclear explosive-like assembly, or Category I/II quantity of Special Nuclear Materials. Ref. DOE O 151.1C, CRD Section 11a(2)(d) 10.2.6 Do procedures for declaration of OEs reflect the following? Hazardous Biological Agent or Toxins. The following events or conditions involving the release of a hazardous biological agent or toxin [identified in 42 CFR 73, 7 CFR 331 and 9 CFR 121] represent major failure of safety systems, protocols, and/or practices with the potential to have a serious impact on health and safety of workers, collocated workers, emergency responders, members of the public, or the environment: Any actual or potential release of a hazardous biological agent or toxin outside of the secondary barriers of the biocontainment area. Ref. DOE O 151.1C, CRD Section 11a(2)(e) 10.2.7 Are OEs events categorized as promptly as possible, but no later than 15 minutes after event recognition/identification/discovery? Ref. DOE O 151.1C, CRD Section 11a(3) 10.3.1 Has the contractor at DOE/NNSA Operational Emergency Hazardous Material Program facility also established procedures to classify emergency events (as an Alert, Site Area Emergency, General Emergency)?		
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to a nuclear explosive, nuclear explosive-like assembly, or Category I/II quantity of Special Nuclear Materials. Ref. DOE O 151.1C, CRD Section 11a(2)(d) 10.2.6 Do procedures for declaration of OEs reflect the following? Hazardous Biological Agent or Toxins. The following events or conditions involving the release of a hazardous biological agent or toxin [identified in 42 CFR 73, 7 CFR 331 and 9 CFR 121] represent major failure of safety systems, protocols, and/or practices with the potential to have a serious impact on health and safety of workers, collocated workers, emergency responders, members of the public, or the environment: Any actual or potential release of a hazardous biological agent or toxin outside of the secondary barriers of the biocontainment area. Ref. DOE O 151.1C, CRD Section 11a(2)(e) 10.2.7 Are OEs events categorized as promptly as possible, but no later than 15 minutes after event recognition/identification/discovery? Ref. DOE O 151.1C, CRD Section 11a(3) 10.3.1 Has the contractor at DOE/NNSA Operational Emergency Hazardous Material Program facility also established procedures to classify emergency events (as an Alert, Site Area Emergency, General Emergency)?	A transportation accident results in damage	
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Program facility also established procedures to classify emergency events (as an Alert, Site Area Emergency, General Emergency)?		
to classify emergency events (as an Alert, Site Area Emergency, General Emergency)?		
Area Emergency, General Emergency)?		
	Ref. DOE O 151.1C, CRD Section 11b	

10.3.2 Are hazardous material emergencies	
involving DOE/NNSA facilities classified OE	
as either an Alert, Site Area Emergency, or	
General Emergency, in order of increasing	
severity, when events occur that represent a	
specific threat to workers and the public due	
to the release or potential release of	
significant quantities of hazardous materials?	
Does classification aid in the rapid	
communication of critical information and	
the initiation of appropriate time-urgent	
emergency response actions?	
Notes Essents Batalian seitemia 10.2.2.4h	
Note: Events, listed in criteria 10.2.2 through	
10.2.6 that serve as initiating events for the	
release of hazardous materials must be	
classified under the provisions of this section.	
Is this reflected in procedures and understood	
by personnel responsible for emergency	
classification?	
Ref. DOE O 151.1C, CRD Section 11b(1)	
10.3.1.1 Are events classified on the basis of	
potential severity of consequences?	
Ref. DOE O 151.1, Chapter IV, Section 5a	

10.3.3 <u>Alert</u>. Is an Alert declared when events are predicted, are in progress, or have occurred that result in one or more of the following?

An actual or potential substantial

degradation in the level of control over hazardous materials.

The radiation dose from any release to the environment of radioactive material or a concentration in air of other hazardous material is expected to exceed either— a site-specific criterion corresponding to 10 percent of the applicable protective action criterion [see Base Order, paragraph 4a(14)] at or beyond the facility boundary; or the applicable protective action criterion at or beyond 30 meters from the point of release to

the environment.

It is not expected that the applicable protective action criterion will be exceeded at or beyond the facility boundary.

An actual or potential substantial degradation in the level of safety or security of a nuclear weapon, component, or test device that would not pose an immediate threat to workers or the public.

An actual or potential substantial degradation in the level of safety or security of a facility or process that could, with further degradation, produce a Site Area Emergency or General Emergency.

Ref. DOE O 151.1C, CRD Section 11b(1)(a)

10.3.4 Site Area Emergency. Is a Site Area	
Emergency declared when events are	
predicted, in progress, or have occurred that	
result in one or more of the following	
situations?	
An actual or potential major failure of	
functions necessary for the protection of	
workers or the public. The radiation dose	
from any release of radioactive material or	
concentration in air from any release of other	
hazardous material is expected to exceed the	
applicable protective action criterion [see	
Base Order, paragraph 4a(14)] at or beyond	
the facility boundary. The protective action	
criterion is not expected to be exceeded at or	
beyond the site boundary.	
An actual or potential threat to the integrity	
of a nuclear weapon, component, or test	
device that may adversely impact the health	
and safety of workers in the immediate area,	
but not the public.	
Actual or potential major degradation in the	
level of safety or security of a facility or	
process that could, with further degradation,	
produce a General Emergency.	
Ref. DOE O 151.1C, CRD Section 11b(1)(b)	
10.3.5 General Emergency. Is a General	
Emergency declared when events are	
predicted, in progress, or have occurred that	
result in one or more of the following	
situations?	
Actual or imminent catastrophic reduction of	
facility safety or security systems with	
potential for the release of large quantities of	
hazardous materials to the environment. The	
radiation dose from any release of radioactive	
material or a concentration in air from any	
release of other hazardous material is	
expected to exceed the applicable protective	
action criterion [see Base Order, paragraph	
4a(14)] at or beyond the site boundary.	
Actual or likely catastrophic failures in safety	
or security systems threatening the integrity	
of a nuclear weapon, component, or test	
device that may adversely impact the health	
and safety of workers and the public.	
Ref. DOE O 151.1C, CRD Section 11b(1)(c)	

10.2.6 A vo Sito/focility angelfic Emergency	
10.3.6 Are Site/facility-specific Emergency	
Action Levels (EALs) developed for the	
spectrum of potential OEs identified by the	
EPHA and must include protective actions	
corresponding to each EAL?	
Ref. DOE O 151.1C, CRD Section 11b(2)	
10.3.6.1 Are EALs for classifying OEs clear,	
straightforward, usable and unambiguous to the	
decision-maker.	
Ref. EC P/E9.15	
10.3.6.2 Do the EALs for classifying OEs	
provide for early recognition, are they reliable,	
redundant, and internally consistent, and are	
they comprehensive and anticipatory of	
potential/future consequences?	
Ref. EC P/E9.16	
10.3.6.3 Are the EALs stated in terms of readily	
available indications or observable conditions?	
Ref. EC P/E9.16	
10.3.6.4 Are Site-/facility-specific EALs	
developed and approved for the spectrum of OEs	
resulting in the actual or potential airborne	
release of (or loss of control over) hazardous	
material?	
Ref. EC P/E9.16	
10.3.6.5 Do site-/facility EALs provide for	
classifying events on the basis of measured or	
predicted hazardous material consequences at	
specific receptor locations (i.e., facility and site	
boundaries)?	
Ref. EC P/E9.16	
Observations by Evaluators	Notes
Walk down facilities to review indicators	
referenced in EALs.	
Observe whether EALs are available and	
current for personnel performing	
categorization and classification.	
Conduct performance-based tabletops and	
interviews with initial decision-makers and	
with the site manager/crisis manager to	
determine adequacy of tools and understanding	
of emergency categorization and classification.	
Interview offsite EROs that respond to	
classified events to determine if they have	
received current EALs and have received	
information to support understanding.	
Interview site personnel responsible for	
developing EALs	
acretoping Lills	

Observa initial and continuing	
Observe initial and continuing	
categorization/classification during an	
emergency exercise and impact on and	
interface with performance of other emergency	
management program elements.	
10.1.1.3 Is an abnormal event/condition,	
categorized as an operational emergency only	
downgraded if the original categorization was	
incorrect?	
incorrect:	
Door a properly astagorized appretional	
Does a properly categorized operational	
emergency remain in effect until the emergency	
response is terminated?	
Ref. EC P/E9.10	
10.1.2.3 Is authority and responsibility for	
categorizing an event/condition, and if	
necessary, determining the emergency	
classification, clearly defined, recognized, and	
understood by ERO personnel.	
Ref. EC P/E9.1	
10.1.2.4 Did the designated (authorized)	
individual with responsibility for categorization	
and classification make the determination?	
Ref. EC P/E9.2	
10.1.2.5 If the event or condition is categorized	
as an operational emergency involving an	
airborne release of (or loss of control over)	
hazardous materials, did the decision-maker	
recognize the requirement to promptly classify	
the event?	
[Note: this does not apply to biological	
hazardous materials.]	
Ref. EC P/E9.8	
10.1.2.6 Is the classification of an operational	
emergency involving the actual or potential	
airborne release of or loss of control over	
hazardous material accomplished promptly and	
accurately using a current set of a site/facility-	
specific EALs?	
[Note: this does not apply to biological	
hazardous materials.]	
Ref. EC P/E9.11	
10.2.1.1 Is the categorization of abnormal	
events/conditions as OEs accomplished	
promptly and accurately using site/facility-	
specific EALs?	
Ref. EC P/E9.4	
INCI, LIC I/LI/.T	

10.3.2.1 Is a tool in place and used for	
recognizing and categorizing biological OEs,	
based on recognition factors identified in the	
EPHA, and is it part of the DOE/NNSA	
emergency management program for Biosafety	
facilities?	
Are default initial protective actions associated	
with each biological OE?	
Ref. EC P/E9.9	
10.3.2.2 Is the current classification modified	
(i.e., upgraded) based on continuous monitoring	
for event degradation or a reassessment that	
indicates that the event is more severe than	
originally perceived?	
Is an OE reclassified at a lower classification	
only if the original classification decision was in	
error (e.g. the decision-maker used the wrong	
EAL or received incorrect information; a	
properly classified OE remains in effect until the	
emergency response is terminated.)?	
Ref. EC P/E9.19	
10.3.3.1 In declaration of an Alert is there	
availability of personnel and resources to—	
Continuously assess pertinent information for	
DOE/NNSA decision makers, offsite authorities,	
the public and other appropriate entities;	
Conduct appropriate assessments, investigations,	
or preliminary sampling and monitoring;	
Mitigate the severity of the occurrence of its	
consequences; and	
Prepare for other response actions should the	
situation become more serious, requiring	
emergency response organizations to mobilize or	
activate resources?	
Ref. DOE O 151.1 C, Chapter IV, Section 5a(1)	

10.3.4.1 In declaration of a Site Area Emergency	
is there the same response as for an Alert plus—	
Initiation of predetermined protective actions for	
onsite personnel;	
Notification and assembly of emergency	
response personnel and equipment to activate	
response centers and to establish	
communications, consultation, and liaison with	
offsite authorities;	
Provision of information to the public and	
media;	
Ref. DOE O 151.1, Chapter IV, Section 5	
Implementation of or assistance in any	
evacuations and sheltering; and	
Mobilization of appropriate emergency response	
groups or protective/security forces for	
immediate dispatch, should the situation become	
more serious.	
Ref. DOE O 151.1 C, Chapter IV, Section 5a(2)	
10.3.5.1 In declaration of a General Emergency	
is there the same response as for a Site Area	
Emergency plus—	
Notification, mobilization, and dispatch of all	
appropriate emergency response personnel and	
equipment, including appropriate DOE	
emergency response assets, and liaison with	
offsite authorities for the recommendation of	
predetermined public protective actions.	
Ref. DOE O 151.1 C, Chapter IV, Section 5a(3)	
10.3.6.6 Is the appropriate set of appropriate	
site/facility-specific EALs readily accessible to	
the responsible decision-maker?	
Ref. EC P/E9.13	
10.3.6.7 If a suspected release of (or loss of	
control over) hazardous material fails to meet or	
exceed an EAL, then does a common sense,	
conservative assessment of the indications or	
observable conditions lead to an initial default	
estimate of the classification of the emergency	
event/condition using the discretionary EAL	
(i.e., a discretionary EAL is included in the EAL	
set to compensate for possible incompleteness	
and to ensure that a decision can be made	
rapidly based on the current understanding of the	
situation.)?	
Ref. EC P/E9.17	

10.3.6.8 Associated with a specific event EAL,	
does the decision-maker obtain default (i.e., pre-	
determined) conservative Protective Actions	
(PAs), for immediate implementation onsite, and	
Protective Action Recommendations (PARs), for	
immediate recommendation offsite?	
Ref. EC P/E9.18	
10.3.6.9 Are site-wide non facility-specific	
EALs used to classify events such as: terrorist	
threats, major natural phenomena, external	
events that can affect site operations, etc.?	
Ref. EC P/E9.20	
10.3.6.10 Are the OE categorization criteria and	
EALs reviewed and tested regularly against a	
range of initiating conditions and emergency	
event/condition scenarios to validate the	
indicated emergency	
categorization/classification?	
Ref. EC P9.21	

3.12 Element 11: Notification & Communications

3.12.1. Description

Initial emergency notifications must be made promptly, accurately and effectively to workers and emergency response personnel/organizations, appropriate DOE/NNSA elements, and other Federal, Tribal, State, and local organizations and authorities. Accurate and timely follow-up notifications must be made when conditions change, when the emergency classification level (as an Alert, Site Area Emergency, General Emergency) is upgraded, or when the emergency is terminated. Continuous, effective, and accurate communication among response components and/or organizations must be reliably maintained throughout an Operational Emergency. (11.3.1)

Reference DOE Order 151.1C, Chapter VIII and Attachment 2, Contractor Requirements Document Section 12.

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 5.

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria.

3.12.2. Typical Compliance Problems

Operational emergency notifications are not made within required 30 minutes.

Insufficient information is included in initial written notification to Headquarters Operations Center.

Points-of-contact lists are outdated and incomplete.

Notifications are not correctly filled out.

Notification forms are not formalized or coordinated with offsite officials.

Required subsequent notifications were not made within 15 minutes of change in event status.

Employee alarms not audible in all work areas.

Insufficient information provided during briefings of skilled emergency support personnel.

System for rapid notification and recall does not provide for authentication and feedback.

The established communication chain for reporting and notification within the facility, sitewide, and to offsite organizations is not properly followed.

Systems to alert and notify onsite workers and the public are not effective.

There is a breakdown in system for tracking personnel and providing personnel accountability.

Communications equipment breaks down and backup systems are not reliable or in place.

A breakdown in communication occurs between the emergency management and on-scene command.

Emergency information is not effectively or continuously tracked to ensure uniform understanding and provide a record of the sequence of events and actions.

Logs are not sufficiently maintained to support post-event analysis.

3.12.3. Instructions to Evaluator:

DOCUMENT/RECORDS REVIEW	NOTES
Review the site/facility emergency plan and	
procedures.	
Are instructions in place and clearly	
designating responsibility and authority for	
making initial verbal and written notifications	
required?	
Are points of contact for emergency	
notifications accurate?	

Review procedures and records of maintenance	
for communications equipment and alarm	
systems.	
Review agreements with outside agencies	
involving emergency response.	
Review forms and format for emergency	
notifications.	
11.1.1.1 Is a rapid notification and recall system	
in place to make initial and follow-up	
notifications to primary and alternate response	
staff?	
Does the system provide for authentication and	
feedback indicating unsuccessful contact?	
Ref. EC P/E10.6	
11.1.1.2 Do follow-up notifications use a pre-	
arranged and standardized content and format	
that supports the inclusion of critical information	
concerning: the nature of the event, description	
and status; key times; classification and release	
status (as required); meteorology; protective	
actions; affected facility; and, notification	
authority?	
Ref. EC P/E10.7	
11.1.1.3 Do emergency procedures formally	
establish a communication chain for reporting	
and notification within the facility, site-wide and	
to offsite organizations?	
Ref. EC P/E10.11	
11.1.1.4 Do records indicate reliability of	
equipment for communications with emergency	
organizations and response personnel?	
Ref. EC P/E 10.14	
Observations by Evaluators	Notes
Observe performance of personnel, operability	
of communications equipment, use of status	
boards, preparation of emergency records and	
system operations during an emergency	
exercise.	
Interview personnel with responsibility for	
making initial and ongoing emergency	
notifications.	
Interview offsite organization personnel who	
receive emergency notifications and	
communications tests from the site.	
Interview personnel responsible for preparing	
final report on emergency response.	
Verify compliance with non-DOE requirements	
referenced herein.	

11.1.1 Are initial emergency notifications made promptly, accurately and effectively to workers and emergency response personnel/organizations, appropriate DOE/NNSA elements, and other Federal, Tribal, State and local organizations and authorities?	
Are accurate and timely follow-up notifications made when conditions change, when the emergency classification level (as an Alert, Site Area emergency, General emergency) is upgraded, or when the emergency is terminated?	
Is continuous, effective, and accurate communication among response components and/or organizations reliably maintained throughout an OE? Ref. DOE Order 151.1C, CRD Section 12	
11.1.1.5 Does the Emergency Director, or designee, personally approve release of notification information? Ref. EC P/E10.9	

11.1.2 Does the contractor provide prompt	
initial notification of workers, emergency	
response personnel, and response	
organizations, including DOPE/NNSA	
elements and state, tribal, and local	
organizations?	
Does the contractor notify state and local	
officials and the Cognizant Field Element	
Operations Center (EOC) and Headquarters	
Operations Center within 15 minutes and all	
other organizations within 30 minutes of the	
declaration of Alert, Site Area Emergency, or	
General Emergency?	
Does the contractor notify the Cognizant	
Field Element EOC and Headquarters	
Operations Center within 30 minutes of the	
declaration of an OE not requiring	
classification?	
Does the contractor notify local, state and	
tribal organizations within 30 minutes or as	
established in mutual agreements for	
declaration of an OE not requiring	
classification?	
Ref. DOE Order 151.1C, Attachment 2 CRD	
Section 12a-d	
11.1.2.1 Are points of contact for emergency	
notifications accurate and readily available to	
response personnel? Ref. EC P/E10.4	
11.1.2.2 Do installed PA and siren systems	
adequately accomplish the notifications of	
workers and onsite or neighboring public?	
Ref. EC P/E10.12	
11.1.2.3 Are building and area alarms or public	
address (PA) systems designed, installed and	
maintained to alert facility personnel to	

11.1.3 At a minimum, does emergency notification to the Headquarters Operations Center consist of a phone call providing as much information as is known at the time?

Is the same information provided by e-mail or a fax, either immediately prior to or following the phone call?

Does information for initial notification include the following?:

That an OE has been declared and, if appropriate, the classification of the emergency;

The description of the emergency;

The date and time the emergency was discovered;

The damage and casualties;

Whether the emergency has stopped other facility/site operations or program activities;

The protective actions taken and/or recommended;

The notifications made;

The weather conditions at the scene of the emergency;

The level of any media interest at the scene of the emergency or at the facility/site; and The contact information of the DOE or NNSA on-scene point of contact. Ref. DOE Order 151.1C, Attachment 2 CRD

Section 12e

11.1.4 Does the contractor: Provide for	
continuing effective communication among	
response organizations throughout an	
emergency?	
Establish effective communications methods	
between event scene responders, emergency	
managers, and response facilities?	
Forward emergency status reports to the	
next-higher Emergency Management Team	
on a continuing basis until the emergency is terminated?	
terminateu.	
Does each activated Emergency Management	
Team submit a final report on the emergency	
response to the Emergency Manager for	
submission to the Director, Office of	
Emergency Operations, following termination	
of emergency response, and in conjunction with the Final Occurrence Report (see	
DOE M 231.1-2).	
DOD 111 20111 2)1	
Review all reports and releases for classified	
or unclassified controlled information (e.g.,	
Unclassified Controlled Nuclear Information)	
prior to being provided to personnel not	
authorized access to such information,	
entered into databases not authorized for such information, or transmitted using non-	
secure communications equipment.	
Ref. DOE Order 151.1C, Attachment 2 CRD	
Section 12f-j	
11.1.4.1 Are employee alarm systems in place	
and operable per the referenced OSHA	
requirement? Ref. 29 CFR 1910.165	
11.1.4.2 As applicable, are criteria met for	
emergency planning and notification—in accordance with the referenced requirement?	
emergency planning and notification—in	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made when conditions change or when the emergency	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made when conditions change or when the emergency classification is upgraded or terminated?	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made when conditions change or when the emergency classification is upgraded or terminated? Ref. EC P/E10.8	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made when conditions change or when the emergency classification is upgraded or terminated? Ref. EC P/E10.8 11.1.4.4 Does the Emergency Director, or	
emergency planning and notification—in accordance with the referenced requirement? Ref. 40 CFR 355.40, Emergency Release Notification 11.1.4.3 Are follow-up notifications are made when conditions change or when the emergency classification is upgraded or terminated? Ref. EC P/E10.8	

11.1.4.5 Are emergency status reports	
(SITREPs) forwarded to the next-higher	
Emergency Management Team on a continuing	
basis throughout the OE?	
Ref. EC P/E10.10	
11.1.4.6 Is a formally established	
communication chain for reporting and	
notification within the facility, site-wide, and to	
offsite organizations properly followed?	
Ref. EC P/E10.11	
11.1.4.7 Are communications systems effective	
to support management and tracking of	
evacuation of facility personnel, personnel	
accountability and assembly?	
Ref. EC P/E10.13	
11.1.4.8 Do installed voice communications	
systems adequately accomplish notification and	
information exchange processes?	
Ref. EC P/E10.14	
11.1.4.9 Is equipment reliable for	
communications with emergency organizations	
and response personnel?	
Ref. EC P/E10.14	
11.1.4.10 Are dedicated primary and backup	
voice communications links provided between	
key emergency response facilities and sufficient	
non-dedicated voice communication links are	
provided to access offsite organizations?	
Ref. EC P/E10.14	
11.1.4.11 Are mobile and commercial phone	
lines available?	
Ref. EC P/E10.14	
11.1.4.12 Are continuous, effective, and	
accurate communications among response	
components and/or organizations (e.g., event	
scene responders, emergency managers,	
response facilities, and workers who have taken	
protective actions) reliably established and	
maintained throughout an OE?	
Ref. EC P/E10.15	
11.1.4.13 Are notifications and key	
communications properly documented and	
displayed in emergency response facilities?	
Ref. EC P/E10.16	
11.1.4.14 Is a formal system in place to record,	
sequence, validate, and track the flow and	
chronology of emergency information?	
Ref. EC P/E10.17	
l	

11.1.4.15 Are logs maintained and other record-	
keeping methods utilized to support post-event	
analysis, report production, and a legally	
defensible chronology of notification and	
communications activities?	
Ref. EC P/E10.18	

3.13 Element 12: Consequence Assessment

3.13.1. Description

Estimates of onsite and offsite consequences of actual or potential releases of hazardous materials must be computed and assessed correctly and in a timely manner throughout the emergency. Consequence assessments must be: integrated with emergency classification and protective action decision-making; incorporated with facility and field indications and measurements; and coordinated with offsite agencies (12.1.1)

Reference DOE Order 151.1C, Attachment 2, Contractor Requirements Document Section 13
Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 6
Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D,
Evaluation Criteria

3.13.2. Typical Compliance Problems

Assessments are delayed and/or less than accurate.

The impact of meteorological factors on potential onsite and offsite consequences is not understood.

Differences among various consequence projections are not reconciled.

Default consequence modeling parameters have not been modified to reflect site-specific requirements.

Differences between field monitoring readings compared to dose projects are not reconciled and information provided by different instruments is not understood.

The potential for hazardous material release based on available plant indications, such as threat to integrity of material barriers is not determined.

Incorrect protective action criteria are compared to consequence assessment results.

Personnel do not refine consequence projections based on updated or confirmed source term information and determine the consequences of "what if" conditions.

Consequence assessors do not have ready access to information or tools needed to perform timely and accurate assessments. Tools and information include: source term information and conversion factors; field monitoring data from various field teams; tools to overlay consequence projections onto maps showing impacted areas and receptors.

3.13.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW Review site hazards survey and hazards assessments for facilities of interest, including transportation hazards assessment. Review emergency plan for roles and responsibilities for consequence assessment. Review emergency implementing procedures for initial and continuous assessment performance, forms used and field monitoring. Review computer manuals for assessment hardware and software and quality assurance. Review training lessons and records for consequence assessment and dose modeling.

1001 II II I I I DODANICA	
12.2.1 Has the contractor at DOE/NNSA	
Operational Emergency Hazardous Material	
Program facilities established provisions to	
assess the potential or actual onsite and	
offsite consequences of an emergency?	
Ref. DOE O 151.1C, CRD Section 13	
12.2.1.1 Is a formal Quality Assurance Program	
implemented and maintained for control of the	
tools used in consequence assessment, such as	
the meteorological monitoring system hardware	
and software, and dose modeling hardware and	
software?	
Ref. EC P11.22	
12.2.1.2 Does the facility's consequence	
assessment process for releases of biological	
agents, either detected or undetected, involve the confirmation that a release to the environment	
from a biosafety facility has occurred?	
Ref EC P/E11.9	
12.2.4 If the facility has the potential for an	
Operational Emergency classified as a Site	
Area Emergency, does the facility/site have	
procedures in place to activate or request	
National Atmospheric Release Advisory	
Center (NARAC) capabilities and is it able to	
use those capabilities as part of near real-time	
consequence assessment activities?	
Ref. DOE O 151.1C, CRD Section 13c	
12.2.5 All DOE/NNSA facilities/sites that have	
access to NARAC or have procedures in place	
to activate or request NARAC capabilities	
must ensure that facility/site meteorological	
data and information on source terms for	
actual or potential releases of hazardous	
materials to the atmosphere are available or	
can be made available to NARAC in a timely	
manner to facilitate near real-time	
computations. Does the facility/site meet this	
requirement?	
Ref. DOE O 151.1C, CRD Section 13d	
12.2.5.1 Are provisions in place for requesting	
support from the DOE radiological emergency	
response assets [e.g., Aerial Measuring System	
(AMS) or the National Atmospheric Release	
Advisory Center (NARAC)] to assist in accident	
and consequence assessments as well as to	
estimate the integrated impact of a hazardous	
materials release to onsite and offsite	
populations?	
Ref. EC P/E11.4	
Kei. Le I/EII.7	

12.2.5.2 Each DOE site should establish a	
meteorological monitoring program that is	
appropriate to the activities at the site, the	
topographical characteristics of the site, and the	
distance to critical receptors in order to	
characterize releases from DOE activities, assess	
impacts and estimate the dispersal patterns in the	
environment. Does the site meet this	
requirement?	
Ref. DOE/EH-0173T, "Environmental	
Regulatory guide for Radiological Effluent	
Monitoring and Environmental Surveillance,	
Section 4.0	
12.2.5.3 Does the meteorological monitoring	
program provide for routine inspection of the	
data and scheduled maintenance and calibration	
of the meteorological instrumentation and data-	
acquisition system at a minimum, based on the	
calibration frequency recommendations of the	
manufacturers?	
Ref. DOE/EH-0173T, "Environmental	
Regulatory guide for Radiological Effluent	
Monitoring and Environmental Surveillance,	
Section 4.0	
12.2.5.4 Are inspections, maintenance and	
calibrations of the meteorological instruments	
conducted in accordance with written	
procedures, and logs of the inspections,	
maintenance, and calibrations should be kept	
and maintained as permanent records?	
Ref. DOE/EH-0173T, "Environmental	
Regulatory guide for Radiological Effluent	
Monitoring and Environmental Surveillance,	
Section 4.0	
12.2.5.5 Does the meteorological instrument	
system provide data recovery of at least 90% on	
an annual basis for wind direction, wind speed,	
those parameters necessary to classify	
atmospheric stability, and other meteorological	
elements required for dose assessments?	
Ref. DOE/EH-0173T, "Environmental	
Regulatory guide for Radiological Effluent	
Monitoring and Environmental Surveillance,	
Section 4.0	
Observations by Evaluators	Notes
Observe consequence assessment (initial and	
continuous) performance during exercise or	
drill.	
Do a physical inspection of meteorological	
facilities and equipment.	

Town and a mariness and are all the mariness and	
Inspect equipment used to support	
consequence assessment.	
Interview personnel in monitoring field teams.	
12.1.1 Are estimates of onsite and offsite	
consequences of actual or potential releases of	
hazardous materials computed and assessed	
correctly and in a timely manner throughout	
the emergency?	
Are consequence assessments integrated with	
emergency classification and protective action	
decision-making; incorporated with facility	
and field indications and measurements; and	
coordinated with offsite agencies?	
Ref. DOE O 151.1C, CRD Section 13	
12.1.1.1 Is a formal document control system	
implemented during an emergency to record,	
sequence, validate and track the flow and	
chronology of information?	
Rev. EC P/E11.8	
12.1.1.2 As available, is data from	
environmental monitoring programs used to	
support consequence assessment, including data	
from installed air monitors, area radiation	
monitors, and in-plant surveys?	
Ref. EC P/E11.18	
12.2.2 Are consequence assessments that are	
made:	
Timely throughout the emergency;	
, ,	
Integrated with the emergency	
classification and protective action	
process;	
•	
Incorporate monitoring of specific	
indicators and field measurements; and	
coordinated with Federal, State, local, and	
Tribal organizations?	
Ref. DOE O 151.1C, CRD Section 13a	
12.2.2.1 Is a Timely Initial Assessment of the	
actual or potential consequences of an	
emergency performed effectively and efficiently,	
shortly after initial classification, using any	
available real-time event and meteorological	
data to provide an event-specific estimate of	
consequences?	
Rev. EC P/E11.1	
12.2.2.2 Are timely in-depth assessments of	
event consequences made continuously	
throughout an emergency?	
Ref. EC P/E11.2	
ICI, LC 1/L11,2	

12.2.2.3 Are consequence estimates, performed
by hand and/or computer-based calculations,
accomplished in a timely and efficient manner
hroughout the emergency to adequately assess
he actual or potential onsite and offsite
consequences?
Ref. EC P/E11.2
12.2.2.4 Are assessments updated when there are
actual and projected changes in facility status,
release conditions, or meteorology, or when
here are data from field monitoring teams?
Ref. EC P/E11.2
12.2.2.5 Are different models, assumptions, and
nput data used, as available, to add to the
understanding of the event and its
consequences?
Ref. EC P/E11.2
12.2.2.6 Are the indicators (e.g., system
pressures, flow rates, radiation levels, release
rates, etc.), necessary to continually assess the
consequences of the emergency
events/conditions, identified and monitored?
Ref. EC P/E11.2
12.2.2.7 Is the consequence assessment process
ntegrated with processes for categorizing an
event as an emergency, determining the
appropriate emergency class, protective action
lecision-making, and locating and recovering
materials?
Rev. EC P/E11.3
12.2.2.8 Are natural phenomena (e.g., tornados,
floods, severe wind, ice, or snow), which may
result in or exacerbate an emergency condition
at the facility, operation, and/or activity
monitored?
Rev. EC P/E11.7
12.2.2.9 Are the tools used in consequence
assessment, such as system hardware and
software for meteorological monitoring and dose
modeling, etc. available, reliable, calibrated and
consistent with DOE and industry standards?
Rev. EC P/E11.10
12.2.2.10 Are the type of hazard and source term
For the release of a hazardous material
successfully determined either with available
and reliable facility system parameters and
effluent monitors or with data that is not
normally monitored and measured?
Ref. EC P/E11.11

12.2.2.11 Is data for source term estimates	
available from reliable sources (e.g., stack or	
process flow rates, concentrations, tank	
volumes, and containment or process building	
leak rates)?	
Ref. EC P/E11.11	
12.2.2.12 Is the methodology for determining	
the type of hazard and source term compatible	
with instrumentation/monitor values (e.g.,	
engineering units, range, and conversion	
factors)?	
Ref. EC P/E11.11	
122.2.13 Are the instruments used for detection	
of chemical releases to the atmosphere sufficient	
range to accurately determine the concentration	
of the released chemical(s) in air versus the	
Emergency Response Planning Guideilnes	
(ERPGs)?	
Ref. EC P/E11.11	
12.2.2.14 Are indicators that are not continually	
monitored (e.g., chemical analyses of fluids,	
contamination levels, etc.,) sampled to identify	
the particular indicators to be continually	
monitored to assess the consequences of	
potential events, in addition to occurring events,	
by identifying trends, relationships, etc., that	
would indicate degrading conditions?	
Ref. EC P/E11.11	
12.2.2.15 Are onsite and offsite receptors of	
interest identified quickly and readily available	
to emergency managers (e.g., receptor locations	
at the facility and site boundaries, to or beyond	
the EPZ boundary, and populations with special	
needs.)?	
Rev. EC P/E11.13	
12.2.2.16 Is adequate meteorological	
information obtained for use in transport and	
dispersion calculations to project the	
consequences of the hazardous material release	
to the environment, onsite and offsite?	
Ref. EC P/E11.12	

12.2.2.17 Do the consequence estimates for	_
12.2.2.17 Do the consequence estimates for	
actual or potential releases of hazardous	
materials meet the following requirements:	
Are made in a timely manner, efficiently, and	
accurately (i.e., consistent with the accuracy of	
the input data);	
Account for releases from ground level and	
elevated release points, or monitored and	
unmonitored pathways; make use of post	
accident analysis results and field monitoring	
team data, as appropriate;	
Include calculations of radioactive dose or	ļ
toxic chemical exposure for the external,	
inhalation, and ingestion pathways, as	
appropriate;	
арргорпаю,	
Are provided for receptor locations at the	
facility and site boundaries, to or beyond the	
EPZ boundary, and for populations with	
special needs; and	
Use appropriate facility-specific Protective	
Action Criteria (PAC) which are identified	
and readily available to consequence	
assessment teams for estimating health effects	
at a specified distance from the event.	
Ref. EC P/E11.14	
12.2.2.18 Do field teams receive initial,	
conservative estimates of projected	
consequences in a timely manner prior to being	
dispatched for sampling, monitoring, and plume	
tracking activities?	
Ref. EC P/E11.15	
12.2.2.19 Are field sampling and monitoring	
activities used to verify, update, and refine the	
source term and projected consequences through	
coordination with those responsible for	
consequence estimates?	
Ref. EC P/E11.16	
12.2.2.20 Do field teams (i.e., radiological and	
non-radiological field teams) successfully	
accomplish field monitoring and plume tracking	
within and beyond the EPZ, and, similarly,	
verify the absence of consequences in specific	
areas?	
Ref. EC P/E11.17	

12.2.2.21 As available, is data from	
environmental monitoring programs used to	
support consequence assessment, including data	
from installed air monitors, area radiation	
monitors, and in-plant surveys?	
Ref. EC P/E11.18	
12.2.2.22 Is effective coordination established	
with Federal, tribal, state, and local	
organizations to estimate the impact of the	
release on the public and the environment, locate	
and track hazardous materials released, and	
locate and recover materials, especially those	
with national security implications?	
Ref. EC P/E11.16	
12.2.2.23 Are field monitoring and data	
collection by facility and site teams, State and	
local teams and Federal teams coordinated to	
facilitate exchanges and correlation of	
information?	
Ref. EC P/E11.17	
12.2.2.24 Is effective coordination established	
with Federal, tribal, state and local organizations	
to estimate the impact of the release on the	
public and the environment, locate and track	
hazardous materials released, and locate and	
recover materials, especially those with national	
security implications?	
Ref. EC P/E11.19	
12.2.2.25 Are field monitoring and data	
collection by facility and site teams, state and	
local teams and Federal teams coordinated to	
facilitate exchanges and correlation of	
information?	
Ref. EC P/E11.20	
12.2.2.26 Are assessments and analyses clearly	
communicated to offsite emergency	
management decision-makers?	
Are engineering units used in facility/site	
consequence assessment understood and	
compatible with the units used by offsite	
emergency response authorities?	
Are differences in modeling methods well	
understood by onsite and offsite emergency	
response personnel?	
Ref. EC P/E11.21	

12.2.3 If the facility has the potential for an	
OE classified as a General Emergency, does	
the facility/site have connectivity to NARAC	
capabilities and procedures to use the	
NARAC capability effectively as part of near	
real-time consequence assessment activities	
for the mode (primary, backup,	
corroborating) selected by the facility?	
Ref. DOE O 151.1C, CRD Section 13b	

3.14 Element 13: Protective Actions and Reentry

3.14.1. Description

Protective actions must be promptly and effectively implemented or recommended for implementation, as needed, to minimize the consequences of emergencies and to protect the health and safety of workers and the public. Protective actions must be implemented individually or in combination to reduce exposures to a wide range of hazardous materials. Protective actions must be reassessed throughout an emergency and modified as conditions change. Reentry activities must be planned, coordinated, and accomplished properly and safely. (13.1.1)

Reference DOE Order 151.1C Attachment 2, Contractor Requirements Document Section 14. Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 7

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.14.2. Typical Compliance Problems

Personnel responsible for protective actions (PA) are not proficient in performing the task.

PA is delayed.

Initial decision-makers cannot interpret PA formulation tools.

Emergency response managers are not familiar with criteria for classifying emergencies and issuing PA and cannot use site procedures to identify these criteria.

Procedures for PA lack sufficient guidance.

Consequence assessors do not apply the correct PA criteria when formulating PA recommendations for decision-makers.

Co-located workers are not promptly notified of required PA.

Security force dispatch and response personnel lack familiarity with emergency management concepts of isolation zones, PA zones and EPZs to ensure their safety.

Security forces do not possess personal protective equipment or are not trained in its use.

Emergency response managers rely on memory instead of procedures for performing tasks like categorization/classification and formulation of PA.

Procedures for updating PA recommendations following analysis of consequence assessment of field monitoring data are not available.

Tools are not available for overlaying consequence projections onto maps showing impacted areas, receptors and applicable PA.

Procedures lack guidance on roles and responsibilities for deploying PA forces to an incident scene outside a facility boundary without placing forces in harm's way.

Procedures do not adequately address PA and personnel could mistakenly be directed to evacuate to an assembly area rather than to shelter in place.

Protective action guides for emergency workers are not consistent with 10 CFR 835 dose limits and may not contain the 10 CFR 835 requirements for approvals.

Documents used by incident commanders for recommending PA for the public are uncontrolled and not specifically supported by any emergency procedures.

Job aids do not contain decision paths with observable criteria.

3.14.3. Instructions to Evaluator:

5.14.5. Histi actions to Lyanator.	
DOCUMENT/RECORDS REVIEW	NOTES
Review emergency procedures for determining	
and implementing protective actions, notifying	
offsite agencies that receive public protective	
recommendations, and conducting reentry.	

Review memoranda of agreement regarding	
consensus among site and offsite jurisdictions	
about PA to be implemented in demographic	
sectors surrounding the site.	
Review curriculum lessons plans for ERO	
members responsible for formulating protective	
actions.	
Review training and qualification records for	
individuals qualified as decision-makers and	
responsible for formulating and implementing	
PA.	
13.2.1 Did the contractor, at the DOE/NNSA	
site/facility:	
Develop procedures to implement the	
separate protective actions of evacuation and	
sheltering of employees?	
Develop a procedure to account for	
employees after emergency evacuation has	
been completed?	
Does the contractor ensure the protection of	
workers, covered by 29 CFR 1910.120,	
involved in response and clean up?	
D 6 DOE O 1 1511C A44 1 42 CDD	
Ref. DOE Order 151.1C Attachment 2, CRD	
Sec 14a(3)	

13.3.1 Did the contractor (at DOE/NNSA	
Operational Emergency Hazardous Material	
Program facilities) predetermine protective	
actions for onsite personnel and the public,	
and did this include:	
Methods for controlling, monitoring, and	
maintaining records of personnel exposures	
to hazardous materials;	
,	
Procedures to implement the separate	
protective actions of evacuation and	
sheltering of employees;	
Methods for controlling access to	
contaminated areas and for decontaminating	
personnel or equipment exiting the area;	
Actions that may be taken to increase the	
effectiveness of protective actions [i.e., heating, ventilation, and air conditioning	
(HVAC) shutdown during sheltering];	
(11 vite) shatawii daring shetteringi,	
Methods for providing timely	
recommendations to appropriate State,	
Tribal, or local authorities of protective	
actions, such as sheltering, evacuation,	
relocation, and food control; and	
Specific protective action criteria, based on	
the Base Order, paragraph 4a(14), for use in	
protective action decision-making.	
Ref. DOE Order 151.1C Attachment 2, CRD	
Sec 14b	
13.3.1.1 Are initial onsite Protective Actions	
(PAs) and offsite Protective Action Recommendations (PARs) linked to facility-	
specific OE event classification criteria [i.e.,	
Emergency Action Levels (EALs)]?	
Ref. EC P/E12.5	
13.3.1.2 Are initial onsite PAs and offsite	
Protective Action Recommendations (PARs)	
linked to facility-specific biological OE event	
recognition and categorization criteria? Ref. EC P/E12.6	
Observations by Evaluators	Notes
Observe emergency protective action decision	
making during an emergency exercise (use of	
procedures, knowledge, timely).	

Observe adequacy of protective equipment in	
the field and within emergency response	
facilities during response.	
Observe use of equipment by emergency	
personnel.	
Observe emergency communications and	
interfaces with offsite emergency management	
organizations concerning protective action	
decision-making and communications.	
Observe emergency communication and	
interfaces between protective action decision	
makers and internal groups such as security,	
HP, IH.	
Observe the protection of workers during	
emergency response.	
Observe the planning, coordination and	
implementation of reentry activities.	
13.1.1 Were protective actions promptly	
and effectively implemented or	
recommended for implementation, as	
needed, to minimize the consequences of	
emergencies and to protect the health and	
safety of workers and the public?	
safety of workers and the public.	
Were protective actions implemented	
individually or in combination to reduce	
exposures to a wide range of hazardous	
materials?	
muter mis.	
Were protective actions reassessed	
throughout an emergency and modified	
as conditions change?	
Wang Doonton activities planned accordingted	
Were Reentry activities planned, coordinated,	
and accomplished properly and safely?	
Ref. DOE Order 151.1C Attachment 2, CRD Section 14	
13.1.1.1 Are all emergency response activities, including search and rescue, incident mitigation	
activities, field monitoring, and reentry planned and controlled with a focus on health and safety	
of emergency responders within pre-planned	
protective action exposure guidelines?	
Ref. EC P/E12.1	
13.1.1.2 Do protective actions reflect a	
conservative assessment of the level of health	
effect and extent of potentially	
affected/impacted area and populations? Ref. EC P/E12.3	

13.1.1.3 Are the notification and implementation	
of onsite PAs and notification of offsite PARs	
made in a timely, efficient, and unambiguous	
manner confirmed and monitored by the ERO?	
Ref. EC P/E12.4	
13.1.1.4 Are modifications to initial protective	
actions developed and implemented based on	
updated and refined data generated from the	
continuous consequence assessment process?	
Ref. EC P/E12.8	
13.1.1.5 Are other possible protective actions for	
onsite and offsite populations, such as thyroid	
blocking agent, chemical neutralizing agents,	
water and food intervention levels,	
transportation route access controls, and	
impromptu respiratory protection considered by	
decision-makers?	
Ref. EC P/E12.9	
13.1.1.6 Is onsite protective action decision-	
making coordinated with site organizations such	
as security and safety?	
Security and law enforcement measures	
implemented during a physical attack that	
impact worker and responder access and egress	
(e.g., lockdown) are coordinated with	
emergency management and site security?	
The identification of necessary PPE is	
coordinated with emergency management and	
safety professionals, including industrial safety,	
industrial hygiene, health physics, and fire	
protection engineering?	
Ref. EC P/E12.10	
13.1.1.7 Is reentry and approval of extended	
dose or exposure limits within the authority and	
responsibility of the Emergency Director?	
Ref. EC P/E12.22	
13.1.1.8 Are reentry activities performed safely	
and efficiently, with specific team composition	
(e.g., minimum of one medically trained	
member) and equipment that accomplishes the	
mission?	
Ref. EC P/E12.24	

13.1.1.9 Does reentry planning address the	
following:	
Conduct of operations during reentry;	
Range of hazardous materials which may be	
encountered;	
Hazard control procedures; type and nature of	
potential safety failures;	
Guidelines for prioritization of reentry activities;	
Team selection, personnel safety, job planning,	
communications during reentry; record keeping;	
and	
Provisions for backup to every reentry?	
Ref. EC P/E12.25	
13.1.1.10 Are exposure criteria established and	
available for each type of reentry activity,	
including search and rescue, and repair? Are 10	
CFR 835, Subpart N limits observed for	
radiological events, such as lifesaving,	
protection of health and property, and recovery	
of deceased? Volunteers are used for high-risk	
situations?	
Ref. EC P/E12.27	
13.1.1.11 Do facility personnel estimate	
exposure to hazardous materials to protect	
workers and the public during reentry and	
recovery activities?	
Ref. EC P/E12.23	
13.1.1.12 Does reentry planning include	
contingency planning to ensure the safety of	
reentry personnel, such as planning for the	
rescue of reentry teams?	
Do all individuals involved in reentry receive a	
hazards/safety briefing consistent with Federal,	
State, and local laws and regulations?	
Ref. EC P/E12.26	
13.1.1.13 Do responders involved in reentry	
receive pre-reentry hazards/safety briefings prior	
to emergency response activities and post-	
reentry briefings consistent with Federal, tribal,	
state, and local laws and regulations?	
Ref. EC P/E12.28	
13.2.1.1 Was PPE selection, use limitations,	
care, maintenance, useful life and disposal in	
accordance with the referenced requirements?	
Ref. 29 CFR 1910.120 (q) (10) and 29 CFR	
1910.120(g)	

13.2.1.2 Did employees engaged in	
emergency response and exposed to	
hazardous materials presenting inhalation	
hazards or potential inhalation hazard wear	
positive pressure self-contained breathing	
apparatus while engaged in emergency	
response, in accordance with the referenced	
requirement?	
Ref. 29 CFR 1910.120 (q)(3)(iv)	
13.2.1.3 Did backup personnel stand by with	
equipment ready to provide assistance or	
rescue?	
Did advanced first aid support personnel, as	
a minimum, stand by with medical	
equipment and transport capability?	
Ref. 29 CFR 1910.120 (q)(3)(vi)	
13.2.1.4 Were respiratory protection fit tests,	
selection, use, maintenance and training	
conducted in accordance with the referenced	
OSHA requirements?	
Ref. 29 CFR 1910.132 (General	
Requirements for PPE Program) and 29	
CFR 1910.134 (Respiratory protection	
requirements)	
13.2.1.5 Are plans followed for the timely	
evacuation and/or sheltering of onsite personnel,	
along with provisions to account for employees	
after emergency evacuation has been completed?	
Ref. EC P/E12.11	
13.2.1.6 Emergency evacuations for site	
personnel:	
Are evacuation route selection and logistical	
details implemented promptly and efficiently?	
Ref. EC P/E12.12	
13.2.1.7 Do multiple evacuation egress routes	
provide options based upon release type and	
wind direction; and do evacuation routes avoid	
hazards, are routes familiar to site personnel, and	
coordinated with offsite authorities?	
Ref. EC P/E12.12	
13.2.1.8 Is the reception/relocation center	
sufficient to accommodate the expected number	
of personnel; and are adequate personnel	
assigned to control evacuees and are they kept	
aware of change in onsite protective action	
modifications?	
Ref. EC P/E12.12	

13.2.1.9 Do trained and assigned individuals assume and carry out responsibilities for	
building or facility accountability in the event of	
personnel evacuation?	
Ref. EC P/E12.13	
13.2.1.10 Is initial accounting for all evacuated	
personnel completed in a timely manner to	
support initial search and rescue activities?	
Ref. EC P/E12.13	
13.2.1.11 Is accountability continued to support ongoing search and rescue activities following	
an emergency evacuation?	
Ref. EC P/E12.13	
13.2.1.12 Are provisions implemented to protect	
workers involved in response and cleanup?	
Does this include measures to ensure that	
security, fire, medical, and other response	
personnel are protected from exposure to	
hazards during the course of their movements	
while supporting response?	
Ref. EC P/E12.14	
13.3.1.3 Are applicable Protective Action	
Criteria (PACs) used in protective action (e.g., sheltering, evacuation) decision-making for the	
actual or potential release of hazardous materials	
to the environment?	
For radioactive materials, are Protective Action	
Guide (PAGs) promulgated by the EPA used?	
Does the site use the following PACs for toxic	
chemicals (listed in order of preference): Acute	
Exposure Guideline Levels (AEGLs)	
promulgated by EPA; ERPGs published by the American Industrial Hygiene Association; and	
Temporary Emergency Exposure Limits	
(TEELs) developed by DOE?	
(1222) 40 (13500 0) 2 02.	
Does the site follow the following for hazardous	
biological materials: PACs are considered	
exceeded and immediate protective actions are	
required for any actual or potential release of	
agents or toxins outside of secondary	
containment barriers. Long term PACs are	
specified by state or local public health officials?	
Ref. EC P/E12.2	

13.3.1.4 Is habitability of onsite facilities,	
including emergency facilities, periodically	
determined using dosimetry and survey	
instruments, and relocation/evacuation measures	
are taken, if necessary?	
Ref. EC P/E12.15	
13.3.1.5 Are actions that may be taken to	
increase the effectiveness of PAs (i.e., heating,	
ventilation, and air conditioning (HVAC)	
shutdown during sheltering) implemented in a	
timely and efficient manner?	
Ref. EC P/E12.16	
13.3.1.6 Is access to and egress from actual or	
potentially contaminated areas, or the site,	
monitored and controlled?	
Are people, vehicles, and equipment effectively monitored before leaving contaminated areas	
· ·	
and the site, if possible; or, upon arrival at	
designated decontamination, relocation, or	
assembly areas?	
Is sufficient staffing and equipment available to	
activate designated monitoring locations?	
Ref. EC P/E12.17	
13.3.1.7 Do emergency facilities, equipment,	
personnel, and implemented methods and	
criteria provide effective decontamination of	
personnel and equipment for various levels and	
types of contamination (e.g., skin	
contamination)?	
Ref. EC P/E12.18	
13.3.1.8 Are candidate PARs coordinated with	
offsite authorities and well-defined geographic	
areas for sheltering and evacuation, special	
needs areas or special populations, and	
evacuation routes are readily available?	
Ref. EC P/E12.20	
13.3.1.9 Are ingestion pathway PARs	
formulated when appropriate and communicated	
to offsite authorities?	
Ref. EC P/E12.21	
13.3.1.10 Are records of personnel exposures to	
hazardous materials (radiological, chemical and	
biological) effectively controlled, monitored,	
and maintained?	
Ref. EC P/E12.29	
13.3.1.11 Are the names of individuals	
surveyed, the extent of any contamination found,	
the instruments used and the methods employed,	
and results of any decontamination efforts	
recorded?	
Ref. EC P/E12.30	
204	

204

13.3.1.12 Are contaminated individuals	
scheduled for follow-up actions (e.g.,	
subsequent whole body counts and/or bio-	
assays)?	
Ref. EC P/E 12.31	

3.15 Element 14: Emergency Medical Support

3.15.1. Description

Medical support for contaminated or injured personnel must be planned and promptly and effectively implemented. Arrangements with offsite medical facilities to transport, accept, and treat contaminated, injured personnel must be documented. (14.1.1)

Reference DOE Order 151.1C, Attachment 2, Contractor Requirements Document Section 15.

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Vol. IV, Section 8

Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.15.2. Typical Compliance Problems

Arrangements with offsite medical responders to accept and treat contaminated injured persons are to clear and effective.

Patient information is not shared between health care providers.

Medical response time is not adequate.

Information and training not provided to offsite medical responders regarding handling contaminated injured from site.

Coordination problems between medical responders and radiological protection personnel involving contaminated injured personnel.

Coordination problems between security and medical responders effect response time.

Employee medical records and treatment history is not available to emergency medical responders.

3.15.3. Instructions to Evaluator: DOCUMENT/RECORDS REVIEW **NOTES** Review site emergency plan and procedures pertaining to emergency medical planning and response. Review the Site Medical Plan. Review agreements with ambulance, Life flight, and hospitals. Review training records of site emergency medical personnel. Review records of information and training provided to offsite emergency medical organizations. 14.1.1 Is medical support for contaminated or injured personnel planned to be promptly and effectively implemented? Are arrangements with offsite medical facilities to transport, accept, and treat contaminated, injured personnel documented? Ref. DOE O 151.1C, CRD Section 15 14.1.1.1 Do standing orders/protocols ensure that patients are transported to the receiving facility best equipped to provide appropriate level of care for patent's condition? Ref. EC P 13.5

14.3.1.2 Are arrangements with offsite medical	
14.5.1.2 Are arrangements with offsite medical	
facilities to transport, accept, and treat	
contaminated, injured personnel established,	
documented, and periodically reviewed?	
Ref. EC P13.16	
14.3.1.3 Are onsite and offsite medical	
personnel offered information and training on	
facility-specific hazardous materials and offered	
opportunities for participation in drills and	
exercises in advance of emergencies?	
Ref. EC P13.18	
14.3.1.4 Are biosafety surveillance plans	
established for detecting unusual medical events,	
and are specific responsibilities for surveillance	
and reporting identified?	
Ref. EC P13.19	
Observations by Evaluators	Notes
Observe emergency medical response during	TYOUS
an emergency exercise (activation, response	
time, triage, assessment, contamination	
control, etc.)	
Observe emergency medical facilities and	
vehicles used during response.	
Observe use of equipment used by emergency	
medical personnel.	
Observe emergency medical communications	
and interfaces with emergency management,	
incident command, IH, RP, security, human	
resources, offsite medical support services.	
resources, offsite medical support services. 14.1.1.5 Are provisions for response to	
14.1.1.5 Are provisions for response to	
14.1.1.5 Are provisions for response to emergency medical situations and medical	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented?	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1 14.1.1.6 Is their assurance that security clearance	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1 14.1.1.6 Is their assurance that security clearance issues do not impede medical treatment or	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1 14.1.1.6 Is their assurance that security clearance issues do not impede medical treatment or transport of injured personnel?	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1 14.1.1.6 Is their assurance that security clearance issues do not impede medical treatment or transport of injured personnel? Ref. EC P/E13.10	
14.1.1.5 Are provisions for response to emergency medical situations and medical treatment of injured personnel implemented? Ref. EC P/E13.1 14.1.1.6 Is their assurance that security clearance issues do not impede medical treatment or transport of injured personnel? Ref. EC P/E13.10 14.1.1.7 Is there coordination between onsite	
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14.1.1.9 Do ambulance crews initiate	
communications with receiving medical	
facilities while en route?	
Ref. EC P/E13.6	
14.1.1.10 During an event involving the release	
of hazardous biological material, are there	
provisions for medical personnel to assist in	
release detection/confirmation, consequence	
assessment, and development of protective	
actions?	
Ref. EC P/E13.8	
14.1.1.11 Are onsite and offsite medical	
facilities outfitted and staffed to utilize	
specialized equipment and supplies specific to	
onsite hazards?	
Ref. EC P/E13.12	
14.2.1 Is medical treatment provided for	
mass casualty situations in accordance	
with DOE Order 440.1A?	
Ref. DOE O 151.1C, Attachment 2 CRD,	
Section 15a	
14.2.1.1 Are employee medical records and	
treatment history readily available and accessed	
as needed?	
Ref. EC P/E13.4	
14.2.1.2 Do onsite personnel who respond to a	
medical emergency show proficiency in first aid	
or emergency medical treatment comparable	
with those of any offsite teams employed and	
are they equally adequately equipped?	
Ref. EC P/E13.3	
14.3.1.5 Are personnel, vehicles, facilities and	
equipment adequate for treating and transporting	
injured, contaminated or exposed individuals in	
a safe and effective manner?	
Ref. EC P/E13.14	
14.3.1.6 Do onsite and offsite medical and	
emergency medical technician personnel use	
required equipment for assessing patient	
conditions, including PPE and medical service	
protective clothing?	
Ref. EC P/E13.14	
14.3.1.7 Is exposure and contamination	
information sent with victims, and expert	
technical support provided to the receiving	
hospital(s)?	
Ref. EC P/E13.14	

14.3.1.8 Are onsite radiation protection and IH personnel and infectious disease specialists properly equipped to assist medical and EMT staff in performing patient survey, decontamination, contamination and exposure control, urine and fecal analysis, and in-vivo counting methods. Ref. EC P/E13.13 14.3.1.9 Are proper contamination control procedures implemented in handling injured and contaminated personnel; and were decontamination facilities available and adequately equipped? Ref. EC P/E13.13 14.3.1.10 Is the veterinary profession involved in biosafety surveillance activities, as appropriate? Ref. EC P13.19 14.3.1.11 Are key indicators and medical surveillance baselines for agent/toxin effectively implemented? Ref. EC P13.19 14.3.1.12 Is there an information system installed at biosafety facilities for patient monitoring, management, and tracking?
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Ref. EC P13.20
14.3.1.13 Are key indicators and medical
surveillance baselines for facility-specific
agents/toxins provided to offsite medical
surveillance programs for detecting unusual
medical events that may have resulted from a
release at a DOE/NNSA biosafety facility?
Ref. EC P13.21

3.16 Element 15: Emergency Public Information (EPI)

3.16.1. Description

Accurate, candid, and timely information must be provided to workers, the news media, and the public during an emergency to establish facts and avoid speculation. Emergency public information efforts must be coordinated with DOE and NNSA (if appropriate); State, local, and Tribal governments; and Federal emergency response organizations, as appropriate. Workers and the public must be informed of emergency plans and planned protective actions before emergencies. (15.1.1)

Reference DOE Order 151.1C Attachment 2, Contractor Requirements Document Section 16.

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 9

Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.16.2. Typical Compliance Problems

EPI cadre does not participate with other members of the ERO in drills and exercises.

Initial news releases are not issued within an hour following an event.

News releases contain inaccuracies and are not timely.

Technical briefers and spokespersons do not use plain English during briefings.

EPI cadre does not understand or follow information approval processes and rumor control.

EPI cadre does not understand onsite hazards and their potential effect on public health and safety.

Reluctance to activate the JIC.

JIC organization without offsite coordination or input.

A DOE official does not attend press briefings.

EPI personnel lack ready access to information and tools needed.

Inadequate workspace and resources for media at the JIC.

Memoranda of agreement between organizations do not include adequate detail on roles, responsibilities, authorities and provisions for providing and maintaining equipment in support of the EPI program.

Plans are not clear and documented for providing information/education to the public and media on emergency planning and protective actions.

Performance deficiencies identified during drills, exercises, tabletops and assessments are not corrected.

Adequate 24 hour staffing of JIC functions is not provided consistent with the nature, severity, duration and public/media perception of the event.

3.16.3. Instructions to Evaluator:

DOCUMENT/RECORDS REVIEW	NOTES
Review site emergency public information plan	
and procedures.	
Review agreements with offsite agencies for	
joint information center use and participation.	
Review agreements with DOE regarding	
information center management and	
information release.	
Review roster of personnel assigned to	
emergency public information positions.	
Review records of news releases prepared for	
emergencies/exercises.	
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Review records of training for emergency public information personnel and	
spokespersons.	
Review plans, provisions and documents for	
educating the public, employees and news	
media about emergency plans, protective	
actions.	
15.1.1.1 Prior to emergencies, are workers and	
site personnel informed of emergency response	
plans, response capabilities and planned	
protective actions?	
Ref. EC P14.29	
15.1.1.2 Is continuing education provided to the	
area news media for the purpose of acquainting	
the media with the facility, management	
personnel, facility hazards, emergency plans,	
and points of contact?	
Ref. EC P14.30	
15.1.1.3 In coordination with state and local	
governments, is information disseminated	
periodically to the public regarding facility	
hazards, how they will be alerted and notified of	
an emergency, what their actions should be in	
the event of an emergency, and points of contact	
for additional information?	
Ref. EC P14.31	
15.1.1.4 Are internal and external organizational	
relationships for emergency public information	
documented and maintained in the public	
information program?	
Ref. EC P/E14.32	
15.2.1 Did the contractor prepare an	
Emergency Public Information Plan? (The	
same plan may cover multiple facilities.)	
Ref. DOE Order 151.1C Attachment 2, CRD	
Section 16a	
15.2.1.1 Is the EPI program integrated with	
facility emergency management program plans	
and procedures?	
Ref. EC P14.28	

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15.2.2 Is an EPIP plan in place that provides:	
Identification of personnel, resources,	
facilities, and coordination procedures	
necessary to provide emergency public	
information?	
A program for training and exercises of	
personnel who will interact with the media?	
A methodology for informing workers and	
the public of DOE/NNSA emergency plans	
and protective actions, before and during	
emergencies?	
Coordination of public information efforts	
with state, local, and tribal governments, and	
Federal emergency response plans, as	
appropriate?	
Ref. DOE Order 151.1C Attachment 2, CRD	
Section 16a(1)	
15.2.2.1 Is a list of 24-hour media points of	
contact available and maintained current?	
Ref. EC P14.33	
15.2.3 Does the EPI program have provisions	
in place to establish a media center—a designated location where Cognizant Field	
Element and contractor personnel can	
conduct the necessary briefings and press	
conferences regarding an OE?	
Ref. DOE Order 151.1C Attachment 2, CRD	
Section 16a(2)	
15.2.9 Is an emergency public information	
communications system established among	
Headquarters, Cognizant Field Element, and	
on-scene locations?	
Ref. DOE Order 151.1C Attachment 2, CRD	
Section 16a(8)	

15.3.1 The contractor at DOE/NNSA
Operational Emergency Hazardous Material
Program facilities must also have provisions
in place to establish a Joint Information
Center (JIC). A JIC is a working location,
where multiple jurisdictions gather, process
and disseminate public information during an
emergency.

Are there provisions for a JIC?

Is the JIC adequately staffed with personnel trained to serve as spokesperson and news writer?

Are personnel assigned to the JIC to provide support in media services, public inquiry, media inquiry, JIC management and administrative activities, and media monitoring?

Are persons with technical expertise related to the emergency and with spokesperson training also assigned to the JIC?

Is the JIC established, directed, and coordinated by the senior Cognizant Field Element public affairs manager or a designee?

Ref. DOE Order 151.1C Attachment 2, CRD Section 16b

15.3.2 The contractor providing personnel for the Departmental emergency response assets [the Aerial Measuring system (AMS), the Accident Response Group (ARG), the National Atmospheric Release Advisory Center (NARAC), the Federal **Radiological Monitoring and Assessment** Center (FRMAC), the Nuclear Emergency support Team (NEST), the Radiological Assistance Program (RAP), and the Radiation Emergency Assistance **Center/Training Site (REAC/TS)] must** apply the Emergency Public Information Plan during deployment of the assets. Are provisions in place to do so? Ref. DOE Order 151.1C Attachment 2, **CRD Section 16c**

Observations by Evaluators	Notes
Interview persons responsible for EPI program	
maintenance.	
Interview personnel on the EPI position roster.	
Observe EPI performance during drill/exercise	
at the media information center, joint	
information center, EOC, and locations where	
there may be interaction with news media.	
Observe EPI personnel interaction with	
emergency managers.	
15.1.1 Was accurate, candid, and timely	
information provided to workers, the news	
media, and the public during an emergency to	
establish facts and avoid speculation?	
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Were emergency public information	
efforts coordinated with DOE and NNSA	
(if appropriate); State, local, and Tribal	
governments; and Federal emergency	
response organizations, as appropriate?	
response organizations, as appropriate:	
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Were workers and the public informed of	
emergency plans and planned protective	
actions before emergencies?	
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Ref. DOE Order 151.1C Attachment 2, CRD	
Section 16	
15.1.1.5 Is information distributed to workers,	
site personnel, and the public regarding an operational emergency:	
Accurate, candid, and understandable?	
Current and timely?	
Provided to ensure the health and safety of	
workers and the public?	
Provided to establish facts, and avoid rumors	
and speculation?	
Responsive to public concern and information	
needs; and	
Consistent with the requirements of the Freedom	
of Information Act and the Privacy Act?	
Ref. EC P/E14.1	
15.1.1.6 Is information released to the public	
through the news media regarding the	
emergency accurate and relevant?	
Ref. EC P/E14.6	
15.1.1.7 Was an initial press statement released	
as soon as possible, but within one hour of the	
event?	
Ref. EC P/E14.6	
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15.1.1.8 Was the frequency and content of news	
conferences consistent with information needs of	
the public and media?	
Ref. EC P/E14.6	
15.1.1.9 Were press briefings held with regular	
frequency and whenever new or breaking	
information was available concerning	
emergency conditions, protective actions or	
response?	
Ref. EC P/E14.6	
15.1.1.10 Were technical briefers utilized who	
are knowledgeable and effective in	
communicating with the news media?	
Ref. EC P/E14.6	
15.1.1.11 Is the emergency public information	
staff proactive in obtaining emergency	
information from the command center or EOC?	
Ref EC P/E14.7	
15.1.1.12 Are medical personnel associated with	
the Biosafety program involved in the	
development of materials to be used in news	
releases to ensure that characterization of the	
hazard is conveyed accurately?	
Ref. EC P/E14.8	
15.1.1.13 Was information (written and verbal)	
released to the news media coordinated with	
DOE and other Federal, state, tribal and local	
response organizations, as appropriate?	
Ref. EC P/E14.20	
15.2.2.2 Do functions and staff of the EPI	
organization include:	
Information collection, coordination, protection,	
dissemination, and monitoring and analysis of	
media coverage, public concerns and	
information needs?	
Functions and staffing consistent with the	
nature, severity, duration and public and media	
perception of the event or condition?	
Trained spokespersons that provide support in	
media interface?	
A news writer and other trained personnel who	
provide support in media services, public	
inquiry, media inquiry, management and	
administrative services, and media monitoring?	
Ref. EC P/E14.4	
15.2.2.3 Are rumors and misinformation	
detected, controlled, and corrected?	
Is accurate information disclaiming rumors and	
correcting misinformation incorporated in media	
briefings and press releases as necessary?	
Ref. EC P/E14.5	
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15.2.4 In situations involving classified or unclassified controlled information, does the contractor provide sufficient publicly releasable information to explain the emergency response and protective actions required for the health and safety of workers and the public? Ref. DOE Order 151.1C Attachment 2, CRD Section 16a(3) 15.2.5 Are public announcements in areas involving classified or unclassified controlled information reviewed by the appropriate official before release to ensure that no classified or unclassified controlled information is contained in the announcement? Ref. DOE Order 151.1C Attachment 2, CRD Section 16a(4) 15.2.5.1 Does an authorized derivative Classifier review news releases or announcements before release to the public to ensure that no information is provided that may present a security risk? Ref. EC P/E14.9 15.2.6 When directed by the Cognizant Field Element, is a contractor public information officer assigned to the emergency public information response team involved in a significant offsite response deployment? Ref. DOE Order 151.1C Attachment 2, CRD Section 16a(5) 15.2.6.1 Is a public information officer assigned to a facility/site or activity emergency response team deployed offsite to provide mutual aid to a significant response? Ref. EC P/E14.24 15.2.7 The DOE/NNSA (as appropriate) Director of Public Affairs and the Headquarters Emergency Manager must be informed of all DOE/NNSA emergency public information actions. Are these notifications made as soon as practicable? Ref. DOE Order 151.1C Attachment 2, CRD	47047 4 4 1 1 1 10 1	
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Section 16a(6)	Section 16a(6)	
	Director of Public Affairs and the Headquarters Emergency Manager must be informed of all DOE/NNSA emergency public information actions. Are these notifications made as soon as practicable? Ref. DOE Order 151.1C Attachment 2, CRD	

15.2.8 Are initial news releases or public statements approved by the Cognizant Field Element official responsible for emergency public information review and dissemination? Following initial news releases and public statements, are updates coordinated with the DOE/NNSA (as appropriate) Director of Public Affairs and the Headquarters Emergency Manager? Ref. DOE Order 151.1C Attachment 2, CRD Section 16a(7)
15.3.1.1 Is the JIC adequately staffed with
personnel trained to serve as spokesperson and
news writer?
Ref. EC P/E14.12
15.3.1.2 Are persons with technical expertise
related to the emergency and with spokesperson
training assigned to the JIC?
Ref. EC P/E14.12
15.3.1.3 Are personnel assigned to the JIC to
provide support in media services, public
inquiry, media inquiry, JIC management and
administrative activities, and media monitoring.
Ref. EC P/E14.12
15.3.1.4 Does the JIC support response to public
inquiries in a timely manner?
Ref. EC P/E14.12
15.3.1.5 Are provisions in place and
implemented to detect, correct and control
rumors and misinformation?
Ref. EC P/E14.12

15.3.1.6 Is the designated Joint Information Center (JIC):	
Available, equipped, maintained and controlled to accommodate members of the news media, DOE, contractor, and offsite agency representatives, and to facilitate the preparation and coordination of emergency information release to the public through the news media?	
Does the JIC provide adequate space, equipment, communications lines, security provisions, and information resources to accommodate personnel (both media and staff) and to accomplish required functions?	
Staff includes trained spokespersons with technical expertise related to the emergency?	
Supports response to public inquiries in a timely manner?	
Are provisions in place to detect, correct, and control rumors and misinformation? Ref. EC P/E14.11	
15.3.1.7 Is an alternate JIC available in the event that the primary JIC becomes uninhabitable? Ref. EC P/E14.13	
15.3.1.8 Is JIC access control adequate and there is a means to readily identify media representatives and staff? Ref. EC P/E14.14	
15.3.1.9 Does the organization prepare relevant information concerning affected facilities, emergency plans, hazards and logistics and is this provided to news media in the JIC? Ref. EC P/E14.15	
15.3.1.10 Are appropriate visual aids available and used for briefing news media regarding events, impacted areas, consequences and protective actions? Ref. EC P/E145.16	
15.3.1.11 Do the management team and outside agency representatives effectively, openly, and readily share and coordinate information? Ref. EC P/E14.17	

3.17 Element 16: Termination and Recovery

3.17.1. Description

An Operational Emergency can be terminated only after a predetermined set of criteria has been met and termination has been coordinated with offsite agencies. Recovery from a terminated Operational Emergency must include: communication and coordination with State, Tribal, and local government and other Federal agencies; planning, management, and organization of the associated recovery activities; and ensuring the health and safety of the workers and public. (16.1.1)

Reference DOE Order 151.1C Attachment 2, Contractor Requirements Document Section 17
Reference Emergency Management Guide, DOE G 151.1-1, Part 1, Volume IV, Section 10
Reference Emergency Management Guide DOE G 151.1-1, Part 1, Volume III, Appendix D, Evaluation Criteria

3.17.2. Typical Compliance Problems

Termination and recovery procedures do not include adequate criteria to support decision-making.

Recovery is not coordinated as required with offsite agencies.

Procedures do not address coordination between emergency management and organizations responsible for event investigation.

Personnel are not trained on event investigation.

Rescue and recovery risks are not adequately assessed.

Emergency is downgraded after categorization/classification.

DOE guidelines for emergency exposure situations are not followed.

3.17.3. Instructions to Evaluator:

DOCUMENT/RECORDS REVIEW	NOTES
Review plans and procedures for emergency	
termination and recovery.	
Review training records for personnel involved	
in recovery decision-making.	
Review relevant incident reports.	
Review plans and training in incident	
investigation.	
Review memoranda of agreement for reference	
to recovery coordination.	
16.1.1 Do procedures support the	
requirement that an Operational Emergency	
can be terminated only after a predetermined	
set of criteria has been met and termination	
has been coordinated with offsite agencies?	
Do procedures support the requirement that	
recovery from a terminated Operational	
Emergency must include: communication and	
coordination with State, Tribal, and local	
government and other Federal agencies;	
planning, management, and organization of	
the associated recovery activities?	
Reference DOE Order 151.1C Attachment 2,	
CRD Sec 17	

16.1.1.1 Is there an approved, predetermined set of criteria for terminating a classified OE [e.g., an airborne release of (or loss of control over) hazardous material]?

Selected termination criteria may include the following:

Recovery plan is developed;

Recovery staff is identified;

Event scene/facility is in stable condition;

Event scene/facility is isolated and can be preserved;

Resources are available to begin recovery activities;

All releases of hazardous materials are ended or below level of regulator concern;

Accountability of all personnel is complete; Contaminated areas are identified, isolated and secured:

All injured and contaminated personnel have been treated and transported;

Notification of next-of-kin of victims;

Protective actions have been adjusted according to extended conditions;

Recovery manager and staff have been fully briefed by the Emergency Director; and Notifications are made to DOE, other Federal, state, and local response organizations. Ref. EC P/E15.4

16.2.1 Do contractor plans ensure the following:	
Coordination of termination decision with state, tribal, and local agencies and organizations responsible for offsite emergency response and notification?	
Establishment of criteria for resumption of normal operations?	
Do procedures for recovery also include provisions for investigation of the root cause(s) of the emergency and corrective action(s) to prevent recurrence in accordance with Departmental requirements (e.g., see DOE O 225.1A, Accident Investigations, dated 11-26-97, DOE O 231.1A, Environment, Safety, and Health Reporting, with Change Idated 6-3-04, and DOE 5480.19, Conduct of Operations Requirements for DOE Facilities, with Change 2, dated 10-23-01)? Reference DOE Order 151.1C Attachment 2,	
CRD Sec 17a	
16.2.1.1 Are provisions in place to perform accident assessment and investigation, consistent with event severity, including: root cause analysis, accident reporting, collection of event documentation, assessment of facility condition, and assessment of contamination effects if relevant? Ref. EC P/E15.13	

16.3.1 Did the contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities also— Establish predetermined criteria for termination of emergencies?	
Have the means for estimating exposure to hazardous materials and for protecting workers and the general public from exposure during reentry and recovery activities?	
Do recovery procedures include the following:	
Dissemination of information to Federal, State, Tribal, and local organizations regarding the emergency and possible relaxation of public protective actions;	
Planning for decontamination actions;	
Establishment of a recovery organization;	
Development of reporting requirements; and	
Establishment of criteria for resumption of normal operations;	
Have procedures been developed to not downgrade emergencies, once categorized, to a lower significance category unless the original categorization was incorrect?	
Reference DOE Order 151.1C Attachment 2, CRD Sec 17b	
16.3.1.1 Is each individual authorized to perform emergency actions likely to result in	
occupational doses exceeding the values of the	
limits provided at 10 CFR835.202(a) trained in	
accordance with 10 CFR835.901(b) and briefed	
beforehand on the known or anticipated hazards to which the individual will be subjected?	
10CFR835.1302(d)	
Observations by Evaluators	Notes
Interview personnel responsible for emergency classification and termination.	
Interview personnel who would be responsible	
for recovery operations.	
Observe use of termination criteria.	

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Observe communication with offsite agencies	
concerning termination and recovery.	
Observe recovery manager command, control,	
and decision-making.	
Observe decision-making on resumption of	
normal operations.	
Observe decisions and practices for protection	
of re-entry personnel, recovery workers,	
general employees and the public.	
16.1.1.2 Are recovery activities coordinated with	
Federal, tribal, state and local and other agencies	
and are they in compliance with their	
requirements?	
Ref. EC P/E15.15	
16.1.1.3 Is the risk of injury to those individuals	
involved in rescue and recovery operations	
minimized?	
Ref. 10CFR835.1302(a)	
16.1.1.4 Does operating management weigh	
actual and potential risks against the benefits to	
be gained?	
Ref. 10CFR835.1302(b)	
16.1.1.5 Is no individual required to perform a	
rescue action that might involve substantial	
personal risks?	
Ref. 10CFR835.1302(c)	
16.1.1.6 Do facility personnel estimate exposure	
to hazardous materials to protect workers and	
the public during reentry and recovery	
activities?	
Ref. EC P/E15.8	
16.1.1.7 Prior to terminating the emergency	
response, does the site ERO establish the	
recovery organization and determine the	
resources needed to begin recovery operations?	
Ref. EC P/E15.9	
16.1.1.8 Is the decision to terminate emergency	
response for an OE made by the site ERO and is	
it coordinate4d with all principle participating	
response organizations (i.e., state, local, tribal,	
DOE Headquarters, other participating Federal	
agencies)?	
Are internal and external communications that	
are associated with termination performed?	
Ref. EC P/E15.1	

16.1.1.9 Does the decision to terminate an OE not requiring classification formally announce or acknowledge that the situation is stabilized and that the response activity is ending or has been substantially scaled back? Are termination criteria observable associated with the event/condition? Ref. EC P/E15.2	
16.1.1.10 Is the beginning of the recovery phase marked by the termination decision and subsequent notifications that an event no longer constitutes an Operational Emergency? Ref. EC P/E15.10	

16.1.1.11 Does the plan and recovery organization address the following areas, as needed:

Dissemination of information to Federal, tribal, state, and local organizations?

Regarding the emergency and possible relaxation of protective actions?

Notifications associated with termination?

Accident assessment and investigation?

Recovery planning and scheduling; Repair and restoration?

Planning for clean-up and decontamination?

Waste management?

Regulatory (e.g., environmental) compliance; security; crime scene investigation?

Communication and notifications?

Development and approval of recovery procedures?

Replenish, repair or replace emergency equipment or consumables?

Health and safety (e.g., medical follow-up planning)?

Reporting requirements; and

Criteria for the resumption of normal operations? Ref. EC P/E15.12

16.2.1.2 Is an approved, predetermined set of	
criteria for terminating an OE not requiring	
classification met?	
Selected general termination criteria that apply	
may include the following:	
Recovery plan is developed	
Recovery staff is identified	
Event scene/facility is in stable condition	
· ·	
Event Scene/facility is isolated and can be	
preserved	
Resources are available to begin recovery	
activities	
Notification of next of kin of victims	
Recovery manager and staff have been fully	
briefed by the ED	
Notifications are made to DOE/NNSA, other	
Federal, tribal, state and local response	
organizations.	
Ref. EC P/E15.5	
16.2.1.3 Are additional OE-specific criteria for	
emergencies not requiring classification met?	
Ref. EC P/E15.6	
16.2.1.4 Does the recovery plan to return the	
affected facility/area to normal operations	
following the termination of the OE developed	
by the recovery organization and does it depend	
on (i.e. is commensurate with) the severity and	
nature of the emergency event or condition?	
Ref. EC P/E15.11	
16.2.1.5 Is the decision to terminate a classified	
OE based on the need for the ERO to remain	
fully active to monitor and manage the situation?	
Is there a declaration that a decision has been	
reached that the full ERO is no longer needed	
and the ERO may now begin to reduce its	
support? Do termination criteria represent the	
decision criteria to be satisfied?	
Ref. EC P/E15.3	
16.2.1.6 Are termination criteria for hazardous	
biological material release OE similar to an OE	
that requires classification, such as the release of	
toxic or radioactive materials? Is the decision to	
terminate a biological OE based on the	
perceived need for the ERO to remain fully	
active to monitor and manage the situation? Is	
termination a declaration that a decision has	
been reached that the full ERO is no longer	
needed and the ERO may not begin to reduce its	
support?	
Ref. EC P/E15.7	

16.2.1.7 Is the root cause of emergencies	
investigated and are corrective actions	
developed to prevent recurrence according to	
Departmental Requirements?	
Ref. EC P/E15.14	
16.3.1.2 Does the organization following DOE	
guidelines for Emergency Exposure Situations?	
DOE G 441.1-1A identifies regulatory	
provisions and recommended guidance	
documents for achieving compliance with	
10CFR835. For emergency exposure situations,	
DOE G 441.1-1A identifies DOE O 151.1 as the	
guidance document. •DOE G 151.1-1, Volume	
IV provides guidance in the form of dose criteria	
and judgment factors for three emergency	
exposure situations: saving of human life,	
recovery of deceased victims; and protection of	
health and property.	
Refs.10CFR835.1302; DOE G 441.1-1A; DOE	
G 151.101, Volume IV	

4. ACCREDITATION ASSESSOR TRAINING PROGRAM

DOE G 151-1, Volume XY