

**QUESTION: Are there new requirements for approval of site/facility emergency management documents in DOE O 151.1C? Why do we have to send copies of approved documents to the Headquarters?**

**ANSWER:**

There are new and restated requirements in DOE O 151.1C, *Comprehensive Emergency Management System* (11-02-05) concerning Cognizant Field Element approval of emergency management documents [e.g., technical planning basis (Hazards Surveys, EPHAs, and EPZs), emergency plans]. The requirements address recommendations by the Department of Energy's Office of the Inspector General (OIG)<sup>1</sup> that key emergency management documents be coordinated with DOE.

The following requirements for **Cognizant Field Element Manager** approval of emergency management documents can be found in DOE O 151.1C:

- Approve site Emergency Plans, including annual updates, and submit approved site Emergency Plans to the Director, Office of Emergency Operations and the Program Secretarial Officer(s);
- Approve and submit approved Emergency Planning Zones to the Director, Office of Emergency Operations, and the Program Secretarial Officer(s);
- Review and approve Emergency Readiness Assurance Plans (ERAPs) that cover facilities under their supervision;
- Review and approve EPHAs and Hazards Surveys and forward the approved EPHAs and/or Hazards Surveys to the Program Secretarial Officer(s) and the Director, Office of Emergency Operations; and
- Approve site exercise packages prior to an exercise.

Each of these requirements for approval of key emergency management documents at the local, DOE line management level includes providing the approved documents to both the Program Secretarial Officer(s) and to the Office of Emergency Operations. This provides the Program Office with information needed to execute its responsibilities under DOE oversight policy in DOE P 226.1, *Department of Energy Oversight Policy* (6-10-05) and to influence improvements in areas that the Office of Independent Oversight routinely finds lacking during its inspections. Copies provided to the Office of Emergency Operations allow us to monitor conformity and look for complex-wide patterns and/or common problems in performing emergency management functions that we can address through improved policy, requirements, guidance, and training. The technical planning basis documents and emergency plans provide the HQ EMT access to facility/site hazards information and response plans during an emergency response,

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<sup>1</sup> DOE/IG-0594, Inspection Report. Emergency Medical Coordination Memorandum of Agreement at Brookhaven National Laboratory (March 2003); Recommendation 4.

limiting the need to obtain this background information from the site. These documents should be submitted on a CD for electronic storage but may be submitted on hard copy.