

**QUESTION: Is it acceptable for a site to define the entire site as a “facility” in order to meet the Order requirement for an annual facility-level ERO exercise?**

**ANSWER:** DOE O 151.1C Contractor Requirements Document (CRD) contains the following requirement for an annual exercise of each facility emergency response capability [i.e., *facility-level* Emergency Response Organization (ERO) capability]:

Each DOE/NNSA facility subject to this CRD paragraph 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 three years. [DOE O 151.1C, Attachment 2, 6.b (1)]

It would not be acceptable to define an entire site as a facility simply to meet the Order requirement for annual facility-level ERO exercises. The basic question is: Are there facility-specific response capabilities on site? Essentially, facility-level implies the lowest level of the response organization whose responsibilities include response to an emergency at a specific facility or (small) group of facilities. For example, *facility response capabilities* may include control of process operations, response activities of local facility health physicists, radiation control or HAZMAT response personnel, and implementation of local protective actions (e.g., building evacuations or sheltering, ventilation manipulation). If those capabilities exist, then they must be exercised every year.

If there are no facility response capabilities, then an annual site-wide exercise will suffice to satisfy the Order requirement; not because the site has been labeled as a “facility,” but because there are **NO** facility-specific response capabilities on the site, only site-wide response capabilities.