

QUESTION: DOE O 151.1C, Chapter IV, paragraph 3b(3)(b), contains the following requirement: “Site/facility-specific Emergency Action Levels must be developed for the spectrum of potential Operational Emergencies identified by the EPHA and must include protective actions corresponding to each Emergency Action Level (EAL).” Does this requirement mean that protective actions must be included explicitly in the EAL statement?

ANSWER: In retrospect, a better statement of the Order requirement would have been: Site/facility-specific Emergency Action Levels (EALs) must be developed for the spectrum of potential Operational Emergencies identified by the EPHA and there must be planned initial onsite Protective Actions (PAs) and offsite Protective Action Recommendations (PARs), as appropriate, associated with each EAL.

Both EALs and planned initial protective actions, PAs and PARs, are intended to speed the decision-making process so that actions to protect workers and the public are taken as quickly as possible. While EALs and protective actions are developed using the results of different steps in the EPHA process, it is strongly recommended that EALs statements and the planned initial protective actions eventually be integrated in the same emergency procedure. For example, initial protective actions could be added to a categorization/classification procedure that uses a table to present emergency indicators and emergency categorization/classification. If not included explicitly in the EAL statement, then the associated protective actions must be readily and *reliably* accessible within a minimum time frame (i.e., sufficient time to satisfy the Order requirement to categorize/classify within 15 minutes of emergency recognition).