

QUESTION: How is “facility” defined in the context of the annual facility-level ERO exercise requirement?

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)]

Facility is not specifically defined in DOE O 151.1C. However, in the Order and the Emergency Management Guide (EMG), the term *facility* is used in two distinct ways. First, a facility boundary is defined for classification purposes. Second, *facility* response capability represents the ERO components that respond to an emergency at a specific facility or group of facilities; the *site-level* ERO provides site-wide capabilities to respond to any facility or group of facilities on a site.

As used in the Order and EMG regarding the exercise requirements, facility response capability or facility-level Emergency Response Organization (ERO) capability represents the level of the ERO that responds to an emergency at a facility or group of facilities. Essentially, facility-level implies the lowest level of the response organization whose responsibilities include response to an emergency at a specific facility or 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). These responsibilities are in contrast to a site-level ERO that provides site-wide capabilities to respond to any facility or group of facilities on a site.