

**QUESTION: DOE Order 151.1C and its Contractor Requirements Document (CRD) require that contractors at all DOE/NNSA facilities conduct an annual self-assessment (self-evaluation) of their emergency management programs. Does the Order require that ALL of the emergency management Program Elements be self-assessed each year, or can the assessments be spread out over a number of years and still satisfy the Order requirement? What role do exercises play in satisfying the self-assessment requirement?**

**ANSWER:** DOE/NNSA contractors must conduct an annual self-assessment of their emergency management programs. This requirement is stated in DOE O 151.1C, Chapter X, 2. a.(1):

“(1) DOE/NNSA facilities and DOE/NNSA contractor-operated facilities must conduct an annual self-assessment of their emergency management programs. Self-assessment results must be documented in the ERAP submitted to the Cognizant Field Element.

The Contractors Requirements Document (CRD) contains a similar requirement in DOE O 151.1C, Attachment 2, 7.a.(1):

“The contractor at all DOE/NNSA facilities must implement a readiness assurance program consisting of evaluations, improvements and ERAPs.

a. Evaluations

(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.”

The intent of the Order is that ALL Program Elements of a DOE emergency management program be self-assessed by the contractor annually. The fifteen DOE Program Elements are discussed in the CRD: Technical Planning Basis [including Hazards Surveys and Emergency Planning Hazards Assessments (EPHAs)]; Program Administration; Training and Drills, Exercises; Readiness Assurance; Emergency Response Organization (ERO); Offsite Response Interfaces; Emergency Facilities and Equipment; Categorization and Classification; Notifications and Communications; Consequence Assessment; Protective Actions and Reentry; Emergency Medical Support; Emergency Public Information; and, Termination and Recovery. For evaluation efficiency and effectiveness, a site may choose to divide the elements further using a number of program element self-assessments greater than fifteen.

Although it is intended that all Program Elements be self-assessed annually, the scope of the annual self-assessment of each element does not necessarily include all aspects of the

associated programmatic or response tasks, as detailed in the evaluation criteria given in DOE G 151.1-3, Appendix D. A comprehensive readiness assurance program, which satisfies the Order requirement, may cover all aspects (e.g., all program-specific evaluation criteria) of the emergency management program over a number of years, up to, but not exceeding the Order requirement for a formal exercise program “to validate all elements of an emergency management program over a 5-year period.” (DOE O 151.1C, Attachment 2, CRD, para. 6, p. 9) The scope of the annual self-assessments and the program-specific time frame chosen will depend on facility/site characteristics, the spectrum of hazards, program and ERO size, etc.

Finally, the self-assessment requirement is not focused exclusively on program evaluations; exercise evaluations can and should be part of the self-assessment component of the total readiness assurance program for the facility/site. The excerpt from the CRD given above explicitly mentions both program and exercise evaluations in discussing self-assessments. In addition, the Emergency Management Guide (EMG), DOE G 151.1-3, Chapter 4, Section 4.7, page 4-41, states: “A *self-assessment* can be viewed as an evaluation (program or exercise) of an emergency management program performed and/or sponsored by the organization itself or by some level of the management of the organization responsible for evaluating the emergency management program.” Specifically, exercise evaluations provide response performance assessments which are complimentary to the more comprehensive, but not actual performance oriented, evaluations of response plans and procedures during program evaluations. (Cf., DOE G 151.1-3, Chapter 4).