

**OFFICE OF INDEPENDENT OVERSIGHT
OFFICE OF EMERGENCY MANAGEMENT OVERSIGHT
APPRAISAL PROCESS GUIDE**



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Preface

The Office of Independent Oversight (HS-60), within the Office of Health, Safety and Security, published the Appraisal Process Protocols to describe the philosophy, scope, and general procedures applicable to all independent oversight appraisal activities. The Office of Emergency Management Oversight (HS-63) prepared this companion volume as part of a continuing effort to enhance the quality and consistency of emergency management oversight appraisals of the Department's comprehensive emergency management system, hereinafter referred to as emergency management. When used in conjunction with the *Independent Oversight Appraisal Process Protocols*, this *Emergency Management Oversight Appraisal Process Guide* provides necessary guidance for conducting emergency management oversight appraisals. It also offers techniques, formats, and sample documents useful in planning for, conducting, and reporting the results of emergency management oversight appraisals.

This process guide describes the general process and principal activities that HS-63 will use for evaluating the effectiveness of both emergency management policies and U.S. Department of Energy (DOE)/National Nuclear Security Administration (NNSA) line management in implementing those policies throughout the Department.

As part of the continuing effort to improve the independent oversight process, HS-63 anticipates making periodic updates and revisions to this process guide in response to changes in DOE program direction and guidance, insights gained from independent oversight activities, and feedback from customers and constituents. Therefore, users of this process guide, as well as other interested parties, are invited to submit comments and recommendations to the Director, Office of Emergency Management Oversight, at Steven.Simonson@hq.doe.gov.

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Acronyms

CATS	Corrective Actions Tracking System
DNFSB	Defense Nuclear Facilities Safety Board
DOE	U.S. Department of Energy
EMS	Emergency Management System
EOC	Emergency Operations Center
EPHA	Emergency Planning Hazards Assessment
ERO	Emergency Response Organization
HS-60	Office of Independent Oversight
HS-63	Office of Emergency Management Oversight
NNSA	National Nuclear Security Administration
QRB	Quality Review Board
SO	Secretarial Officer

Definitions

Appraisal: An umbrella term used within the Office of Independent Oversight that generally refers to any oversight activity conducted by any of Independent Oversight's component offices. For HS-63, comprehensive emergency management program inspections, emergency response exercise evaluations, follow-up evaluations on previously identified emergency management program weaknesses, special studies, and special reviews are all forms of appraisals.

Corrective Action Plan (CAP): A document that provides, for each finding or deficiency addressed, a thorough analysis of the underlying causal factors to determine whether systemic program weaknesses exist, steps to address the cause(s) of the finding, detailed descriptions of the corrective action(s) to resolve each finding and prevent recurrence, and a general outline for the conduct of the proposed independent corrective action effectiveness review. For each corrective action, the document shows the responsible person(s) and organizations, the date of action initiation, key milestones, the date of expected completion of the action, how actions will be tracked to closure, deliverable(s) that will signify completion, and the mechanism(s) for verifying closure. A corrective action plan may also provide a detailed discussion of longer-term enhancements and upgrades, as well as descriptions of actions taken and compensatory measures already in place.

Deficiency: A deficiency is an inadequacy that is found during an appraisal that does not meet the intent of a DOE policy, Federal or state law, or other applicable requirement (e.g., contract, standard). Deficiencies may serve as the basis for one or more findings. [470.2B]

Emergency Action Levels: Criteria used to classify hazardous material operational emergencies according to event severity. They may be stated in terms of either specific symptoms of safety degradation or the occurrence of a broadly defined event or condition. The term may also be applied to thresholds that identify Departmental operational emergencies not requiring further classification.

Emergency Planning: Includes identification of hazards and threats, development of hazard mitigation, protocol development, development and preparation of emergency plans and procedures, and identification of personnel and resources needed for an effective response.

Emergency Planning Hazards Assessment: A quantitative analysis that includes the identification and characterization of hazardous materials specific to a facility/site, analyses of potential accidents or events, and evaluation of potential consequences. Conclusions form the bases of proposed protective actions, emergency action levels, and emergency planning zones.

Emergency Plans: Document the emergency management program and describe the provisions for response to an Operational Emergency.

Emergency Plan Implementing Procedures: Specify the steps necessary to implement emergency plans.

Emergency Preparedness: Includes the acquisition and maintenance of resources, training, drills, and exercises.

Emergency Response: Includes the application of resources to mitigate consequences to workers, the public, the environment, and national security, and the initiation of recovery from an emergency.

Exit Briefing: A summary of inspection results given to DOE/NNSA management and the responsible DOE/NNSA contractor(s). Exit briefings are normally conducted by the Independent Oversight team before departing the inspected facility.

Findings: Findings are used to indicate significant deficiencies or safety issues that warrant a high level of attention on the part of management. If left uncorrected, such findings could adversely affect the DOE mission, the environment, the safety or health of workers or the public, or national security. Findings may identify aspects of a program that do not meet the intent of DOE policy. Findings are clearly identified in the appraisal report, define the specific nature of the deficiency and whether it is localized or indicative of a systemic problem, and identify which organization is responsible for corrective actions. Findings require resolution by management through a formal corrective action process.

Hazards Survey: A qualitative examination of the events or conditions specific to the facility/site that may require an emergency response.

Limited Scope Performance Tests: Focused tests used to evaluate selected portions of a site's emergency response framework and execution as they exist at the time of the test.

Mitigation: The action(s) necessary to minimize, to the greatest extent possible, the adverse effects of an incident, or the measures that are in place (or taken) to wholly or partially compensate for weaknesses in program implementation.

Operational Emergency: An event or condition requiring a time-urgent response from outside the immediate scene or area of the incident at the affected site/facility. Such an event or condition causes, or could cause, serious health and safety impacts to workers or the public, serious detrimental effects on the environment, direct harm to people or the environment as a result of degradation of security or safeguards conditions, or loss of control over hazardous materials.

Protective Action Criteria: Pre-determined levels, expressed in terms of doses, exposures, or concentrations, at which pre-determined steps to protect the public and workers should be taken.

Readiness Assurance: Includes assessments and documentation to ensure that stated emergency capabilities are sufficient to implement emergency plans.

Recovery: Includes planning for and taking the actions necessary to return the facility/operations to normal following termination of an emergency.

Safety Issue: A condition that, if left uncorrected, could adversely impact the environment, or the safety and health of workers or the public, or the DOE mission. Under DOE Order 470.2B, *Independent Oversight and Performance Assurance Program*, and DOE Order 414.1C, *Quality Assurance*, conditions warranting corrective actions are reported as findings.

Secretarial Officer: The Assistant Secretary/Director responsible for a set of facilities or laboratories (e.g., Lawrence Livermore National Laboratory or Test Reactor Area at Idaho National Laboratory) within a multi-program field office.

Trusted Agent: A representative of the organization being evaluated who is assigned to assist in planning a limited-scope performance test and procuring the necessary facilities or personnel. The trusted agent has full organizational decision-making authority in matters concerning the content and conduct of limited-scope performance tests. He/she is privy to the full scenario and all other test plans, and is required to verify, on behalf of his/her organization, the plausibility and fairness of the scenario and test plan. Trusted agents may also be required in specific technical areas to provide information necessary to the development of a scenario. In such cases, those trusted agents are privy only to that scenario information necessary for them to provide meaningful information.

Validation: The process by which Independent Oversight ensures the factual accuracy of collected data and ensures that identified deficiencies, and their impacts, are effectively communicated to responsible managers and organizations.

Weakness: An inadequacy found during an appraisal.

Section 1 – Introduction

Vision

The vision of the Office of Emergency Management Oversight (HS-63), within the Office of Independent Oversight (HS-60), is to stimulate qualitative improvements in U.S. Department of Energy (DOE)/National Nuclear Security Administration (NNSA) emergency management programs by providing the Secretary of Energy and other senior managers with independent, objective, accurate, timely, and credible information regarding the effectiveness of emergency management programs and by identifying potentially useful and effective program improvements.

Mission

The mission of HS-63 is to establish and execute a program of independent evaluations and assessments focused on the DOE emergency management system (EMS) and on sites, operations, and transportation activities that have significant quantities of hazardous materials. In so doing, HS-63 provides value to senior management and promotes continuous improvement by ensuring that DOE/NNSA senior management has an accurate picture of the overall effectiveness of DOE/NNSA emergency management policy and program implementation.

The results of these independent evaluations are provided to the Secretary of Energy; to senior management responsible for program policy, guidance, and implementation; and to others as may be directed. HS-63's program requirements and mandates are listed in Table 1-1.

Table 1-1. Office of Emergency Management Oversight Program Requirements and Mandates

- Conduct independent oversight of DOE/NNSA emergency management policies, procedures, standards, and guidelines, and oversee the adequacy of their implementation throughout the complex.
- Communicate the status of emergency management policies, programs, and implementation to DOE/NNSA managers in various written products (e.g., appraisal reports, special study reports, follow-up review reports, and input for annual reports).
- Maintain awareness of the status of findings and associated corrective actions identified during appraisals.
- Maintain a program for corrective action follow-up consistent with the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 98-1 and DOE Order 470.2(x).

Organization

The emergency management oversight program is managed by the HS-63 Director, who is responsible for program management, execution, and administration, and human resource activities for assigned staff. HS-63 is part of the broader activity under the Chief Health, Safety and Security Officer, who reports directly to the Secretary of Energy. This reporting framework provides programmatic independence from DOE/NNSA elements that have line and/or program management responsibilities for emergency management programs and policy.

About This Guide

This *Emergency Management Oversight Appraisal Process Guide* is a companion publication to the *Independent Oversight Appraisal Process Protocols*, which provides general guidance common to all Independent Oversight appraisal activities. This HS-63 guide provides additional detail and guidance specific to emergency management oversight appraisals conducted by HS-63. HS-63 evaluation team members should maintain familiarity with both documents. To minimize unnecessary redundancy between the two guides, this document sometimes refers to sections in the *Independent Oversight Appraisal Process Protocols*.

Scope of Emergency Management Oversight Appraisals

HS-63 activities are designed to satisfy its mission requirements. Its oversight function is “independent” from the Department’s line program offices (line management) in that the office has no responsibility for operations or programs, policy development, or technical support to line managers, and does not receive guidance or direction from line managers below the Secretarial level.

The emergency management oversight program includes a number of activities, collectively referred to as appraisals, related to evaluating DOE/NNSA policy and contractor line management performance in the areas under its purview. HS-63 conducts the following types of appraisals:

- **Inspections** are conducted by HS-63 to assess the adequacy of DOE policies and the effectiveness of policy implementation by Headquarters and line organizations. HS-63 inspections are scheduled activities that may include, but are not limited to, the following key elements of emergency management:
 - Hazards surveys and emergency planning hazards assessments
 - Emergency response organization (ERO)
 - Offsite response interfaces
 - Categorization and classification of operational emergencies
 - Notifications and communications
 - Consequence assessment
 - Protective actions and reentry
 - Emergency medical support
 - Emergency public information
 - Emergency facilities and equipment
 - Termination and recovery
 - Program administration, including emergency plans

- Performance assurance activities and emergency readiness assurance plans, including feedback and improvement
- Training and drills
- Development and conduct of exercises.
- **Emergency exercise evaluations** are conducted by HS-63 to determine how effectively the DOE/NNSA and contractor EROs have prepared for and can respond to a simulated hazardous materials accident. Exercise evaluations assess the response and recovery actions of sites/facilities and DOE/NNSA emergency operations centers; interfaces with Federal, state, and local agencies and Departmental entities (e.g., field/operations office or program office); and the Department's emergency response assets.
- **Follow-up reviews** are conducted to determine the status and progress of corrective actions and other activities being taken in response to deficiencies previously identified during HS-63 appraisals.
- **Special studies** are performed as required to address an area, concern, or issue within the emergency management program. They may focus on the status of a specific program element, the adequacy of specific policies, or the implementation status of specific policies throughout DOE/NNSA. They may also address areas outside emergency management that affect the program.
- **Special reviews** are conducted at the request of the Secretary or other senior DOE/NNSA managers, sometimes on a "rapid response" basis, to provide specific needed information about emergency management or other critical Departmental functions. HS-63 is not routinely called upon to perform special reviews; however, the Office provides personnel and other resources when necessary.
- **Program status reviews** are performed to determine the condition of one or more program elements or attributes for the purpose of providing feedback to the site regarding areas within the emergency management program that may merit further attention.

Except for program status reviews, a validated report is published for each appraisal, findings are identified, and program performance is normally rated according to the Independent Oversight rating system described in Section 5 of this guide. When appropriate, needed improvements are identified. Proposed corrective actions are reviewed for adequacy, and findings and associated corrective actions are tracked for subsequent follow-up.

For program status reviews, the results may be communicated more informally through such means as trip reports.

Subordinate Procedures

This Appraisal Process Guide describes HS-63's general process and principal activities for evaluating the effectiveness of emergency management policies and DOE/NNSA line management in implementing those policies, throughout the Department. HS-63 has developed an internal training document and an

inspectors guide to provide further guidance for conducting emergency management program reviews and emergency management limited-scope performance tests, respectively.

The *Emergency Management Program Inspectors Guide* provides a set of detailed tools and references that inspectors can use to plan, conduct, and close out an inspection of the emergency management program. These tools serve to promote consistency, assure thoroughness, and enhance the quality of the inspection process.

The *Emergency Management Limited Scope Performance Test Inspectors Guide* describes the performance tests that HS-63 uses to assess the effectiveness of selected emergency response personnel and emergency response functional organizations in responding to postulated events. This guide provides the methodology that the evaluator uses to develop and conduct an emergency scenario to test the proficiency of responders and the adequacy of response procedures and job aids in selected emergency response elements, such as formulation of protective actions. Scenario development, use of trusted agents, briefings to the individual being evaluated, and guidelines for conduct are discussed. Topics also include the extent of simulation and confidentiality considerations.

Section 2 – Emergency Management Appraisals

Introduction

The emergency management oversight program provides a disciplined and consistent process for monitoring, evaluating, and reporting the status of emergency management programs in the Department. The process has been developed and refined over time and tested through repeated use. The remainder of this guide describes the essential elements of that process, all of which are closely tied to established emergency management oversight appraisal goals.

Appraisal Goals

Emergency management oversight program goals are to:

- Determine whether DOE/NNSA policies and policy guidance for emergency management are effective.
- Determine whether emergency management programs meet the requirements established by DOE/NNSA policy and whether the programs are effective.
- Assess the impact of any identified deficiencies, taking into account mitigating factors, compensatory measures, and current or planned corrective actions.
- Determine the status of actions relative to previously identified deficiencies.
- Present potential enhancements for consideration for strengthening the program or addressing identified deficiencies.

Appraisal Philosophy

The oversight philosophy that guides HS-60 office-wide appraisal efforts is stated in Section 2 of the *Independent Oversight Appraisal Process Protocols*. HS-63 applies that philosophy to the emergency management oversight appraisal process.

Roles and Responsibilities

Responsibilities for implementing the emergency management oversight program reside within HS-60 and HS-63, as indicated below.

Office of Independent Oversight (HS-60)

The Office Director and staff provide strategic direction, quality management, coordination, and information management for the overall independent oversight program, including the emergency management oversight program.

The Office of Emergency Management Oversight (HS-63)

The Office of Emergency Management Oversight is responsible for performing the following activities in support of its primary mission of conducting appraisals of DOE/NNSA emergency management programs:

- Performing periodic appraisals of emergency management programs at DOE/NNSA sites having significant amounts of hazardous materials
- Performing periodic appraisals of the DOE/NNSA Headquarters EMS
- Evaluating DOE/NNSA policies related to emergency management
- Performing follow-up reviews to ensure that corrective actions are effective
- Performing complex-wide studies of emergency management issues
- Developing recommendations and identifying opportunities for improving emergency management performance
- Providing feedback to the Office of Emergency Operations regarding the results of its evaluations
- Communicating with and responding to state and local stakeholders
- Apprising the Defense Nuclear Facilities Safety Board (DNFSB) of HS-63 activities and issues, as directed
- Providing resources, as necessary, to participate in special reviews.

In support of these activities, the Director and Deputy Director of the Office of Emergency Management Oversight have the following responsibilities.

Director, Office of Emergency Management Oversight

- Oversees implementation of the Independent Oversight emergency management appraisal program
- Provides overall direction and guidance
- Establishes appraisal schedules
- Interfaces with Headquarters and field personnel to coordinate activities and address concerns
- Serves as Inspection Team Leader for combined inspections with other Independent Oversight offices when designated by the HS-60 Director
- Makes emergency management appraisal team assignments and establishes review scope
- Participates on the Quality Review Board

- Briefs senior DOE management and other stakeholders on appraisal results.

Deputy Director, Office of Emergency Management Oversight

- Provides direction and guidance consistent with the HS-63 Director
- Recommends appraisal schedules
- Serves as Inspection Team Leader for combined Independent Oversight office inspections when designated by the HS-60 Director
- Supports the HS-63 Director in interfacing with Headquarters and field personnel to coordinate activities and address concerns
- Recommends appraisal team structure and scope
- Participates on the Quality Review Board, as requested
- Briefs senior DOE/NNSA management and other stakeholders on appraisal results

Typical roles and responsibilities for HS-63 appraisals are listed below.

Team Leader

The Team Leader is responsible for leading and managing the overall team effort, including the efforts of other Independent Oversight offices as well as the emergency management appraisal team, in their conduct of the evaluation activities, analysis of observations and results, and rating of the program elements. He/she ensures that the scope of the appraisal is accomplished and that the results are reported accurately and in a timely manner. The Team Leader keeps HS-60 management, as well as site senior management, informed of the team's progress throughout the evaluation. Specifically, the Team Leader:

- Leads appraisals that include an emergency management component
- Provides input on the recommended appraisal scope
- Provides direction and guidance to team members on the approach to specific appraisal activities
- Develops the inspection plan with support from Topic Leads as applicable
- Provides feedback on the proposed appraisal team structure and makes recommendations for additional resources needed to accomplish the scope
- Makes arrangements with the site for document requests and other logistics, as needed
- Establishes the schedule of events for appraisals and makes specific assignments
- Ensures that team members perform their assigned duties
- Addresses site concerns associated with appraisal activities

- Provides feedback to site personnel on a daily basis to validate assessment information, and clearly communicates areas of concern
- Prepares and presents appraisal reports
- Briefs site management and counterparts on appraisal results.

Topic Team Leader

During some inspections, HS-63 may be part of a joint inspection team with HS-61, HS-62 (cyber security), or HS-64 (environment, safety, and health). Joint inspection teams have both an overall Team Leader and a Topic Team Leader for emergency management. The Topic Team Leader supports the Team Leader, as necessary, during the appraisal. The Topic Team Leader is responsible for leading and managing the emergency management appraisal team's efforts in their conduct of evaluation activities, analysis of observations and results, and rating of the program elements. The Topic Team Leader ensures that the scope of the appraisal is accomplished and that the results are reported accurately and in a timely manner. The Topic Team Leader keeps the Team Leader and the HS-63 Director, as well as site management, informed of the team's progress throughout the evaluation. Specifically, the Topic Team Leader:

- Supports the Team Leader in leading appraisals for emergency management
- Provides input on the recommended appraisal scope
- Provides direction and guidance to team members on the approach used to conduct performance testing and other inspection activities
- Provides input to the Team Leader on document requests and other necessary logistics to support the topic team
- Provides feedback on the proposed emergency management appraisal team structure and makes recommendations for additional resources needed to accomplish the scope
- Assures that assignments and schedules are conducive to implementing the plan
- Ensures that topic team members perform their assigned duties
- Addresses site concerns associated with activities
- Provides feedback to site personnel on a daily basis to validate assessment information, and clearly communicates areas of concern
- Prepares and presents the emergency management sections of appraisal reports
- Participates in briefing site management and counterparts on appraisal results.

When HS-63 performs reviews without other Independent Oversight offices, the Team Leader and Topic Team Leader are the same.

Team Members

Each team member evaluates the effectiveness of policies and implementation of assigned emergency management program elements. They are responsible for focusing individual data collection activities, developing lines of inquiry, conducting performance tests and daily validations, briefing the team leaders, and writing assigned appraisal report sections. Specifically, team members:

- Support the Team Leader and Topic Team Leader in conducting assigned appraisals
- Provide input to the Team Leader and Topic Team Leader on appraisal scope and potential approaches
- Conduct appraisal activities following the direction and guidance of the Team Leader and Topic Team Leader
- Prepare the schedule of interviews to accomplish during the onsite visit
- Review key site documents prior to the onsite visit
- Conduct thorough and fair appraisals
- Prepare daily reports of inspection activities
- Validate assessment data and conclusions with site personnel on a daily basis to ensure factual accuracy
- Provide written input for draft appraisal reports as directed by the Team Leader and Topic Team Leader
- Participate in site validation meetings with counterparts and site management, as directed.

Professional Conduct and Relations with Site and Headquarters Personnel

The guidelines for professional conduct and relations with site and Headquarters personnel are stated in Section 2 of the *Independent Oversight Appraisal Process Protocols*. HS-63 fully subscribes to those guidelines and applies them to the emergency management oversight appraisal process. Guidelines for team member conduct are provided in Appendix A of the *Independent Oversight Appraisal Process Protocols*.

Major Phases of Appraisals

HS-63 appraisal activities may be characterized by the four functional phases into which they are organized: planning, conduct, closure, and follow-up.

The **planning** phase includes those activities necessary to prepare for all aspects of an appraisal. The **conduct** phase includes that portion of the appraisal principally devoted to collecting and validating data.

The **closure** phase involves data integration and analysis, issue identification, development of findings, determination of ratings (if applicable), draft report preparation and quality review, and management briefings. The **follow-up** phase includes site review, comment resolution, and final report preparation.

For some activities, the follow-up phase also includes Headquarters briefings, corrective action plan reviews, and corrective action tracking.

Although these phases are identified by the primary activities they encompass, the actual activities in each phase may overlap significantly. For example, some data is collected during the planning phase, and planning (particularly for emergency exercise evaluations and/or limited-scope performance tests) can extend into the conduct phase. Similarly, analysis begins during data collection and continues throughout the process. Subsequent sections of this guide describe the activities and expectations associated with these major appraisal phases.

Classified Information

HS-63 team personnel are not often expected to handle classified documents or sensitive unclassified information during the course of appraisals. When necessary, the Team Leader arranges for appropriate site-specific guidance and instructions to the team on these matters. For example, the Team Leader may ask that the site's classification officer provide a briefing on topic areas that may contain classified matter. In addition, team members may need to discuss proposed report section outlines with the site's classification officer before writing the report in order to identify any potentially classified areas. See Section 7, Records Management, concerning handling of classified material following the inspection.

Identification of Requirements and Guidance

DOE Order 470.2(x), *Independent Oversight and Performance Assurance Program*, establishes the overall process supporting the emergency management oversight program and includes the requirements and responsibilities for conducting, reporting, and responding to Independent Oversight appraisals.

DOE Order 151.1(x), *Comprehensive Emergency Management System*, describes the Department's EMS. This order establishes policy; assigns roles and responsibilities; and provides the framework for the development, coordination, control, and direction of the DOE/NNSA EMS commensurate with the hazards at sites and activities. The order also establishes requirements for emergency planning, preparedness, response, recovery, and readiness assurance activities and describes the approach for effectively integrating these activities into a comprehensive, "all-emergency" concept. DOE/NNSA facilities/sites or activities, operations/field offices, and DOE/NNSA Headquarters offices (except the Naval Nuclear Propulsion Program and the Power Marketing Administrations) are required to develop emergency management programs as elements of an integrated and comprehensive system. Together, these elements ensure that the DOE/NNSA EMS is prepared to respond promptly, efficiently, and effectively to any emergency involving DOE/NNSA facilities/sites, activities, or operations, in order to protect workers, the public, the environment, and national security.

The *Emergency Management Guide* (DOE Guide 151.1-1) provides non-mandatory guidance for implementing the requirements pertaining to the DOE/NNSA comprehensive EMS. This guide applies to all DOE/NNSA facilities/sites, activities, and operations and to all organizational levels (facility/site, operations/field office, and Headquarters offices) except the Naval Nuclear Propulsion Program and the Power Marketing Administrations. Emphasis is placed on guidance for the Operational Emergency programs at facilities/sites. If the site does not use the methodologies contained in the *Emergency Management Guide*, the site's alternate approach needs to provide an equivalent level of protection for site workers, the public, the environment, and national security.

In addition to the order and guides specific to emergency management, additional requirements can be found in directives related to other programs, such as:

- DOE Order 225.1(x), *Accident Investigations*
- DOE Guide 231.1-1(x), *Occurrence Reporting and Performance Analysis Guide*
- DOE Order 414.1(x), *Quality Assurance*
- DOE Order 420.1(x), *Facility Safety*
- DOE Order 435.1(x), *Radioactive Waste Management*
- DOE Guide 440.1-1(x), *Worker Protection Program for DOE (including the National Nuclear Security Administration) Federal Employees Guide for Use with DOE O 440.1B*
- DOE Order 450.1(x), *Environmental Protection Program*
- DOE Guide 450.4-1(x), *Integrated Safety Management System Guide*
- DOE Order 452.2(x), *Nuclear Explosive Safety*
- DOE Order 452.4(x), *Security and Control of Nuclear Explosives and Nuclear Weapons*
- DOE Order 460.1(x), *Packaging and Transportation Safety*
- DOE Order 153.1(x), *Departmental Radiological Emergency Response Assets*

Section 3 – Appraisal Process Planning

Introduction

Planning within HS-63 is a long-range and continuous process, involving a myriad of activities and essentially all staff members. This guide deals only with those aspects of planning that are most directly associated with conducting appraisals. Thorough planning is the foundation of all appraisals. Even routine and repetitive appraisals require the gathering and analysis of large amounts of information from many sources, decision-making based on that analysis, and appraisal preparations based on those decisions. The quality of planning significantly affects all other appraisal phases. Because there are limited amounts of time and other resources available for planning, planning efforts must be focused and efficient.

The same planning process is applicable regardless of the type of review (e.g., appraisal, inspection, study, or other), the size of the team involved, or whether the appraisal is office-specific or a combined inspection involving multiple Independent Oversight offices. The planning requirements may vary in magnitude for different activities, but the essential elements of planning do not.

This section outlines the HS-63 planning process for appraisals and the general distribution of planning responsibilities. Table 3-1 summarizes the major planning events.

Table 3-1. Major Planning Events

Planning

- Review facility information
- Identify potential problem areas and inspection focus areas
- Develop and submit document request lists
- Coordinate logistics requirements
- Identify proposed appraisal team members
- Identify points of contact

Scoping Visit

- See Table 3-2 for Scoping Visit Events

Planning Meeting

- Brief team on the results of site visit(s)
- Review and analyze documents
- Refine topic focus
- Integrate planning efforts
- Conduct discussions with representatives of the site/operations office and the facility
- Coordinate and develop performance tests and safety plans with the trusted agent
- Select samples of documents, interviewees, and performance tests
- Brief HS-60 management

Conducting the Inspection

- Revise plans, as necessary

Planning Goal

The goal of planning in HS-63 is to anticipate and successfully prepare for every action necessary to meet mission requirements and conduct the highest quality appraisals possible with the available resources.

Strategic Planning, Program Planning, and Scheduling

Strategic planning is the responsibility of the HS-60 Director and the HS-63 Director. Strategic planning involves taking a long-range view of evolving emergency management issues and adjusting the organization's processes and capabilities to meet future needs. It is recognized that priorities may change as a result of world or national events, DNFSB focus issues, or mission changes within DOE/NNSA. HS-63 plans and schedules will be revised accordingly, and as directed.

Management Planning

Management planning responsibilities are continuous throughout an appraisal's cycle. Most of the early planning requirements are management responsibilities (as opposed to team planning responsibilities.) After an appraisal has been approved and tentatively scheduled, the Team Leader, in conjunction with the HS-63 Director, is responsible for planning activities, which may include:

- Contacting the affected sites and organizations to begin ongoing coordination
- Identifying and collecting documents and other information that will be needed for more detailed planning
- Conducting an initial review of available information to facilitate initial decisions regarding activity scope and focus
- Determining the tentative scope and focus of the appraisal
- Developing and coordinating a site visit schedule with the site(s)/organizations(s) to be visited
- Identifying and acquiring the personnel resources needed to adequately support both the technical and administrative aspects of the appraisal
- Identifying and satisfying logistics needs, such as onsite workspace, hotel accommodations, computer and other equipment support, and visit requests/badging
- Directing and overseeing team planning activities at team planning meeting(s) or site planning visit(s)
- Overseeing necessary ongoing planning throughout the course of the appraisal.

The HS-63 checklist for appraisal planning is an internal tool that the Team Leader may use to assist in the appraisal planning process. Management planning activities, with appropriate input from the results of early team planning activities, culminate in a formal plan for the conduct of the appraisal. Because planning is continuous throughout an appraisal, the formal plan is a "living document," subject to modification as the activity progresses.

Site Notification of Scoping Visit and Data Collection Visit

For planned emergency management appraisals, Independent Oversight management typically arranges dates and schedules for the onsite visits with the appropriate secretarial officer (SO) and operations or field office. As part of the Independent Oversight inspection scheduling process, HS-60 (through the Chief Health, Safety and Security Officer) sends a formal notification to DOE/NNSA line management (i.e., the SO or NNSA Deputy Administrator and the cognizant line manager) of the schedule of the site visits associated with the inspection.

Scoping Visit

Not all appraisals require a scoping visit. If conducted, the site scoping visit helps focus the evaluation early in the planning process. Evaluation team management and selected technical specialists (for HS-63, usually the team member(s) responsible for planning and conducting limited-scope performance tests) conduct the scoping visit several weeks before the onsite planning visit. The purposes of the scoping visit are summarized in Table 3-2.

Table 3-2. Purposes of the Scoping Visit

- Understand the DOE/NNSA and contractor organizational structure and approach to management
- Obtain site documents and develop a follow-up document request list (as necessary)
- Tour facilities associated with limited-scope performance tests
- Confirm overall scope and focus areas for the evaluation
- Identify the potential need for reviews by an authorized classifier
- Identify and obtain information from stakeholders
- Identify DOE/NNSA and contractor points of contact or counterparts (site and Headquarters)
- Convey the purpose, preliminary scope, and approach for the evaluation
- Coordinate logistical arrangements

The scoping visit typically lasts two to three days. Before the visit, the Team Leader, in coordination with the site, prepares a schedule of activities for the scoping visit. During the HS-63 preparation and planning phase of the evaluation, a scoping visit may also be scheduled with the Headquarters SO. Depending on the complexity of the limited-scope performance tests and other schedule considerations, evaluators may coordinate with the site trusted agent(s) during the scoping visit to conduct detailed planning for the performance tests. Otherwise, the Team Leader and the lead performance test evaluator conduct performance test planning during a separate onsite planning visit approximately two weeks before the official data collection visit.

Team Structure

The HS-63 Director assigns the inspection Team Leader; for combined inspections, the HS-63 Director assigns a Topic Team Leader. The emergency management oversight team structure greatly depends on the size and complexity of the appraisal. Elements common to most appraisal teams are discussed below.

The Team Leader (a senior manager or senior professional of HS-63) assembles a team with the requisite experience to conduct the appraisal. The team members from HS-63 and any independent consultants hired to assist in the appraisal are professionals who possess technical and appraisal expertise in their assigned field.

The typical team organization is designed to promote a single, integrated team effort. All team members and coordinators work together to pass along information and issues of mutual interest. This team organization is intended to facilitate the management of the team and the rollup of information, not to limit or impede access to the Team Leader or other team members by individual evaluators. Team members are encouraged to keep each other informed of important issues or common lines of inquiry. For example, an evaluator may find a problem in the classification of Operational Emergencies that is caused by inadequate training. This information should be passed on to other team members who are evaluating different key emergency management elements. Doing so may expose a larger, more pervasive problem in emergency management training programs. Team members should not assume that they are to function only within their key element or technical area. Rather, they should work together across disciplines and areas of expertise to share information, request assistance, and follow up on lines of inquiry. The appraisal and the resulting report are a compilation of the team's efforts, not of any single individual.

The Team Leader manages the planning efforts, assigns evaluation tasks, and coordinates the data collection activities of the appraisal team. The Team Leader is responsible for the rollup of issues and programmatic weaknesses developed by the team members for use in the preparation of assigned sections of the evaluation report.

The appraisal team is supported by an administrative support coordinator who oversees the administrative and logistical support required by the team and serves as the point of contact for onsite support.

Team Selection

Appropriate team members must be selected to evaluate the key emergency management program elements selected for review. The final team composition cannot be set until the areas to be evaluated are determined during the planning effort. However, the Team Leader, Topic Team Leader (if applicable), and administrative support coordinator are selected at the start of planning, when the tentative scope has been determined. Also, certain management and technical specialists may be assigned to the team from the outset based on the known mission and major facilities at the site to be evaluated. This initial group works together during planning to identify not only the scope of the evaluation, but also the personnel to conduct evaluations in the areas within the scope.

As planning for the appraisal progresses, the HS-63 Team Leader refines the scope and focus of the appraisal and may also amend the team roster to reflect these changes. Team members may be asked to accept additional assignments, new team members may be added to address particular technical areas, and team members may be dropped as the planning process progresses. The HS-63 Director and Team Leader structure the team as they see fit to meet the needs of the appraisal activity.

Appraisal Plan

An appraisal plan is developed after the tentative scope of the appraisal has been determined; this typically occurs before the scoping visit. The goal is to provide the appraisal plan to the site approximately one month in advance of the onsite planning portion of the evaluation. Appraisal team management develops the appraisal plan, which reflects the evaluation objectives and focus areas. The appraisal plan is approved by the HS-63 Director (and other HS-60 office directors, as necessary, for combined inspections) and is transmitted by cover memo from the HS-60 Director's office to the site contractor and DOE/NNSA site office/operations office (as applicable), program office, and the Office of Emergency Operations. Team

members then use the plan to develop more detailed data collection plans containing specific lines of inquiry and data collection techniques. A typical outline for an evaluation plan is shown in Table 3-3.

Table 3-3. Typical Appraisal Plan Contents

<ul style="list-style-type: none">• Introduction• Schedule• Team Responsibilities and Assignments• Inspection Process• Scope of the Inspection• Inspection Criteria and Activities

The appraisal plan is considered to be a “living document” and is modified as necessary during the course of the inspection if significant changes in scope are identified.

Team Planning

Team planning refers to planning efforts that begin once the evaluation team is selected and assembled and the first team planning meeting is held. Team planning activities concentrate on determining appropriate data collection techniques; completing detailed data collection plans that lay out the framework for data collection and analysis during the evaluation; and focusing and redirecting evaluation activities based on continuing analysis of information.

Planning occurs at several different levels within the team, including team management planning, team planning for the management and technical specialists in their focus areas, and individual planning. Although planning within the team concentrates on different activities, it is still imperative that team members coordinate activities with each other to address selected facilities, maintain focus, and promote efficient use of team resources.

The team planning meeting, which may occur at Headquarters or may be conducted electronically or telephonically, depending upon the nature and needs of the specific appraisal, is the first meeting involving the entire team. It serves to kick off team planning and to orient the team on the appraisal process. This meeting is typically conducted within three weeks prior to the site data collection visit. It is important to bring the team together early and get individuals working in a team environment. The purposes of the team planning meeting are summarized in Table 3-4. During this period, team members review available site documents to better focus their data collection plans, allowing them to use the limited time available more efficiently while on site.

Table 3-4. Purposes of the Team Planning Meeting

- Brief team members on the results of previous management planning activities, including the objectives and proposed parameters of the appraisal and any management guidance and expectations.
- Review and analyze available documentation.
- Discuss key facilities at the site.
- Schedule or plan preliminary interviews with DOE/NNSA field element and facility managers, the program office, and the Office of Emergency Operations.
- Identify stakeholders.
- Coordinate appropriate information exchanges with representatives from Headquarters and the field.
- Recommend any modifications to activity scope and focus resulting from planning activities.
- Determine appropriate data collection methods and develop detailed data collection plans, including any necessary performance test plans, safety plans, etc.
- Develop a schedule of data collection and related activities.
- Identify additional information and support requirements and communicate them to the appropriate individuals or organizations.
- Brief or otherwise inform managers of planned activities.
- Coordinate logistics and travel plans.

Much of the detailed planning for an appraisal is accomplished at the planning meeting(s). However, planning is an ongoing effort and may continue well into the conduct phase of the activity. Both managers and team members are expected to remain flexible and ready to modify plans in response to unexpected circumstances that may arise during any phase of an appraisal.

Planning for Management and Technical Specialist Activities

Management and technical specialists are tasked with measuring the effectiveness of the emergency management programs by evaluating facilities, programs, and technical functional and focus areas. As discussed in Section 4, observations and walkdowns at primary facilities, as well as performance observations (including previously scheduled training and drills), are extremely valuable methods of gathering data.

To maximize use of these methods, team members need to plan their data-gathering activities so that observations can be dovetailed with more-easily scheduled data collection activities, such as document reviews of programs and procedures, as well as interviews with facility-level DOE/NNSA and contractor management and workers. The result of team member planning is a preliminary schedule of onsite data collection activities, an individual evaluation plan, and identification of additional documents for onsite review.

Headquarters Interviews

The data collection process begins at Headquarters during the team planning phase before shifting to the site. During team planning, team members should conduct preliminary interviews with responsible Headquarters management and staff, retrieve Headquarters documents, and conduct other data collection activities.

Team Communications

Effective, frequent communication is one of the most important keys for a successful evaluation. This includes communication among team members and between the team, Independent Oversight management, line management, and external stakeholders. The team's communications with external stakeholders are extremely important to the evaluation, because the stakeholders are involved during various phases of the review. The Team Leader works with the HS-63 Director and the HS-60 Director to develop an outreach strategy appropriate to meeting the appraisal objectives for the site. The strategy might include contacting citizen advisory boards or regulating agencies in communities in the vicinity of the site to explain the team's mission and the objectives of the appraisal, and to obtain any community input that will assist in the appraisal of the emergency management program. The strategy may also include distributing the final report to external stakeholders.

Several different types of meetings and briefings are necessary to maintain team communications during the evaluation. Effective communications within the team cannot be limited to formal meetings or written internal status reports. Team members must exchange information as needed to produce a consistent, integrated evaluation. Typical forums for such communication are ad hoc, face-to-face meetings; telephone conversations; and even conversations over lunch or in the car while riding to and from the site. As noted earlier, team members must be aware that their activities involve sensitive information, and any sensitive communications should be conducted only in appropriate surroundings.

Summary

Planning occurs throughout the appraisal process and results in the products shown in Table 3-5. Efficient and thorough planning activities result in the team having the necessary plans and resources to accomplish an accurate evaluation of line management's implementation of the emergency management program.

Table 3-5. Products of Planning

- Identification of focus areas
- Document request lists
- Team roster and structure
- Inspection plan
- Individual data collection plans
- Individual schedules for onsite activities

Section 4 – Conducting Appraisals

Introduction

The conduct phase of an appraisal normally encompasses the period when most of the needed data is collected. It may consist of a concentrated effort during a relatively short period of time, as during an exercise evaluation, or it may occur over an extended period, as in some special studies. For some types of appraisals, team members may not be located at the subject site. The conduct phase is tailored to the unique needs and objectives of each specific appraisal. This stage is crucial to the success of an appraisal because it is during this stage that team members collect most of the information upon which they will base their analyses, conclusions, ratings, and recommendations, when appropriate.

Goal

The goal of conducting an appraisal is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

Scope

Data collection activities generally follow the plans and schedules developed during the formal planning process. Team members normally focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, early data collection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Problems or potential problems that become apparent during the course of data collection should not be ignored simply because they were not included in formal planning.

Data Collection Methods

Since data is critical to a successful appraisal, it is essential to collect sufficient amounts of accurate, pertinent data, which requires appropriate data collection methods. There are four basic methods of data collection available to team members: document reviews, interviews, observations, and performance tests. Since each of these methods has inherent strengths and limitations, the specific methods employed must be carefully selected and used in combination with each other to ensure that all necessary data is collected and cross-checked.

Document Reviews

Line management usually relies on detailed documentation, such as policies, plans, and procedures, as well as self-assessment activities, to ensure that programs are properly implemented and administered. Document reviews can provide the team with information about the consistency of written policies and procedures with DOE/NNSA requirements (an indication of how the program is intended to operate) and may suggest weaknesses that need further exploration. Where possible, requests for needed documents should be made early enough so that team members can use them in planning their onsite activities. Team members should limit the initial document request to only those documents that are not available to them electronically and that are essential to their planning and preparation effort. (See Appendix A for a sample document request list.)

The team may request that certain documentation be made available prior to the site scoping visit or at the site for use when data collection begins. Document reviews often continue throughout data collection as team members request additional documents to develop a more complete understanding of programs and how they function. Requests for additional documents are directed to the appropriate point of contact or counterpart.

The documents of most interest are usually emergency program policy and planning documents on how programs are designed to function; written procedural documents; self-assessments; and other records that may indicate whether programs are implemented as required or designed.

Table 4-1 lists documents typically reviewed during the course of an HS-63 appraisal.

Table 4-1. Typical Documents Reviewed

<p>Analyses</p> <ul style="list-style-type: none">• Hazards surveys• Emergency planning hazards assessments• Consequence analyses• Documented safety analysis reports <p>Plans</p> <ul style="list-style-type: none">• Emergency plans• Emergency readiness assurance plan• Emergency public information plan• Training plans• Corrective action plans• ERO rosters <p>Procedures</p> <ul style="list-style-type: none">• Emergency plan implementing procedures• Emergency response procedures for support disciplines, such as health physics• Readiness assurance procedures <p>Records</p> <ul style="list-style-type: none">• Training documentation• Drill and exercise packages• Hazardous material inventory reports• Incident and occurrence reports• Oversight and self-assessment reports• Corrective action tracking reports <p>Other</p> <ul style="list-style-type: none">• Memoranda of agreement• Mutual aid agreements• DNFSB reports• Program secretarial office field assessments• DOE/NNSA operations office and/or site office assessments• Office of Emergency Operations site assistance visit reports and “no notice” exercise reports• Corrective Action Tracking System database reports• Organization charts
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Interviews

Interviews can provide useful data that is not readily available from other data collection methods. Interviews are most effective in determining perceptions and individual understanding of policies, procedures, duties, and management expectations. Both formal and informal interview techniques may be employed; in either case, deliberate preparation is necessary. Table 4-2 lists protocols to assist in the conduct of interviews.

Individual interview schedules should be coordinated with other team members to minimize impact on site personnel, and team members should inform the Team Leader of interviews with senior managers so that he/she can participate.

Table 4-2. Interview Protocols

- Prepare questions and lines of inquiry in advance.
- Ensure prompt attendance at scheduled interviews.
- Be sensitive to other demands on the interviewee's time. Place a reasonable limit on the duration of the interview. If necessary, schedule additional interview sessions to complete the areas of inquiry.
- Do not "lead" interviewees in answers and conclusions.
- Typically, conduct interviews in the interviewees' work location to promote easy access to applicable documents.
- Interview attendance:
 - Limit attendance to one or two interviewers.
 - Limit attendance by line personnel to the interviewee unless the interviewee requests the attendance of a manager or union representative.
 - Ask attendees not to respond to questions asked of the interviewee but to provide only advice and support to the interviewee.
 - To ensure an open and candid interview and exchange of information, requests from individuals, including managers, to attend interviews are not normally entertained unless requested by the interviewee.
- Explain the purpose of the interview.
- Pace questions to allow full response and avoid a "third degree" atmosphere, particularly when multiple interviewers are involved.
- Question tactfully, listen sensitively, observe thoughtfully, and evaluate accurately.
- Take good interview notes. Do not rely on memory.
- Summarize the interview at the end to assure that interviewer conclusions and interviewee concerns are appropriately captured.

Observations

An assessment of operations by the team member is an essential data collection technique. Observing operations may be not only desirable but also necessary for an accurate evaluation in situations where these operations are critical to mounting an effective emergency response.

Observations allow team members to see how site personnel actually do their jobs and to evaluate how they perform their duties under various conditions. For example, observing personnel using dispersion modeling software provides valid data on whether site personnel follow established procedures and whether they are capable of using the equipment and software properly. Before observing someone

executing a procedure, the team member should thoroughly review and understand the procedure to establish a baseline for the observation.

HS-63 uses emergency response exercise evaluations to identify both strengths and deficiencies in the response of the emergency management program elements to a simulated emergency event. Emergency exercise evaluations are typically designed by the site to validate many elements of an emergency management program. Program effectiveness is judged based on an observed and evaluated demonstration of response and recovery capabilities. During an emergency response exercise evaluation, team members observe activities involving the ERO and their utilization of facilities, equipment, and procedures, as well as the overall conduct and control of the exercise, based on exercise documentation, including the scenario and objectives.

During observations, team members must not interfere with ongoing activities or manipulate equipment or touch controls, and they must comply with all applicable radiological, security, and safety requirements. Team members should ensure that talking to or asking questions of operators, responders, or facility staff during ongoing activities does not unduly distract the individuals or disrupt their activities. Table 4-3 lists typical activities that may be observed in connection with an HS-63 appraisal.

Table 4-3. Typical Performance Observations

- Annual facility/site exercises
- Training sessions
- Emergency equipment condition
- Limited-scope performance tests
- Facility walkthroughs
- Drills
- Surveying, sampling, and sample analysis
- Responder briefings
- Control of exercises
- Exercise critiques

Performance Tests

Performance testing is one of the most valuable data collection methods available to HS-63 appraisal team members and is a preferred method for inspection-related activities. Performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether systems and equipment are functional and appropriate. Virtually any skill, duty, procedure, system, or item of equipment can be performance tested. Performance tests may vary in complexity from simple to complicated. The *Emergency Management Limited Scope Performance Test Inspectors Guide* developed by HS-63 provides detailed information and tools to assist inspectors assigned to evaluate the capabilities and performance of emergency management programs in DOE/NNSA. Before HS-63 conducts any performance test, all test activities must be appropriately coordinated with site representatives or other responsible individuals or organizations.

Limited-scope performance tests are used to assess the performance of selected emergency response personnel and/or functions, typically incident commanders and other initial decision-making personnel, in responding to a postulated event that requires an immediate site response. These tests are particularly useful when ERO readiness needs to be evaluated, but the assessment visit does not coincide with a

scheduled site exercise or drill. The assigned evaluator and site trusted agents collaborate to develop one or more emergency scenarios that are designed to test the proficiency of the responders in selected emergency response elements, such as event categorization and classification. The evaluator uses a site-designated trusted agent as a subject matter expert on site protocols, plans, procedures, and terminology to validate the scenario and the appropriate response. To begin the performance test, the players are briefed on its purpose, and guidelines for its conduct are discussed using a standardized list of topics, such as extent of simulation and confidentiality considerations. The players are then provided the initial conditions and assumptions, as well as all information and response tools they would normally have available under the stated circumstances. Upon scenario initiation, the evaluator observes the responders' actions and notes the documents used to support those actions. Performance tests may be administered to a sample of the qualified responders using the same or a similar scenario, to ensure that any conclusions regarding responder readiness and proficiency are valid.

ERO functional groups, such as the consequence assessment team, may also be evaluated utilizing the limited-scope performance test methodology to assess the team's effectiveness in responding to postulated events.

Other Methods

HS-63 personnel are not limited to using the four basic data collection methods as described above. Different or hybrid methods may be used, and personnel are encouraged to employ the best techniques available for a specific task.

Communications and Integration

Since various team members collect data during virtually all appraisals, it is important that all appropriate information is shared among team members in a timely manner. Information collected by one team member may have a direct impact on a line of investigation being conducted by another. When teams are relatively large (as in the case of an exercise evaluation or a combined inspection) and each is focusing on a different area or discipline, a conscious and deliberate effort at information integration is required. Specific methods for achieving integration may be formal or informal, may be dictated somewhat by the team size and type of activity involved, and may include team meetings, shared data collection notes, and daily reports to managers. A daily report summarizing the progress of the appraisal and significant emerging emergency management issues is typically provided by the Team Leader to the HS-63 Director, who may forward it to the HS-60 Director, as appropriate.

Daily reports are used for sharing information among team members and for documenting the course of an appraisal at interim steps. The primary goal of these reports is to assist in the integration of information gathered by individual team members. However, daily reports also provide additional documentation of the process by which appraisal findings are derived and serve as an archival system to provide a historical account of pertinent appraisal activities by Independent Oversight. Refer to Section 7, Records Management, for more information. Other specific methods employed by a team to achieve integration are left to the discretion of the Team Leader.

When potentially serious deficiencies are identified during an appraisal or inspection, the deficiency must be brought to the attention of the Team Leader, the responsible organization's managers, and Independent Oversight management as soon as possible. Safety concerns require immediate notifications. After enough data is collected to be reasonably sure that a significant deficiency exists, the

deficiency should be identified, formally communicated to the responsible site managers, and discussed in sufficient detail to ensure that it is understood.

For particularly complex issues, communication of the team's concern and understanding the site's perspective can be aided by formal documentation and transmittal using the optional Issue Form, which is part of the validation process discussed below. Use of this form is at the discretion of the Team Leader. Such deficiencies may or may not ultimately result in formal findings or policy issues, depending on the individual circumstances.

The HS-63 Director routinely updates the HS-60 Director when significant weaknesses are identified. DOE Order 470.2(x), *Independent Oversight and Performance Assurance Program*, contains additional specific requirements for notifications and response to significant deficiencies.

Validation

Validation is the process HS-63 uses to verify the accuracy of the information obtained during data collection activities. It is a critical element in the conduct of all appraisals. This section provides an overview of the process used to validate data and the draft report.

Data Validation Strategy

The validation strategy provides site personnel with multiple opportunities to verify the factual accuracy of data and information collected by team members at various stages of the actual appraisal process. In using any of the validation methods, team members must be very open about issues in order to provide those being evaluated with a chance to respond. These interactions often are of significant value to the site because they provide a means for HS-63 to share perspective gained from other sites in the complex.

Site Counterparts

Each team member is assigned one or more site points of contact or counterparts, both DOE/NNSA and/or contractor, designated by the site as a result of the scoping or onsite planning visit (see Section 3). These counterparts should be knowledgeable in the program element being evaluated by the team member. Team members and counterparts interact on a regular basis to ensure communication of observations, both positive and negative. Counterparts provide feedback to team members on the factual accuracy of information obtained; they recommend additional personnel to interview, as well as documentation to review for additional perspective on an issue. Additionally, team members informally discuss and review substantive issues with their counterparts regarding material they will draft into reports. This interaction allows for the quick resolution of areas of disagreement and identification of potential inaccuracies as soon as possible. In addition, validation of results in daily meetings or at the end of the onsite data collection visit between team members and counterparts provides further confirmation that results are valid and allows less room for misunderstanding.

On-the-Spot Validations

Site personnel and team members should also summarize key observations and concerns at the conclusion of interviews, walkthroughs, and observations of work performance to ensure a shared understanding of the facts observed by the team member. An on-the-spot validation immediately after an interview or a performance observation, for example, can help resolve any differences of opinion quickly and promote concurrence on important interview or observation points. However, observations from

limited-scope performance tests are not validated until all data for the performance tests has been analyzed.

Continual Interaction of Team Leaders and Site Managers

Team Leaders provide a daily "debrief" to site managers that includes both the positive and negative observations from the previous day's evaluation activities, as well as emerging issues. For example, the Team Leader usually meets with site senior line managers each morning to brief them on the status of the evaluation, important issues, and critical needs. The Team Leader may also call upon selected team members to attend. This daily meeting helps site management track the progress of evaluation activities and compare information provided by the site counterparts. The daily debrief allows site management to identify areas of disagreement quickly and to work with the HS-63 team to correct factual accuracy problems, and facilitates the notification of site management of issues that need management attention. At the mid- and endpoints of the onsite data collection period, these daily meetings are used to provide a preliminary rollup of team results and a description of issues that are being developed by the team.

As appropriate, a summary validation may be conducted to involve site managers early in the validation process and provide more information on one or more topics than they would otherwise get in the exit briefing. For a summary validation, the Team Leader (and one or more team members if necessary) provides a verbal presentation of key observations, findings, and conclusions to a group of counterparts and interested managers.

Team members also work together to compare the information they have collected during various stages of the appraisal process. This interaction increases the value of evidentiary information with validation by multiple sources. Team members should understand that each type of data and information has its limitations and should be used accordingly, and that the information presented for validation must be as thorough, accurate, and concise as possible. Finally, it is essential that conflicts in data and information are resolved between team members or between team members and site personnel as soon as possible.

Report Validation Strategy

Reports from the HS-63 appraisal are provided to site personnel for review of factual accuracy at key stages in appraisal report generation. Overall, the reporting process provides the site personnel and management with a number of opportunities to communicate concerns about factual accuracy to the team. The report validation process is as follows:

- Provide the initial draft appraisal report to the site.
- Conduct informal validation meetings between team members and counterparts regarding the content and conclusions of the draft report. These meetings are extremely useful for detailed discussion of the issues, correcting factual accuracy problems, and obtaining "buy-in" at the working level for the need to address the identified problems. These meetings typically are conducted approximately 24 hours after the site receives the initial draft evaluation report. As appropriate, supplemental round-table discussions can be held with site management and counterparts on their concerns about the facts or conclusions presented in the report. Headquarters program or policy office staff may also attend these discussions, especially when there are issues that Headquarters organizations are primarily responsible for addressing. Any issues related to DOE /NNSA policy should be validated with the Office of Emergency

Operations. After completion of all validation discussions, comments are incorporated into the final draft report as appropriate, and it is then provided to the site following the closeout briefing.

- If the HS-63 team is participating in a combined review with another HS-60 component office or if requested by site management, conduct a formal validation with key DOE/NNSA/contractor counterparts. The formal meeting is conducted after the HS-63 Team Leader (or, for combined inspections, the HS-63 Topic Team Leader) has resolved the site's validation comments. Headquarters line managers may also attend the formal validation. These sessions are also used to further explain issues, and they have been very effective in promoting buy-in with site management. Time permitting, comments from formal validation are incorporated into the final draft report as appropriate; otherwise, these comments can be addressed by the HS-63 Team Leader during the written comment period
- Provide the final draft report to the site and allow ten working days for their detailed review and written submittal of final comments. The site field element is encouraged to provide a consolidated set of DOE/NNSA and contractor comments on any factual inaccuracies or other concerns.

Keys to Successful Validation

Some key items for successful validation are provided in Table 4-4.

Table 4-4. Keys to Successful Validation

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| <ul style="list-style-type: none">• Adequate development of issues, findings, or conclusions, including performance examples, to ensure validity, understanding, and acceptance by line management• Communication of emerging issues, findings, and supporting examples to ensure that all information is provided and that the issue is understood and valid• Effective communication of issues and findings to counterparts and site managers by team members• Candid and frequent communications with line management (SO and operations office) and site points of contact• Opportunities for review at various stages of report generation• Sharing issues and findings with Headquarters line management or sharing policy issues with the Office of Emergency Operations |
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Section 5 – Appraisal Closure

Introduction

The closure phase of an appraisal normally takes place after data collection is essentially complete (although at times, closure activities may identify additional data needs). Data must be organized, assimilated, and analyzed in order to form conclusions and report the results. This section discusses the various tasks to be accomplished during the closure phase, including data analysis, determination of findings, assignment of ratings (if appropriate), report preparation, identification of policy issues, and others.

Goals

The main goals of this phase are to thoroughly analyze all available data, draw valid conclusions from that analysis, and based on the analysis and conclusions, prepare a report that accurately reflects the status of the program(s) being examined and provides appropriate managers the information they need.

Integration

The information integration discussed in the previous section continues to be important during the closure phase. During data analysis, all pertinent information, regardless of who collected it, should be considered in the effort to reach valid conclusions. Raw data, conclusions, and other results of analysis should be shared, as appropriate, among team members.

Analysis of Results

While analysis is an ongoing process during all phases of an appraisal, it culminates during the closure phase. Analysis involves a critical review of all data collection results, particularly any identified program strengths and weaknesses, and leads to logical, supportable conclusions regarding how well the program functions and satisfies the intent of DOE policy.

Analysis begins informally through daily team discussions about the observations and results of data collection. As data collection activities are completed, the results are incorporated into templates and worksheets to help guide the team members through a preliminary data analysis.

All team members work in concert to emphasize the need to continually identify underlying causes of flaws or deficiencies in emergency management program design, and/or implementation. Each specialist needs to know the details (who, what, when, where, how, and why) of the subject being evaluated to gain a full understanding of the supporting systems and how they function. Frequent and open communication with other team members is the key to identifying and “rolling up” information and issues to determine their impact.

Data analysis occurs throughout an evaluation, but it begins in earnest during the first onsite data collection and analysis visit. Before the team begins to write a report, the members must clearly identify the strengths, weaknesses, and mitigating conditions and must integrate the results and issues.

The analysis leads to logical and supportable conclusions about the effectiveness of the programs being evaluated and how well the status of the programs satisfies the intent of DOE/NNSA policy. Analysis

should always lead to a conclusion regarding the site's ability to both mitigate the consequences of incidents and protect site workers, the public, the environment, and national security.

If there are no deficiencies, analysis is a relatively simple matter. However, if there are any deficiencies, including negative issues, weaknesses, or standards that are not fully met, they must be analyzed both individually and collectively to determine their importance and impact at the site. The deficiencies are then weighed against strengths and mitigating factors to estimate their overall impact on the performance of line management and on the effectiveness of the emergency management program.

Factors that should be considered during analysis include:

- Whether the deficiency is isolated or systemic
- Whether program managers and other line managers knew of the deficiency, and if so, what actions were taken
- The importance or significance of the standard affected by the deficiency
- Mitigating factors, such as the effectiveness of other programs or program elements that may compensate for the deficiency
- The deficiency's actual or potential effect on mission performance or accomplishment
- The magnitude and significance of the actual or potential deficiency to the DOE, site, workers, the public, and environment, and national security.

The analysis must result in—and support—conclusions regarding how successfully the program being evaluated meets requirements.

Findings

One product of analysis in certain types of appraisals (e.g., inspections and follow-up reviews) is the identification of findings. Findings are used to indicate significant weaknesses that merit managers' priority attention. Team members are responsible for determining which inspection results are designated as findings; findings usually identify aspects of a program that do not meet the intent of DOE/NNSA policy, Federal or state laws, or other applicable requirements. Section 5 of the *Independent Oversight Appraisal Process Protocols* discusses findings in more detail.

Ratings

HS-63 assigns ratings to the supporting elements of a facility's emergency management program. The conclusions reached through analysis of inspection results lead to the assignment of ratings. The teams are responsible for assigning the ratings; however, final approval for ratings rests with the Chief Health, Safety and Security Officer with input from the HS-60 Director. HS-60 has established a quality control process to ensure that the assigned ratings are supported by the analysis and conclusions drawn by the team.

The rating process involves the critical consideration of all evaluation results, particularly the identified strengths and weaknesses. In the case of weaknesses, their importance and impact are analyzed both

individually and collectively, and balanced against any strengths and mitigating factors to determine their impact on the overall goal of protection of site workers, the public, the environment, and national security.

Independent Oversight uses three rating categories: *Effective Performance*, *Needs Improvement*, and *Significant Weakness*, which are also depicted by colors as green, yellow, and red, respectively.

An emergency management element being evaluated is rated Effective Performance if the emergency management function provides reasonable assurance that the identified program needs are met (overall performance is effective). The element being evaluated is normally rated Effective Performance if all applicable standards are met and are effectively implemented. An element is also normally rated Effective Performance if, for any applicable standards that are not met, other compensatory factors exist that provide equivalent protection to the site workers, the public, the environment, and national security, or the impact of failure to meet an applicable standard is minimal and does not significantly degrade the effectiveness of the emergency responders. Line managers are expected to consider any identified opportunities for improvement.

An emergency management element being evaluated is normally rated Needs Improvement when the element only partially meets identified program needs or provides questionable assurance that the identified program needs are met. The element being evaluated is normally rated Needs Improvement if one or more applicable standards are not met and are only partially compensated for by other measures, and the resulting weakness in the emergency management function degrades the ability of the emergency responders to protect site workers and the public. Line managers are expected to significantly increase their attention on the identified areas of weakness.

An emergency management element is normally rated Significant Weakness when the element does not provide adequate assurance that the identified programs needs are met. The element being evaluated is normally rated Significant Weakness if one or more applicable standards are not met, there are no compensating factors to reduce the impact on effectiveness, and the resulting deficiencies in the emergency management function seriously degrade the ability of the emergency responders to protect site workers and the public. Line managers are expected to apply immediate attention, focus, and resources to the deficient program areas.

Policy Issues

Periodically during appraisals, issues arise or deficiencies are observed that stem from policy weaknesses, such as lack of policy, lack of clarity in policy, ambiguous or contradictory policies, inappropriate policy, or inappropriate implementation guidance. When policy weaknesses are identified, they are documented and submitted to the Headquarters element responsible for the policy in question (typically the Office of Emergency Operations). The policy issue may be documented in the appraisal report or in a separate written policy issue paper that identifies the subject, provides necessary background information, states the problem, discusses its implications, and, if appropriate, recommends a course of action.

Report Preparation

A report is issued as the formal product of any appraisal. Reports are the only published records of specific appraisals, and are intended for dissemination to the Secretary and appropriate managers at DOE Headquarters and field elements (including, when appropriate, facility contractors). Reports for various

types of appraisals may vary in format; the most appropriate format for the specific purpose will be used. Appendix D of the *Independent Oversight Appraisal Process Protocols* provides guidance for preparing the portions of appraisal reports that are targeted at senior management. HS-63 reports are typically prepared using the format shown in Table 5-1. For all independent oversight activities, report preparation activities share a common process, which is described in Section 5 of the *Independent Oversight Appraisal Process Protocols*.

Table 5-1. Typical HS-63 Report Outline

TABLE OF CONTENTS
ACRONYMS
1.0 INTRODUCTION This section identifies and provides an overview of the organizations responsible for site missions, activities, and management. The key part of this section is the scope or the description of the focus areas of the appraisal, including the more detailed description of organizations evaluated. As appropriate to the historical performance of the site, the introduction may also include a concise summary of the background of the inspection.
2.0 RESULTS This section describes significant positive attributes and weaknesses of the site's emergency management program in meeting the objectives of DOE's comprehensive emergency management system.
3.0 CONCLUSIONS This section presents an overall perspective on the current state of the emergency management program for the site/facility.
4.0 RATINGS This section identifies the ratings assigned to each program element evaluated.
APPENDIX A: SUPPLEMENTAL INFORMATION This appendix identifies the structure and composition of the appraisal team and team management.
APPENDIX B: FINDINGS REQUIRING CORRECTIVE ACTION AND FOLLOW-UP This appendix summarizes the significant findings identified during the appraisal. Findings identified in this appendix are formally tracked in accordance with DOE Order 470.2(x), <i>Independent Oversight and Performance Assurance Program</i> .
APPENDICES C-F: PROGRAM ELEMENT DETAILS These appendices detail the results of the reviews of individual emergency management program elements. Each appendix contains an introduction and provides the current status of the emergency management program, results that detail key observations and findings (as appropriate), a conclusion, program element ratings, and opportunities for improvement.

Quality Review Board

Following development and internal quality reviews of the draft evaluation report by the HS-63 appraisal team management and technical specialists, a formal review and critique of the draft report is conducted

by the Quality Review Board (QRB), which is appointed and chaired by the Director of Independent Oversight. Membership includes at least two senior advisors and the HS-63 Director. QRB membership can be adjusted based on special needs. The QRB provides a corporate-level review of the draft report developed by the evaluation team to ensure that it accurately, fairly, and objectively reflects the results, conclusions, findings, recommendations, and ratings of the evaluation.

Briefings

The closure process for appraisals often includes a requirement to brief appropriate managers on the progress, results, and conclusions of the activity. Briefings fall into two main categories: internal and external.

Internal briefings apprise Independent Oversight managers and staff of the status of an ongoing activity, providing information necessary to keep them informed of results and issues so that they can provide necessary direction and guidance.

External briefings apprise managers outside of Independent Oversight—normally managers of organizations undergoing an appraisal—of the results and conclusions of an appraisal activity. HS-63 typically provides an exit briefing to managers of inspected organizations before departing a site. The exit briefing, normally scheduled for the morning of the last day on site, generally includes summaries of the status of each key program element inspected—including major strengths and weaknesses—and of the overall emergency management program, and the ratings assigned to each. HS-63 may also conduct additional briefings at Headquarters, as discussed in Section 6, Appraisal Follow-up.

The need for briefings associated with other (non-inspection) types of appraisals depends upon the specific nature of such activities. The structure, level of detail, and specific content of briefings is tailored to the needs of the audience and the specific information that needs to be communicated.

Process Improvement

HS-63 consistently strives to improve its internal processes as part of its continuing effort to improve its products and the value they provide to the Department. During the closure phase of each major appraisal, and typically before the team leaves the site, Team Leaders meet with the team members to identify any lessons learned in conducting the appraisal. Team members may also provide written comments to the Team Leader as to how the appraisal process could be improved. The Team Leader submits a lessons-learned report to the HS-63 Director, identifying both positive and negative aspects of the appraisal and any recommendations for improving the appraisal process. Recommended improvements should address any necessary revisions to the *Emergency Management Oversight Appraisal Process Guide*. The HS-63 Director then communicates any significant lessons learned via memo to Independent Oversight management.

Section 6 – Appraisal Follow-up

Introduction

Upon completion of onsite appraisal activities, a number of tasks remain to close out an appraisal. These include conducting any necessary briefings, preparing and issuing a final appraisal report, assessing corrective action plans, submitting any policy issue papers, and preparing to follow the progress of corrective actions.

Goals

The primary goals of the follow-up phase are to prepare and disseminate an accurate account of the appraisal results through a final report and appropriate briefings; review proposed corrective actions for adequacy; and provide policy issue papers to the senior managers of appropriate Headquarters organizations.

Headquarters Briefings

The HS-63 Team Leader develops a one-page summary of appraisal results for submittal to the HS-63 Director. The one-page summary must be validated with site personnel to ensure factual accuracy. The purpose of the one-page summary is to communicate the results of the appraisal to senior DOE managers, including the Secretary, Deputy Secretary, Under Secretary, and/or the NNSA Administrator. Upon request, the HS-63 Director or Team Leader may be required to brief these senior managers on the one-page summary. Other senior Headquarters managers may be included at the discretion of the senior official being briefed.

After each inspection, the HS-60 Director and the HS-63 Director coordinate with the SO and the Office of the Secretary to develop an approach for providing results to external stakeholders, including any needed briefings. Such briefings to external stakeholders do not normally take place until after the final report is issued; Independent Oversight's responsibility is to provide the briefing on the inspection results.

Policy Issue Papers

Upon returning to Headquarters and before the report is finalized, HS-63 completes, if necessary, any policy issue papers and provides them to the manager(s) of the appropriate Headquarters organization(s). HS-63 then responds, as needed, to requests for discussions or for additional information pertinent to the issue(s) raised.

Final Report

The SO and the DOE/NNSA field element have ten working days from their receipt of the final draft report to provide HS-63 with their consolidated comments regarding its factual accuracy. HS-63 then considers the comments, holds consultations between managers and the appropriate staff members, and determines the HS-63 action on each response.

HS-63 prepares the final report for publication within ten working days after receipt of the consolidated comments. The final report is distributed to the Office of the Secretary, the Office of Emergency

Operations, the SO, the NNSA Deputy Administrator, and the DOE/NNSA field element. HS-63 makes further distribution of the final report as directed by the HS-60 Director.

Corrective Action Plans

Protocols for corrective action plan development, review, comment, and approval are contained in DOE Order 470.2(x), *Independent Oversight and Performance Assurance Program*. The major elements are summarized below.

Line management has ten working days to notify the SO and HS-60 of actions taken or compensatory measures planned for any emergency deficiencies that present an unacceptable immediate risk to workers, the public, the environment, or national security.

The cognizant line manager, with approval of the SO, must develop and implement corrective actions to address the findings in the appraisal report. Within 30 calendar days of the issuance of the final report, the responsible organization provides HS-63 and the SO with an *interim corrective action plan* addressing, in detail, ongoing and planned corrective actions for each deficiency identified in the final report. HS-63 reviews and comments on the interim corrective action plan within 15 calendar days of receipt and provides a copy to the SO. Within 60 calendar days of the issuance of the final report, the responsible organization issues a *final corrective action plan* approved by the SO. Final corrective action plans should address, in detail, all completed, ongoing, and long-term actions associated with each finding in the report.

Within 30 calendar days thereafter, the appropriate HS-63 personnel then review the final corrective action plan and provide comments and their bases to the responsible organization and SO.

Corrective Actions and Follow-up

After the final report has been distributed, HS-63 forwards report data and findings, if any, to the Office of Corporate Safety Programs (HS-31), who then enters this information into the Corrective Action Tracking System (CATS) database. In accordance with DOE Order 470.2(x), the responsible organization is charged with entering and updating corrective actions in CATS. Additionally, DOE Order 470.2(x) requires Independent Oversight to conduct follow-up reviews, on a selected basis, of appraisal findings to verify and validate the effectiveness of line management's corrective actions and to confirm closure of findings. HS-63 monitors the progress of and validates corrective actions through subsequent appraisals and follow-up reviews.

Section 7 – Records Management

Introduction

During the appraisal process, it is important to promote the integration of information gathered by individual team members so that each member may benefit from the efforts of the others. Upon completion of the onsite appraisal activities, it is incumbent upon the appraisal team to gather and archive the interim notes, reports, and other team documentation that was generated while conducting the appraisal. Information that documents the team's activities and thought processes during the appraisal should be gathered and archived to provide a historical record of the process by which appraisal findings were derived.

Record Keeping

Each member of an HS-63 appraisal team has a role in documenting assessment activities by: 1) developing planning documents; 2) documenting interviews and other site assessment activities; 3) retaining records of important documents that were reviewed; 4) recording performance results; and 5) documenting assessment conclusions in appraisal reports. The HS-63 Team Leader/Topic Team Leader is responsible for ensuring that key appraisal information is captured and retained. As a general rule, HS-63 does not retain classified information; rather, reference will be made to the classified information that was reviewed on site. The HS-63 Team Leader/Topic Team Leader is responsible for determining what site documentation is relevant to the conclusions developed from the appraisal. All appraisal documentation that is retained is for internal use only, except as authorized by the HS-63 Director. Specific information that should be retained from an inspection includes:

- Inspection plan
- Correspondence pertinent to the appraisal
- Daily reports (via Lotus Notes Inspection Database) in template form specified by the Team Leader
- Schedules of interviews (as recorded in individual daily reports)
- Performance tests that were conducted (as recorded in daily reports and the final report)
- Observations/supporting evidence (as recorded in individual daily reports)
- Records of key documents that were reviewed as part of the appraisal (as recorded in daily reports)
- Issue Forms, including site's written response to any Issue Form used
- Site factual accuracy comments on final reports and validation
- Final report.

Daily Report

Daily reports are considered to be a key information management tool for HS-63 appraisal teams. All appraisal team members are required to document their activities in daily reports using the Lotus Notes database and the associated report template. Information documented in the daily report should include records of meetings, interviews, walkdowns, and key document reviews; observations and/or supporting evidence; and difficulties encountered.

It is important that team members provide sufficient information to support the records management goals of the HS-60 appraisal process. All team members receive an initial orientation on the proper use of the Lotus Notes database to document their activities, and at the end of each appraisal, the HS-63 Team Leader ensures that each team member has completed his/her daily report file in Lotus Notes. After the final corrective action plan for an inspection has been approved, reviewed by the HS-63 Team Leader and HS-63 Director (as necessary), and placed in CATS, all team members' working notes concerning the inspection should be destroyed. The information found in Lotus Notes becomes the official record. Any deviation from this policy shall be discussed and approved by the responsible inspection team leader.

At the end of each appraisal, the Team Leader or HS-63 administrative person will make an electronic file of the supporting data as necessary (e.g., correspondence, inspection plans, corrective action plans, and site documents). This electronic record, along with any other pertinent archival documentation, shall be maintained in the Independent Oversight file for the subject appraisal report. These records shall be maintained for ten years.

Appendix A – Sample Document Request

1. Site Emergency Plan
2. Facility-specific emergency plans for selected facilities
3. Hazards surveys, emergency planning hazards assessments (EPHAs), and emergency action levels for selected facilities and transportation activities
4. Development/maintenance and implementing procedures applicable to hazards surveys, hazardous material screening, and EPHAs
5. Emergency operations center (EOC) position checklists for key contractor and DOE/NNSA field element positions (if not otherwise included in other emergency plan implementing procedures)
6. Index of all emergency plan implementing procedures (both sitewide and specific to selected facilities, as applicable)
7. Copies of DOE/NNSA field element and contractor emergency plan implementing procedures that address:
 - Incident command (life safety and security)
 - EOC activation
 - Event categorization/classification
 - Onsite/offsite emergency notifications
 - Protective action decision-making
 - EOC consequence assessment
 - Emergency public information.
8. Mutual aid memoranda of understanding/agreement between DOE/NNSA field element (or contractor) and primary offsite emergency response organizations (if not already included in the Site Emergency Plan)
9. Most recent ERO duty roster (or equivalent)
10. Emergency public information plan
11. Emergency preparedness training plan and related implementing procedures, including a matrix of required training courses/qualification status for emergency response organization members
12. Emergency preparedness drill and exercise plans and implementing procedures
13. Most recent annual exercise report
14. Schedule of drills and exercises
15. List of drills and exercises (including facility-level drills) completed in recent fiscal year(s)

16. Most recent emergency readiness assurance plan
17. Copies of any internal or external emergency management assessments for the past two years
18. List of open contractor and DOE/NNSA field element issue management/corrective action tracking system items related to emergency management, and items closed over the past two years
19. Any contract performance measures or other financial incentives related to emergency management program implementation.
20. Contractor emergency management (group) organization chart(s) or roster.