

ANNUAL EXERCISE AND FACILITY-LEVEL ERO

QUESTION: Does the Order require that an annual exercise be conducted for each facility (or group of facilities) that requires an EPHA?

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

Each DOE/NNSA facility subject to this CRD paragraph must exercise its emergency response capability annually and include at least facility-level evaluation and critique. Evaluations of annual facility exercises by Departmental entities (e.g., Cognizant Field Element, Program Secretarial Officer or Headquarters Office of Security and Safety Performance Assurance) must be performed periodically so that each facility has an external Departmental evaluation at least every three years. [DOE O 151.1C, Attachment 2, 6.b (1)]

Every DOE/NNSA Operational Emergency *Base Program* facility and *Hazardous Material Program* facility on a site is required by the CRD to exercise its response capability annually. This requirement can be satisfied by facilities in a number of ways. A Base Program facility can exercise emergency response capabilities annually as specified in the Order [DOE O 151.1C, Attachment 2, 6.a. (1)] or can satisfy their requirement by responding to an Operational Emergency (OE) as a collocated facility (e.g., receiving notifications and implementing protective actions).

In contrast, an exercise of facility-level ERO capabilities at a *Hazardous Materials Program* facility can involve a more substantial response than the *Base Program* facility, because the facility can be the source of hazardous material OEs as analyzed in its EPHA. The *facility-level* requirement in the CRD is focused on exercising the ERO associated with the facility (or group of collocated facilities that share the response organization) and its response to its own OEs. If a group of collocated facilities in an identified area on a site has a single response organization, then an exercise of the facility-level ERO capabilities at the area includes all of those facilities. This implies, of course, that all of the group facilities participate (e.g., at a minimum to implement necessary protective actions); the annual requirement is satisfied for the group facilities.

The facility exercise is not intended to be comparable to the annual site exercise in scope or in resources required for planning or conduct. The facility-level exercise need only involve those ERO capabilities that are specific to the facility; site-wide response can be simulated. Facility-level exercises can be accomplished with an exercise package that contains only the essential elements that are required to actually conduct the exercise. The facility exercise can alternatively be referred to as an evaluated drill to more accurately characterize its limited impact.