

ESTABLISH PRE-AUTHORIZATION CRITERIA FOR INITIAL DECISION MAKING

QUESTION: What is intended by the requirement in DOE O 151.1C, Chapter I, Section 9e that the Cognizant Field Element Manager “(e)nsure development of appropriate emergency plan implementing procedures for timely and accurate emergency classification, notification, and reporting of emergency events for facilities under their cognizance. Establish preauthorization criteria when possible.”

ANSWER: Emergency classification, notification, and reporting are intended to initiate actions to prevent or limit adverse health and safety impacts to workers and the public. The timeliness of the initiation of these actions is aided by pre-authorizing an on-duty manager (contractor or Federal employee) to perform emergency classification, notification, and reporting as well as initiating onsite protective actions and offsite protective action recommendations without waiting for a designated authority who may not be immediately available.

When possible, Emergency Plan Implementing Procedures (EPIPs) should incorporate clear, unambiguous decision criteria for categorizing/classifying Operational Emergencies (OEs) and for performing appropriate initial notifications and reporting. These *pre-authorization criteria* enable on-duty operators and managers, who are well-trained in using the criteria and implementing the decision-making process, to make time-critical decisions promptly, accurately, and confidently.

For OEs that are classified as an Alert, Site Area Emergency or General Emergency, these pre-authorization criteria are known as Emergency Action Levels (EALs). Requirements and guidance regarding EALs are long-standing. For those OEs that are only categorized, DOE G 151.1-4, Chapter 4, states: “Although it is not intended that facilities develop detailed and quantitative categorization criteria for each type of OE described in the Order, some planning and preparation will be needed to ensure that events meeting the Order descriptions are promptly recognized and categorized. For some types of OEs, facilities and sites may choose to develop facility- /site-specific criteria to aid in decision-making. For others, the guidance presented in this chapter may be useful in interpreting observed conditions directly against the Order descriptions.” The definitions of various OEs presented in the Order and the consideration of site- /facility-specific conditions will determine whether a specific OE lends itself to establishing specific pre-authorization criteria. Whether criteria are established or interpretation of the OE definition is required, on-duty managers must be adequately trained to make prompt, accurate decisions.