



U.S. Department of Energy  
Office of Inspector General  
Office of Audit Operations

# Audit Report

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The Department's Continuity  
Planning and Emergency  
Preparedness



## Department of Energy

Washington, DC 20585

August 11, 2004

MEMORANDUM FOR THE SECRETARY

FROM:

*Gregory H. Friedman*  
Gregory H. Friedman  
Inspector General

SUBJECT:

INFORMATION: Audit Report on "The Department's  
Continuity Planning and Emergency Preparedness"

### BACKGROUND

The Department of Energy is responsible for some of this Nation's most important and sensitive activities including: designing, producing, and maintaining the nation's nuclear weapons; conducting a broad range of efforts for national security applications; and, performing basic and applied research and development for potential defense and commercial applications. These activities are carried out at laboratories and other facilities located at sites throughout the United States.

Given the national interest in these activities, it is important that the Department have complex-wide contingency plans for continuity of operations and emergency management to address a broad range of potential threats and emergencies, such as accidents, technological emergencies, and military or terrorist attack-related incidents. As currently organized, such activities are the responsibility of the Department's Office of Security and Safety Performance Assurance and National Nuclear Security Administration (NNSA).

While the focus on continuity planning has increased in recent years, the Department has a long standing emergency management program that is directed toward protecting employees and the public and keeping them informed in times of crises. Emergency preparedness is one function of the emergency management program. It includes training and exercises of the emergency management system to identify needed improvements. We initiated this audit to determine whether the Department had implemented effective and comprehensive continuity of operations and emergency preparedness programs.

### RESULTS OF AUDIT

The five field sites we reviewed had not developed comprehensive plans to continue essential functions during an emergency and had not corrected a number of weaknesses identified during prior emergency preparedness exercises. Specifically, these sites had not fully identified essential functions or alternate facilities in case of an emergency. Additionally, the Department did not specifically require sites to validate the



effectiveness of corrective actions for addressing recognized emergency preparedness weaknesses or to share complex-wide lessons learned about common problems. As a result, the Department may face increased risks to its operations, employees, and surrounding communities during an emergency situation.

During our review, we noted that NNSA had initiated efforts to improve emergency preparedness including revising requirements for corrective actions and lessons learned sharing. Additionally, we observed that the facilities visited had been proactive in scheduling and performing a number of emergency preparedness exercises. However, additional action is necessary to ensure the development and implementation of comprehensive continuity of operations plans and the correction of deficiencies disclosed during emergency preparedness exercises are adequately addressed. Accordingly, we recommended a number of actions that, when completed, should help improve the Department's continuity of operations and emergency preparedness programs.

### MANAGEMENT REACTION

Management generally concurred with the report's findings and recommendations and agreed to expedite the completion of continuity of operations planning guidance that would be applicable to all facilities. In addition, management agreed to revise emergency preparedness requirements to ensure that sites establish a validation process for the completion of corrective actions and lessons learned sharing among field sites. Management's comments are included in Appendix 2.

Attachment

cc: Deputy Secretary

Acting Under Secretary for Energy, Science and Environment  
Administrator, National Nuclear Security Administration  
Acting Assistant Secretary for Environmental Management  
Director, Office of Security and Safety Performance Assurance  
Chief of Staff

# **REPORT ON THE DEPARTMENT'S CONTINUITY PLANNING AND EMERGENCY PREPAREDNESS**

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# CONTINUITY AND PREPAREDNESS PLANNING

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## Background

Federal requirements for continuity planning come from the Federal Emergency Management Agency (now a component of the Department of Homeland Security) which was designated as the lead agency to coordinate Federal continuity planning in 1998 as part of Presidential Decision Directive 67. The directive was designed to ensure agencies were prepared to continue essential functions during a broad range of threats and emergencies, such as accidents, technological emergencies, and military or terrorist attack-related incidents. The requirements of the directive include developing, documenting, and testing continuity of operations plans at all of the Department's facilities.

## Facilities Continuity Planning and Emergency Testing

Field sites had not developed comprehensive plans to continue essential functions during an emergency, and were not correcting all weaknesses identified during emergency preparedness exercises.

### Field Site Continuity Planning

None of the five sites we visited prepared and tested a fully documented continuity of operations plan. Based on data collected from June 2003 to June 2004 at the field sites, we determined that site-level plans had not been developed and documented in accordance with Federal guidance. We observed a lack of uniformity and varying approaches to continuity planning at each site. The chart below shows the status of continuity planning elements at each site<sup>1</sup>, with check marks denoting satisfaction of an element:

<b>Planning Element</b>	<b>Sandia</b>	<b>Hanford</b>	<b>Argonne</b>	<b>NETL</b>	<b>Los Alamos</b>
Essential functions identified					
Continuity plan exercised					
Orders of succession for key positions			√	√	√
Interoperable communications	√	√	√	√	√
Alternate facilities and prepare for unannounced relocation				√	
Vital records and databases protected and readily available		√		√	√

<sup>1</sup>Sites audited are more fully described in Appendix 4.

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As indicated in the preceding chart, the sites reviewed had not identified the essential functions that need to be continued in the event of an emergency. Identification of such essential functions is the foundation for determining what actions and resources are needed to provide for continued operations. A number of sites had addressed several of the elements associated with a continuity of operations plan; however, these elements were not part of a comprehensive plan. A narrative description of the status of site continuity plan elements is included as Appendix 1.

#### Recurring Emergency Preparedness Weaknesses

Since 1998, the Department has identified emergency preparedness weaknesses at various locations. In our current review, all five sites visited experienced recurring emergency preparedness weaknesses, some lasting over five years. For example:

- The Hanford Site (Hanford) did not properly identify or segregate simulated contaminated victims during emergency preparedness exercises in 2002 and 2003;
- Argonne National Laboratory (Argonne) did not secure event scenes during exercises in 2000 and again in 2001; and,
- The Sandia National Laboratories (Sandia) did not provide medical care in a timely manner to simulated victims during exercises conducted from 1998 to 2002.

Further, we noted that certain weaknesses disclosed as a result of emergency preparedness exercises are common among sites. For example, as in the case of the Hanford weakness discussed above, Los Alamos National Laboratory (Los Alamos) determined in 2002 that it did not properly segregate simulated contaminated victims. Similarly, both the National Energy Technology Laboratory (NETL) and Los Alamos determined that weaknesses existed in their communications capabilities during an emergency situation.

#### **Continuity and Corrective Actions**

Field sites did not fully plan for continuing essential operations because the Department had not developed specific guidance for preparing such plans. Additionally, the Department had not defined requirements for ensuring the effectiveness of corrective actions or sharing lessons learned among sites from emergency preparedness exercises.

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### Continuity of Operations Planning Requirements

Although general guidance existed at the Federal level, the Department did not provide sites with specific direction regarding the preparation of continuity of operations plans. For example, the Department had not defined what constitutes an essential function at the site level or established a timeframe for sites to complete their plans. A number of site officials told us that they did not intend to prepare continuity of operations plans until the Department defined exactly what was expected in the plans.

Office of Security and Safety Performance Assurance (SP) officials told us that they had developed draft guidance for field sites to use in preparing continuity of operations plans. However, the guidance has not been formalized. These officials indicated that they planned to revisit the guidance after a Government-wide continuity of operations exercise was completed by the Federal Emergency Management Agency in May 2004.

### Requirements for Corrective Actions

We also found that sites were not required to test the effectiveness of their actions to correct weaknesses. Consequently, certain weaknesses were identified during subsequent exercises when corrective actions had not been completely effective. For example, Hanford identified and implemented corrective actions as a result of the 2002 exercise that showed a weakness in identifying and segregating contamination victims. However, a 2003 emergency preparedness exercise demonstrated that the weakness continued to exist and additional corrective actions were needed--including procedural changes.

The Department recently implemented an enhanced corrective action validation process that could be applied to corrective actions identified during emergency preparedness exercises. This process, the Corrective Action Management Program (CAMP), includes SP findings, significant accidents, and other issues specifically directed by the Secretary or Deputy Secretary. CAMP requires that a field oversight official validate corrective actions as they are being developed and again, within six months after implementation to ensure that actions have adequately corrected the deficiency. Additionally, CAMP requires causal factor analyses of findings and emphasizes that corrective actions must prevent recurrence of the finding.

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In addition, we found that the Department did not require sites to have performance measures to ensure corrective actions were effective in preventing recurrences of exercise findings. For example, we noted that at least two of the sites we visited did not have performance measures to ensure that weaknesses identified during emergency preparedness exercises were effectively corrected.

#### System for Sharing Lessons Learned

Finally, the Department did not effectively utilize a lessons learned system for sites to review and consider the results and corrective actions taken by other facilities. To eliminate duplication of emergency management efforts across its field sites, the Department developed the Society for Effective Lessons Learned Sharing (SELLS) to centrally track and share lessons learned. However, sites were not required to use SELLS and it has not been effectively utilized by the Department. For example, sites had entered only 39 emergency management lessons learned in SELLS since 1995 and several emergency managers indicated that they currently did not use the database. In comparison, the five sites included in our review identified at least 95 weaknesses in 2002 alone, none of which were entered into SELLS. Hanford was the only site we visited that made use of SELLS and had entered 17 of the 39 lessons learned contained in the system.

#### **Lack of Improvements Could Lead to Increased Risk**

Without improvements in the continuity planning and emergency preparedness programs, the risk posed by emergency situations to the Department's operations, employees and the public is increased. For example, because planning had not been performed, Los Alamos did not identify a radioactive waste treatment facility as an essential function that needed to continue operations. During the Cerro Grande fire in 2000, Los Alamos employees had to enter a fire zone to continue operation of the facility. After the fire, Los Alamos made provisions to improve its capabilities to continue operations or permit a safe shutdown of the waste processing facility.

In addition, if known weaknesses are not effectively corrected such as in the area of communications, sites may not be able to maintain contact with facilities emergency management personnel or with local authorities, and may be unable to provide vital information to the public during emergencies. Further, the failure to ensure that lessons learned at one site are shared with others increases the risk



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that common weaknesses may not be identified and promptly corrected.

## **RECOMMENDATIONS**

To improve the Department's continuity planning and emergency preparedness program, we recommend that the Director, Office of Security and Safety Performance Assurance:

1. Expedite the completion of and ensure implementation of continuity planning guidance that includes field site requirements.

To ensure that the Department receives the full benefit from its emergency preparedness exercises, we recommend that the Administrator, National Nuclear Security Administration revise Department requirements to:

2. Consider use of the validation process in the Corrective Action Management Program - or similar validation requirements - to ensure corrective actions sufficiently address noted deficiencies. This process should include, at a minimum, requiring a field oversight official to validate corrective actions;
3. Require use of the existing lessons learned system, or another mechanism, to ensure that field sites share emergency management deficiencies and methods to address those deficiencies; and,
4. Establish performance measures related to timely implementation and validation of corrective actions from field site exercises.

## **MANAGEMENT REACTION**

In separate responses from the responsible programs, management generally concurred with the report's findings and recommendations. Management's comments are included in Appendix 2.

SP officials recognized the need to provide formal requirements and guidance to field elements regarding continuity of operations planning and agreed that such requirements and guidance needed to include timeframes and milestones for field site implementation. In addition, SP stated that it has already created draft guidance for field elements and indicated that it would promptly return to the guidance after a Government-wide continuity exercise. Additionally, SP noted that some field sites not included in the

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audit had already developed continuity plans in accordance with Federal guidance.

The National Nuclear Security Administration (NNSA) agreed to include specific requirements in the next revision to the applicable Departmental Order on "Comprehensive Emergency Management System" (DOE O 151.1B) for a validation process and the sharing of lessons learned from emergency preparedness exercises. NNSA also agreed to revise existing performance measures to address timely implementation and validation of corrective actions from field emergency response exercises and internal evaluations. Additionally, NNSA commented that it had initiated a continuity planning effort for its field sites earlier this year that, while still in formative stages, is an active effort led by Headquarters. Finally, NNSA agreed to establish timeframes for implementation of corrective actions in the Department Order.

EM acknowledged that Hanford had no stand-alone continuity plan and that planning for these objectives could be more detailed. However, EM believed that Hanford's site-wide and facility specific emergency planning addresses facility protection in depth. In addition, EM noted that it uses the Occurrence Reporting and Processing System to track and disseminate lessons learned. EM also noted that it had reorganized in Fiscal Year 2004 to streamline lessons learned activities and accelerate improvements in emergency continuity planning in the field. EM took issue with our presentation of recurring weaknesses and felt that the vast majority of weaknesses at Hanford have been effectively corrected. EM believes that an example of Hanford's recurring weaknesses was due to personal errors by responders and did not warrant site-wide corrective action.

## **AUDITOR COMMENTS**

Management's comments are generally responsive to our recommendations. Based on management's comments, we made several changes to the body of this report and modified our recommendations. However, we take exception to several of the comments from EM.

We noted that Hanford had made some effort to identify essential facilities that needed to be protected and secured as part of the emergency management function. However, they did not identify essential functions needed to continue operation during an emergency, and, had not completed and tested a detailed stand-alone continuity plan. Hanford officials acknowledged that while

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some elements of continuity planning had been addressed, they were continuing the process.

In regard to EM using the Occurrence Reporting and Processing System for lessons learned, this system did not contain issues identified in Hanford's emergency management exercises or those from other programs. In addition, EM sites would likely derive benefit from using a lessons learned system that includes the experiences of the entire complex.

We agree with EM's assertion that action has been taken to resolve many weaknesses in emergency management. However, we noted recurring weaknesses at each site we visited, including Hanford. As such, the report recommends implementation of a comprehensive program to address weaknesses identified during emergency preparedness exercises.

# Appendix 1

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## STATUS OF CONTINUITY OF OPERATIONS PLANS

None of the sites we visited had a comprehensive continuity of operations plan. Specific information on the status of the various planning elements of the continuity of operations plans follows.

**Essential Functions Identified:** None of the field sites in our review determined or prioritized which functions must be continued under all circumstances. Several sites told us that they had identified critical facilities or personnel that need to be protected, but the information had not been included in an overall continuity of operation plan.

**Continuity Plan Exercised:** None of these sites tested continuity plans, however Los Alamos and Hanford officials felt that their experiences dealing with recent, real-life emergencies provided the same benefit.

**Orders of Succession:** Two sites had not identified or established current orders of succession for key positions. Sandia officials asserted an order of succession for emergency management was developed, but not well documented. Hanford's succession plan was not current.

**Interoperable Communications:** All sites had some interoperable communications. Absent detailed continuity planning documents, however, we could not ascertain whether this capability was sufficient to support continued operation of essential functions.

**Alternate Facilities and Preparation for Unannounced Relocation:** Only NETL had an alternate facility to provide capability to perform essential functions and sustain operations for a period up to 30 days. Sandia officials stated that they have limited capabilities in this area, but have designated an alternate building that could be used in the event of an emergency. Other sites' responses were limited to back-up facilities for emergency operating centers only.

**Vital Records and Databases Identified and are Recoverable:** Three sites had made provisions for the protection and availability of records and systems needed to support essential functions. Argonne has identified and provided for recovery of financial documents, however, programmatic documents are uncertain. Sandia has a vital records program, which includes procedures for protecting vital and important computer records. However, Sandia is still developing procedures for protecting non-computer records.




**Department of Energy**  
**National Nuclear Security Administration**  
Washington, DC 20585



MAY 06 2004

MEMORANDUM FOR Rickey R. Hass  
Assistant Inspector General  
for Audit Services

FROM: Michael C. Kane   
Associate Administrator  
for Management and Administration

SUBJECT: Comments to Draft IG Report on Continuity  
Planning and Emergency Preparedness

The National Nuclear Security Administration (NNSA) appreciates the opportunity to comment on the Inspector General's (IG) draft report, "The Department's Continuity Planning and Emergency Preparedness." We understand that the IG conducted this audit in 2003 to determine whether the Department has implemented effective and comprehensive continuity-of-operations and emergency preparedness programs.

Although NNSA generally agrees with the report and the recommendations, I believe the report should acknowledge that the Department had initiated a program to improve emergency preparedness prior to the audit. Continuity planning for NNSA field elements has continued to develop since the data collection period. Revised emergency preparedness requirements, including those for corrective action management and lessons learned, and improvements to the Departmental Emergency Preparedness guidance are in process.

In regards to the recommendations, NNSA offers the following specific comments:

Recommendation 1 – Directed towards the Office of Security and Safety Performance Assurance to expedite the completion of continuity planning guidance;

Concur – NNSA commenced a planning and development effort at the beginning of this year with all of our field elements to develop specific office Continuity of Operations Plans (COOP). While still in the formative stages, there is an active and coordinated effort to develop these plans with guidance provided by NNSA Headquarters.



**Recommendation 2 – Directed towards the Administrator to establish time frames for implementation of corrective actions.**

**Concur –** The requirement for the establishment of time frames will be addressed during the development of the next revision of DOE O 151.1B, “Comprehensive Emergency Management System,” currently underway. The revision to the Order is expected to include a requirement that is consistent with other DOE directives. This revision is expected to be available in the directives system for review and comment in late May 2004.

**Recommendation 3 – Directed towards the Administrator to consider use of the validation process in the corrective action management program.**

**Concur –** As with recommendation 2 above, the requirement for a validation process that is consistent with other DOE directives and similar to the Corrective Action Management Program will be included in the revision to DOE O 151.1B. This revision, as stated above, will be available for review and comment by the end of May 2004.

**Recommendation 4 – Directed towards the Administrator to require the use of an existing lessons learned system.**

**Concur –** As with recommendations 2 and 3 above, the requirement to share lessons learned will be incorporated into the revision of DOE O 151.1B that will be available for review and comment by the end of May 2004.

**Recommendation 5 – Directed towards the Administrator to establish performance measures.**

**Concur –** NNSA has a set of performance measures within emergency management. We will revise these performance measures to address the timely implementation and validation of corrective actions from field emergency response exercises and internal evaluations.

Additionally, we recommend that the IG consider a recommendation directed at improving line management implementation issues associated with the failure to correct deficiencies noted during emergency response exercises.

Should you have any questions related to this response, please contact, Richard Speidel, Director, Policy and Internal Controls Management. He may be contacted at 202-586-5009.

cc: Joseph Krol, Associate Administrator for Emergency Operations

## Appendix 2

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May 4, 2004

MEMORANDUM FOR: GREGORY H. FRIEDMAN  
INSPECTOR GENERAL

FROM: GLENN S. PODONSKY, SP-1

SUBJECT: Comments on the Draft Inspection Report "The Department's  
Continuity Planning and Emergency Preparedness"

As requested in the April 8, 2004, memo from the Acting Assistant Inspector General for Audit Services, The Office of Security and Safety Performance Assurance (SP) coordinated review and comments on the subject IG draft report. SP concurs with recommendation 1 in the subject report that SP expedite the completion of continuity planning guidance that includes timeframes, milestones, and field site requirements. While several DOE sites that were not included in your inspection have already developed COOP plans based on applicable Federal guidance, SP recognizes the need to provide additional formal requirements and guidance to Field elements regarding COOP planning.

As you may know, the Office of Security (SO) within SP has developed a draft DOE continuity of operations (COOP) order that identifies specific responsibilities and requirements for developing Field-level COOP plans and implementing procedures. Following the May government-wide COOP exercise, SP plans to promptly return to the draft order, make the necessary revisions to reflect recent organizational changes, and continue the order review and issuance process.

Comments from the Office of Science and the April 27 memorandum from Jessie Roberson, with attached comments from the Richland Operations Office are also attached to this memorandum for your consideration. This comment package has also been provided, electronically, to Ricky Hass, IG-34, via e-mail.

Should you need additional information, please contact me at (301) 903-3777 or Kathy McCarty, the DOE COOP Program Manager, at (301) 903-8812. We appreciate the opportunity to comment on this report.

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Glenn S. Podonsky, Director  
Office of Security and Safety  
Performance Assurance

Attachments: Office of SC Comments  
Jessie Roberson April 27, 2004, Memo

cc:  
J. Roberson, EM-1  
R. Orbach, SC-1  
M. Combs, SO-1  
R. Hass, IG-34  
R. Speidel, NA-66  
L. Gasperow, SP-1.2



### Attachment 1

#### Office of Science Comments on IG Draft Report "The Department's Continuity Planning And Emergency Preparedness

**Page 2, paragraph 3.** This paragraph is vague. Please provide clarification of what recurring security problems in site exercises were identified at the Argonne National Laboratory East (ANL-E) site.

**Page 2, paragraph 5.** The building in which the Emergency Response Center (ERC) is located does have back-up power, and the ERC will be tapped into this back-up power next week, ahead of schedule. ANL-E self-identified this deficiency in response to a more general recommendation regarding ERC location, issued in a February 2003 exercise report. The completion of the corrective action will be a little over a year and not the two year timeframe implied in the draft report.

**General statement.** The issue of recurrence of findings during emergency exercises has been brought up for all sites. It has been the DOE Argonne Site Office and ANL-E experience that even where seemingly appropriate corrective actions are implemented for a particular finding, the adequacy of corrective actions may not be measurable until tested in a subsequent exercise, at which point some lesser form of additional recurrence may be noted. Although such a recurrence implies that more work is needed, it doesn't necessarily indicate a system failure.




## Department of Energy

Washington, DC 20585

April 27, 2004

**MEMORANDUM FOR:** GLENN PODONSKY  
DIRECTOR FOR SECURITY AND SAFETY  
PERFORMANCE ASSURANCE

**FROM:**   
JESSIE HILL ROBERSON  
ASSISTANT SECRETARY FOR  
ENVIRONMENTAL MANAGEMENT

**SUBJECT:** Response to the Inspector General (IG) Draft Report for  
the Audit "The Department's Continuity Planning and  
Emergency Preparedness"

The Office of Environmental Management (EM) has completed a review of the subject IG Draft Report. EM comments are limited to those issues regarding the EM Headquarters emergency preparedness program and the Hanford Site, the only EM site addressed in the audit.

EM uses the Occurrence Reporting and Processing System to track and disseminate lessons learned. Each week, the Field Office Managers and EM Headquarters Senior Managers discuss notable occurrences to ensure pertinent information is shared. In addition, EM Headquarters reorganized in early FY2004. In part, this was done to streamline 'lessons learned' activities and to hasten improvements in emergency management and continuity of government preparedness at EM field locations.

Attached are detailed comments from the Richland Operations Office (RL) subject report for your consideration.

Should you have questions regarding these comments, please address them to Maurice Daugherty of my staff at 3-9978.

Attachment



Printed with soy ink on recycled paper

### **Richland Operations Office Comments**

The Richland Emergency Preparedness (EP) Program Manager and the Fluor Hanford, Inc. Emergency Preparedness support team have reviewed the draft report and provide the following comments. Because the draft audit report was apparently designed to reflect the DOE-wide continuity planning and emergency preparedness, our comments are limited to the accuracy relative to Hanford, the examples cited, and, most significantly, the conclusion that Hanford is not adequately prepared.

While we do not believe the report presents justification for the recommendations provided, due to the inaccuracies, we do not have specific comments on the recommendations. We do strongly believe that the Hanford program appropriately manages the issues addressed by recommendations 2-5 without need for Department direction, but cannot comment on whether other sites may benefit from guidance. RL fully supports the need for complex-wide guidance and direction on continuity of operations planning expectations, as described in recommendation 1. Specific comments follow:

#### **1. Memorandum**

##### **Results of the Audit**

- Paragraph 1, line 1 – Richland strongly disagrees with the summary statement “We observed that all five sites we visited were not adequately prepared to maintain or resume operations or fully protect employees and the public in the event of a disaster or other emergency.” This broad, significant observation is not supported by the facts presented in the report as is evidenced by the limited scope of the recommendations developed. Recommendations presented were related to corrective action management and continuity of operations planning, neither of which are indications of the overall inadequacy communicated by this statement. Hanford has demonstrated the ability to protect workers and the public in actual emergencies and many exercises. It is suggested that this conclusion statement be revised to reflect the need for improvement in the identified areas, rather than asserting that the entire program is inadequate.
- Third Bullet – The Hanford Site EP has initiated corrective actions for site-wide exercise issues. Following the 2002 Field Exercise, the Hanford site EP recognized the need for site-wide improvements with regards to radiological response. The EP staff worked with Site Radiological Control Organizations in conducting Hazard Assessor workshops in conjunction with radiological control recertification training. The program has initiated other corrective actions to rectify potential site-wide issues.

## 2. Report

### Page 1, Field Site Continuity Planning

- Paragraph 1 – The report does not clearly distinguish between emergency preparedness program requirements and those additional elements that may be required to address continuity of operations. This lack of clarity appears to have resulted in inaccurate statements. For example, it is not true that Hanford has not “...established plans to protect essential facilities, reduce or mitigate disruptions to operations, or achieve timely and orderly recovery from emergencies.” While there is no stand-alone continuity of operations plan for Hanford and none has been directed at the field by Department of Energy Headquarters, Hanford’s site-wide emergency planning and facility-specific emergency planning do address these functions in depth. It may be accurate to state that planning for these objectives could be expanded or more detailed, but to state that it does not exist is incorrect.
- Bullet 2 - This is not an example of a continuity of operations issue. As written, it appears to be an example of a recurring issue and one with which we do not agree. While the two issues both involved some aspect of protective actions, the cause was personal error by responders from different organizations. Corrective actions were implemented through lessons learned review for affected personnel. The corrective action process included review to determine if there was a collective significance that warranted a site-wide corrective action and there was not. This was validated by the successful implementation of protective actions in the 2003 Field Exercise.

### Page 2, Recurring Weaknesses

Recommend the opening statement of the section be revised to read, “...actions taken by each of the sites we visited were not always completely effective ...” The vast majority of issues identified during Hanford exercises have been effectively corrected. Considering the very critical evaluation we conduct for our 4 exercises per year, one or two examples of what could subjectively be seen as repeat issues certainly do not constitute a “pervasive” situation.

## Appendix 3

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### PRIOR REPORTS

#### Office of Inspector General Related Reports

- *Power Marketing Administration Infrastructure Protection* (OAS-B-03-01, April 2003). The audit disclosed that vulnerability and risk assessments for critical assets at Western and Southwestern Power Marketing Associations were either inadequate or did not exist.
- *Emergency Medical Coordination Memorandum of Agreement at Brookhaven National Laboratory* (DOE/IG-0594, March 2003). According to this inspection, Brookhaven had not fully implemented the terms of its emergency medical response agreement with Stony Brook University Hospital. Further, the medical response agreement as well as other key emergency response documents had not been updated or reviewed.
- *Cyber-Related Critical Infrastructure Identification and Protection Measures* (DOE/IG-0545, March 2002). The audit noted that the Department had not made sufficient progress in identifying and developing protective measures for critical infrastructures or assets. Also, the Department had not devoted sufficient resources to identifying and developing protective measures for cyber-related assets.
- *Implementation of Presidential Decision Directive 63, Critical Infrastructure Protection* (DOE/IG-0483, September 2000). The audit disclosed that the Department had not implemented its critical infrastructure protection plan to mitigate significant vulnerabilities, or assure the continuity and viability of its critical infrastructures. Planning and assessment activities required by Presidential Decision Directive 63, such as critical asset identification, vulnerability assessments, and corrective action plans remained incomplete.

#### Government Accountability Office Related Reports

- *Continuity of Operations, Improved Planning Needed to Ensure Delivery of Essential Government Services* (GAO-04-160, February 2004). While all but 3 of the agencies reviewed had developed and documented some elements of a COOP plan, none of the agencies provided documentation sufficient to show that they were following all the guidance in the Federal Emergency Management Agency Federal Preparedness Circular 65.
- *Homeland Security, Challenges in Achieving Interoperable Communications for First Responders* (GAO-04-231T, November 2003). GAO found that Federal, state, and local Governments face several major challenges in addressing interoperability in their wireless communications. These challenges include 1) identifying and defining the interoperability problem; 2) establishing national goals and standards; and, 3) defining intergovernmental roles.

## Appendix 3

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- *Critical Infrastructure Protection, Challenges for Selected Agencies and Industry Sectors* (GAO-03-233, February 2003). GAO found that each of four agencies, including the Department of Energy, had made progress in implementing several PDD 63 requirements. However, none of the agencies had fully implemented all requirements, including the fundamental processes of identifying agency assets that are critical to the nation and determining their dependencies on other public and private assets.

## Appendix 4

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<b>OBJECTIVE</b>	The objective of this audit was to determine whether the Department has implemented effective and comprehensive continuity of operations and emergency preparedness programs.
<b>SCOPE</b>	We conducted the audit from June 2003 to August 2004 at Department of Energy Headquarters in Washington, DC; the Sandia National Laboratories in Albuquerque, New Mexico; the Los Alamos National Laboratory in Los Alamos, New Mexico; the Hanford Site in Richland, Washington; the Argonne National Laboratory in Argonne, Illinois; and the National Energy Technology Laboratory in Pittsburgh, Pennsylvania, and Morgantown, West Virginia.
<b>METHODOLOGY</b>	<p>To accomplish the audit objective, we:</p> <ul style="list-style-type: none"><li>• Reviewed applicable Federal regulations, Departmental orders, and implementing procedures and practices;</li><li>• Reviewed and analyzed exercise and/or drill evaluation reports at selected sites;</li><li>• Reviewed and analyzed information pertaining to corrective action plans for exercise and/or drill findings;</li><li>• Obtained and reviewed hazard surveys and/or hazard assessments at selected sites;</li><li>• Obtained and reviewed Emergency Management Plans at selected sites;</li><li>• Reviewed performance related information to determine compliance with the Government Performance and Results Act of 1993;</li><li>• Held discussions with Headquarters officials regarding the Department's continuity of operations planning and emergency management; and,</li><li>• Held discussions with officials from Sandia, Los Alamos, and Argonne National Laboratories, as well as the National</li></ul>

## Appendix 4

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Energy Technology Laboratory and Hanford Site regarding the Department's continuity of operations planning and emergency management.

The audit was performed in accordance with generally accepted Government auditing standards for performance audits and included tests of internal controls and compliance with laws and regulations to the extent necessary to satisfy the audit objective. Accordingly, the assessment included reviews of Departmental and regulatory policies, procedures, and performance measures related to the Department's continuity of operations planning and emergency management. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not rely on the data contained in SELLS, therefore, we did not conduct any reliability assessments on the data.

The exit conference was held with management on August 5, 2004.



## CUSTOMER RESPONSE FORM

The Office of Inspector General has a continuing interest in improving the usefulness of its products. We wish to make our reports as responsive as possible to our customers' requirements, and, therefore, ask that you consider sharing your thoughts with us. On the back of this form, you may suggest improvements to enhance the effectiveness of future reports. Please include answers to the following questions if they are applicable to you:

1. What additional background information about the selection, scheduling, scope, or procedures of the inspection would have been helpful to the reader in understanding this report?
2. What additional information related to findings and recommendations could have been included in the report to assist management in implementing corrective actions?
3. What format, stylistic, or organizational changes might have made this report's overall message more clear to the reader?
4. What additional actions could the Office of Inspector General have taken on the issues discussed in this report which would have been helpful?
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