

EMERGENCY PREPAREDNESS (EP)

OBJECTIVE

EP.1: The Site Office has procedures and mechanisms, including oversight processes, in place and has established and implemented a Comprehensive Emergency Management Program (CEMP) that complies with DOE Order 151.1C requirements.

CRITERIA

1. The Site Office's processes, procedures and organization are adequate to accomplish CEMP responsibilities including oversight of the Site Contractor. (DOE O 151.1C; NA-1 SD 411.1-1C).
2. The Site Office procedures and mechanisms ensure that the Site Contractor has developed a CEMP that incorporates each of the 15 program elements of the DOE O 151.1C and the contractor requirements document (DOE 151.1C).
3. Emergency Preparedness Hazards Surveys (EPHSs), Emergency Preparedness Hazards Assessments (EPHAs), and Emergency Planning Zone (EPZ) documents have been reviewed and approved by the Site Office. Required documents have been submitted to appropriate Headquarters offices. Emergency Action Levels (EALs), protective actions (PAs), and protective action recommendations (PARs) have been developed based on the results of the EPHAs (DOE O 151.1C).
4. The Site Office has ensured that emergency plans and emergency plan implementing procedures (EPIPs) are prepared, reviewed annually, and updated (as necessary) for all facilities under their purview and integrated within the overall CEMP. The annual update to the emergency plan has been submitted to appropriate Headquarters offices (DOE O 151.1C).
5. The Site Office has ensured that the site contractor develops procedures for timely and accurate emergency classification, notification, and reporting of emergency events for facilities under their cognizance (DOE 151.1C).
6. The Site Office has participated with the site contractor in the development of agreements and other coordination activities with State, Tribal, and local agencies and organizations responsible for offsite emergency response and for protection of the health and safety of the public. The Site Office has also ensured the effectiveness of a continuing emergency preparedness program with offsite interface organizations. (DOE O 151.1C).
7. The Site Office has established and maintained an Emergency Operations Center (EOC) to respond to emergency events if not collocated with the site contractor's command center. Emergency command center systems and capabilities are

- effectively maintained and system operability periodically verified (DOE O 151.1C).
8. The Site Office ensures that Site Office personnel and site contractors participate in a continuing emergency preparedness program of training, drills, and exercises. The site drill and exercise programs include scenarios representative of emergency situations that could develop as a result of upsets or accidents associated with operations within each nuclear facility. The program meets the minimum requirements of the CEMP for nuclear operations. Drill and exercise program records reflect a satisfactory state of site readiness to respond to site emergencies associated with activities and operations at nuclear facilities (DOE 151.1C; DOE O 422.1; DOE O 426.2)
 9. The NNSA Headquarters, the Site Office and site contractor conduct comprehensive assessments of the CEMP at the required periodicity specified in the CEMP. The records of the assessment indicate the program is adequate and complies with contract requirements. Issues identified are managed, tracked, and effectively resolved. Lessons learned are included in site training activities (DOE O 151.1C; DOE O 226.1A, NA-1 SD 226.1AB).
 10. The Site Office reviews and approves Emergency Readiness Assurance Plans (ERAPs) that cover facilities under their supervision and submits a consolidated ERAP to appropriate Headquarters offices (DOE 151.1C).
 11. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A, NA-1 SD 226.1A)
 12. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to carry out CEMP responsibilities and to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

APPROACH

References:

- DOE O 151.1C, *Comprehensive Emergency Management System*
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- DOE O 422.1, *Conduct of Operations*
- DOE O 426.2, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*

- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
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Record Review:

- Review approved Site Office procedures used to implement the CEMP (e.g., administrative procedures, organizational charts, position descriptions, or internal memoranda) to determine the extent to which these procedures establish the roles, responsibilities, interfaces, and staffing levels for the emergency management organization
- Review Site Office procedures and organizational information to evaluate the approval and oversight mechanisms of the contractor's CEMP
- Review Site Office assessments and operational awareness information concerning the contractor CEMP. Evaluate assessments and feedback and improvement mechanisms that demonstrate effectiveness of the contractor's CEMP

Interviews:

- Interview selected Site Office line managers and personnel who are assigned CEMP responsibilities to determine if they are familiar with their roles, responsibilities, and interfaces with respect to the Site Office CEMP and oversight of the Site Contractor CEMP. Verify that these personnel have adequate knowledge of Site Office and Site Contractor CEMP procedures

Observations:

- If possible, observe Site Office oversight (other than Facility Representatives (FR)) of the Site Contractor's CEMP
- Observe FR oversight of the Site Contractor's CEMP