

6. EXERCISES		
<p>Performance Goal: A formal exercise program validates all elements of an emergency management program over a 5-year period. The exercise program validates facility- and site-level emergency management program elements by initiating response to simulated, realistic emergency events/conditions in a manner that, as nearly as possible, replicates an integrated emergency response to an actual event. Planning and preparation use an effective, structured approach that includes documentation of specific objectives, scope, time lines, injects, controller instructions, and evaluation criteria for realistic scenarios. Each exercise is conducted, controlled, evaluated, and critiqued effectively and reliably. Lessons-learned are developed, resulting in corrective actions and improvements. [DOE O 151.1C, Attachment 2 (CRD). 6 and DOE O 151.1C, Chapter IV, paragraph 4b, Exercises.]</p>		
<ol style="list-style-type: none"> 1. Objective: Establish a formal exercise program that validates all elements of the emergency management program. [DOE O 151.1C, Attachment 2 (CRD).6.b.] 2. Objective: Plan for exercises using an effective, structured approach designed to test the site’s integrated emergency response capability. [DOE O 151.1C, Attachment 2 (CRD).6 and 6.b.(2) and DOE G 151.1-3, P3.3] 3. Objective: Prepare for exercises using an effective, structured approach designed to simulate realistic emergency events/conditions for facility-specific hazards in a manner that, as nearly as possible, replicates an integrated emergency response to actual event. [DOE O 151.1C, Attachment 2 (CRD).6 and 6.b.(2) and DOE G 151.1-3, P3.3, P3.4, and P3.34] 4. Objective: Conduct and control exercises effectively and reliably. [DOE O 151.1C, Attachment 2 (CRD).6. and DOE G 151.1-3, 3.10, P3-36] 5. Objective: Critique and evaluate exercises effectively and reliably. [DOE O 151.1C, Attachment 2 (CRD).6 and DOE G 151.1-3, 3.11, P3-40] 6. Objective: Document exercise performance and maintain records, including corrective actions, improvements, and lessons learned. [DOE O151.1C, Attachment 2, 6. and DOE G 151.1-3, 3.11.3, P3-46] 		
OBJECTIVE		
6.1	Establish a formal exercise program that validates all elements of the emergency management program.	DOE O 151.1C, Attachment 2 (CRD).6.
Criterion		
6.1.1	A structured exercise program is implemented that validates all elements of the emergency management program over a five-year period, and includes building evacuation exercises consistent with Federal regulations and regular communication system tests with DOE-HQ and offsite agencies.	DOE O 151.1C, Attachment 2 (CRD).6.a.(1) and (2)
Lines of Inquiry		
	Does the exercise program ensure building evacuation exercises or drills are conducted annually, at a minimum, as required by Federal regulations [e.g., (41 CFR 102-74-360)], local ordinances, or NFPA standards], to ensure that employees are able to safely evacuate their work area?	DOE O 151.1C, Chap. III.4.b.(1) & DOE G 151.1-3, P4.5
	Does the exercise program ensure communications with DOE Headquarters (HQ), the Cognizant Field Element, and offsite agencies tested at least annually or as often as needed to ensure that communications systems are operational?	DOE O 151.1C, Chapter III.4.b.(2) & DOE G 151.1-3, P4.6
	Have formal plans and procedures been developed to ensure all elements of the emergency management program are validated over a five-year period?	DOE O 151.1C, Chap. I.10.b, Chap. IV.4.b, Chap X.1 & DOE G 151.1-3, D.3.3 and P4.1a

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	Does the exercise program require that both facility- and site-level emergency management program elements are validated by initiating response to simulated, realistic emergency events/conditions in a manner that, as nearly as possible, replicates an integrated emergency response to an actual event?	DOE G 151.1-3, D.3.3
	Does the exercise program include provisions for incorporating objectives in each exercise that are designed to validate revised plans/procedures, corrective actions, and program improvements?	DOE O 151.1C, Chap.IV.4.b & DOE G 151.1-3, P4.1b
	Does the exercise program include provisions for evaluating all exercises and establish a critique process, which includes gathering and documenting findings and opportunities for improvement of participants?	DOE O 151.1C, Chap.IV.4.b & DOE G 151.1-3, P4.1c
	Does the exercise program ensure Site Operations-Based Exercises are conducted at least annually to test the integrated emergency response capabilities of personnel in facility- and site-level ERO positions, and includes both facility- and site-level evaluation and critique? (Note: For multi-facility sites, the basis for the exercise is rotated among facilities or groups of facilities.)	DOE O 151.1C, Chap.IV.4.b. (1)(b) & DOE G 151.1-3, P4.2
	Does the exercise program ensure Facility Operations-Based Exercises are conducted annually for each EPHA facility or group of facilities with common facility-level ERO positions to test the proficiency of personnel in facility-level ERO positions in accomplishing facility-specific emergency response duties and responsibilities?	DOE O 151.1C, Chap.IV.4.b(1)(a) & DOE G 151.1-3, P4.2
	Does the exercise program ensure Full Participation Exercises that include the participation of offsite organizations are conducted at least once every three years? (Note: The site is required to invite offsite organizations to participate every 3 years, but is not responsible for ensuring they participate.)	DOE O 151.1C, Chap.IV.4.b. (1)(c) & DOE G 151.1-3, P4.2
	Does the exercise program ensure exercises of each of the Department’s radiological emergency response assets that could be used to support the site are conducted at least once every three years? These assets include the Accident Response Group (ARG), Nuclear Emergency Support Team (NEST), Federal Radiological Monitoring and Assessment Center (FRMAC), Aerial Measuring System (AMS), National Atmospheric Release Advisory Center (NARAC), Radiation Emergency Assistance Center/Training Site (REAC/TS), and Radiological Assistance Program (RAP).	DOE O 151.1C, Chap.IV.4.b.(2) & DOE G 151.1-3, P4.4
	Does the exercise program ensure exercises are conducted for personnel who will interact with the media, and that adherence to emergency public information policies and requirements is demonstrated during exercise evaluations?	DOE O 151.1C, Chap.IX.2.d.(2) and IX.3
	Does the program ensure serious performance problems resulting in findings and/or failed goals/objectives, as determined by a DOE or NNSA organization responsible for evaluating the exercise, are reevaluated during a drill, exercise, or through a selected functional test within a fixed time period following the exercise?	DOE G 151.1-3, P4.7
	Does the exercise program include No-Notice Exercises (NNXs) conducted to determine if the ERO can accomplish selected objectives based on applicable plans, procedures, and/or other established requirements, and is involvement limited to providing trusted agents and responding when the exercise is conducted?	DOE O 151.1C, Chapter X.2.d & DOE G 151.1-3, P5.8
	Does the exercise program ensure a broad spectrum of potential operational and security events are tested over a five-year period, including a variety of event initiators?	
	Does the exercise program ensure scenarios are challenging for Players (i.e., not simplistic scenarios used for the purpose of ensuring responders “Pass” and/or merely “check a box” to meet minimum requirements?	
	Does the exercise program ensure severe event exercises (i.e., beyond-design-basis) are conducted periodically that require the site to plan for events beyond their normal response capabilities and include a timeframe for self-sufficiency?	

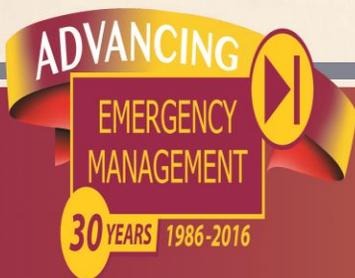
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	<p>Are severe event exercises conducted periodically that include damage to multiple hazardous material facilities, command centers, and/or facilities used to implement protective actions, as well as require responders to perform activities such as:</p> <ul style="list-style-type: none"> confirm the habitability of the primary or alternate emergency operations center establish alternate command centers as operational power essential equipment from backup power sources communicate using backup systems analyze consequences using sophisticated modeling programs and under real-time meteorological conditions implement severe planning with state and local governments validate offsite consequence models integrate with national radiological response assets? 	
Criterion		
6.1.2	Schedules are in place to manage long- and short-range planning for exercises.	DOE G 151.1-3, P3.3/3.4
Lines of Inquiry		
	Have long-range schedules been developed for validating all the elements of each program (including both site and facility response organizations), including provisions to incorporate specific objectives in exercises over a 5-year period (e.g., matrix)?	DOE G 151.1-3, P4.1a
	Have short-range schedules been developed containing information about specific aspects of emergency response to be tested in the current year?	DOE G 151.1-3, P4.1a
	Do exercise schedules include periodic participation by appropriate DOE or NNSA radiological response assets, if the facility/site plans to use the assets in response to an emergency?	DOE G 151.1-3, P4.3
	Does the schedule of exercises include security scenario events to test the interfaces between the site security organization and the facility/site ERO?	DOE G 151.1-3, P4.3
APPROACH		
Document/Record Review		
	Review the site ERAP and emergency plan	
	Review the EPHAs and EPIPs for facilities of interest.	
	Review after-action reports for the last two calendar years.	
	Review exercise plans/records for the last two calendar years.	
	Review exercise program description/manual/procedures.	
	Review exercise corrective action plans and closure files.	
	Review 5-year exercise schedule.	
Interview		
	Interview contractor emergency management exercises lead.	
	Interview exercise program lead.	
	Interview emergency management program lead.	
	Interview DOE field office emergency management program manager.	
Observation		
	None	
OBJECTIVE 2		
6.2	Plan for exercises using an effective, structured approach designed to test the site's integrated emergency response capability.	DOE O 151.1C, Attachment 2 (CRD).6 and 6.b.(2) and DOE G 151.1-3, P3.3

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Criterion		
6.2.1	Exercises are coordinated by a planning team consisting of all participating organizations.	DOE O 151.1C, Attachment 2 (CRD),6 and DOE G 151.1-3, 3.6.1, P3-12
Lines of Inquiry		
	Is exercise planning coordinated with representatives from participating onsite and offsite organizations?	DOE G 151.1-3, CE4.1
	Are limitations or simulations regarding the participation of onsite and offsite organizations or groups fully identified and documented during the planning process?	DOE G 151.1-3, CE4.1
	When planning for No-Notice Exercises, are trusted agents used and did they plan to ensure players had no knowledge of the exercise, to include date, time, and/or scenario, prior to initiation?	DOE G 151.1-3, P5.8
Criterion		
6.2.2	Exercise Plans are developed using a structured approach that includes documentation of specific objectives, scope, time lines, injects, controller instructions, and evaluation criteria for realistic scenarios.	DOE O 151.1C, Attachment 2 (CRD),6.
Lines of Inquiry		
	Are Exercise Plans developed according to planning schedules that include sufficient information for effective conduct, control, and evaluation?	DOE G 151.1-3, CE4.2, 4.3, 4.4, 4.7 and D.3.3
	Do Exercise Plans include clear, measurable objectives that provide the basis for evaluating/validating the performance of response capabilities of each participating organization?	DOE G 151.1-3, CE4.5 and 4.6
	Do Exercise Plans include sufficient information for effective conduct, control, and evaluation? This includes specific exercise objectives, scope, scenario, participants, simulations, time lines, injects/messages, technical data, safety and security provisions, controller instructions, and evaluation criteria.	DOE O 151.1C, Chap IV.4.b & DOE G 151.1-3, CE4.2, 4.3, 4.4, 4.7 and D.3.3
	Are Exercise Plans for the annual site Full-Scale evaluated exercise completed in sufficient time before the conduct of the exercise to allow for review and comments by DOE or NNSA line management and the DOE Associate Administrator of Emergency Operations?	DOE O 151.1C, Chap 1.9.w & Chap.IV.4.b. (1)(d) & DOE G 151.1-3, CE4.3
	Do Exercise Plans clearly identify the roles, responsibilities, and interfaces among exercise participants (i.e., players/responders, controllers, evaluators, and observers)?	DOE G 151.1-3, CE4.4
	Do Exercise Plans clearly identify the provisions for exercise conduct and control?	DOE G 151.1-3, CE4.4
	Do Exercise Plans clearly identify the provisions for exercise evaluation?	DOE G 151.1-3, CE4.4
	Is the scenario in the Exercise Plan consistent with the set of exercise objectives and does it explicitly support an evaluation/validation of each objective?	DOE G 151.1-3, CE4.6
	Are the exercise evaluation criteria used facility/site- or activity-specific, based on existing plans and procedures, and do they correlate with the exercise objectives?	DOE G 151.1-3, CE4.7
	Was the scenario based on an actual or potential emergency or event (or multiple simultaneous events in a disaster) that could occur at the facility/area/site (i.e., was there a proper technical basis for the scenario per the EPHA)?	DOE G 151.1-3, CE4.8
	Is the technical data that supports the scenario (e.g., operational, radiological, chemical, biological, medical, meteorological) accurate and clearly presented?	DOE G 151.1-3, CE4.9

8. EMERGENCY RESPONSE ORGANIZATION (ERO)		
<p><i>Performance Goal: An Emergency Response Organization (ERO), a structured organization with overall responsibility for initial and ongoing emergency response and mitigation, must be established for each facility/site. The ERO must establish effective control at the scene of an event/incident and integrate ERO activities with those of local agencies and organizations that provide onsite response services. An adequate number of experienced and trained personnel, including designated alternates, must be available on demand for timely and effective performance of ERO functions. [DOE O 151.1C, Attachment 2, CRD, 8.]</i></p> <p><u>Objectives:</u></p> <ol style="list-style-type: none"> ERO Organizational Structure [DOE O 151.1C, Attachment 2, CRD, 8.a.] ERO for Hazardous Materials Programs [DOE O 151.1C, Attachment 2, CRD, 8.b.] Control at the Event/Incident Scene [DOE O 151.1C, Attachment 2, CRD, 8.b.] 		
OBJECTIVE 8.1. ERO ORGANIZATIONAL STRUCTURE		
8.1	The contractor at all DOE/NNSA facilities must assign an individual (e.g., building or facility manager or similar position) to manage and control all aspects of the site/facility response.	DOE O 151.1C, Attachment 2, CRD, 8.a.
Criterion		
8.1.1	The organizational structure of the ERO is based on the results of the facility/site or activity Hazards Survey(s) and EPHA(s), the relationships between the site and facility response capabilities, and the relationships between the onsite and offsite emergency response organizations.	DOE G 151.1-4, Ch. 1, 1.3
Lines of Inquiry		Reference(s)
	Is the organizational configuration of the ERO based on actual or potential emergency conditions?	DOE G 151.1-3, App. D, D.4.1, P/E6.1
	Does the management structure of the emergency response facility provide for the collection and dissemination of accurate data, the setting of priorities, assignment of work to functional groups, and keeping key emergency response staff abreast of emergency response status?	DOE G 151.1-3, App. D, D.4.1, P/E6.2
	Does an “Emergency Director (ED)” or equivalent titled individual manage and control all aspects of the facility/site or activity overall response?	DOE G 151.1-3, App. D, D.4.1, P/E6.3
	Does an “Emergency Director (ED)” or equivalent titled individual have the authority to use necessary resources to mitigate the emergency?	DOE G 151.1-3, App. D, D.4.1, P/E6.3
	Does the ED have the authority and responsibility to perform the required functions, including initial activation of on-site response assets, notification of off-site authorities, and request for off-site assistance, in accordance with the National Response Plan (NRP) and the National Incident Management System (NIMS)?	DOE G 151.1-3, App. D, D.4.1, P/E6.4
	Is the division of authority and responsibility between the Incident Commander (IC) and the ED position clearly established and maintained?	DOE G 151.1-3, App. D, D.4.1, P/E6.5
	Is control of operations, monitoring, and repair teams clearly vested in a single ERO position or clearly defined between multiple ERO positions?	DOE G 151.1-3, App. D, D.4.1, P/E6.6
Criterion		
8.1.2	An adequate number of experienced and trained personnel, including designated alternates, are available on demand for timely and effective performance of ERO functions.	DOE G 151.1-3, App. D, D.4.1
Lines of Inquiry		Reference(s)
	Are all personnel who may be needed to perform duties, beyond those specified by 29 CFR 1910.120 for the responder awareness level, during a response to any of a broad range of emergencies defined in the Hazards Survey(s) or EPHA(s) members of the ERO?	DOE G 151.1-3, App. D, D.4.1, P/E6.38

8. EMERGENCY RESPONSE ORGANIZATION (ERO)		
	Are fully trained personnel assigned to facility-and site-level ERO positions to ensure adequate staffing for emergency response?	DOE G 151.1-3, App. D, D.4.1, P/E6.39
	Have all personnel assigned to facility-and site-level ERO positions demonstrated their proficiency in their assigned positions through periodic participation in an exercise, an evaluated drill, or an actual response? Do all primary and alternate personnel accomplish this participation on a rotating basis?	DOE G 151.1-3, App. D, D.4.1, P/E6.40
	Are an adequate number of experienced and trained personnel for initial and ongoing response, including designated alternates, assigned to each functional area?	DOE G 151.1-3, App. D, D.4.1, P/E6.41
	Is a technique, such as duty-cycle or static roster, being used to ensure that qualified personnel are available on-demand and properly assigned?	DOE G 151.1-3, App. D, D.4.1, P/E6.42a.
	Are candidates for call-up, including designated alternates, sufficiently trained for initial and ongoing response?	DOE G 151.1-3, App. D, D.4.1, P/E6.42b.
	Are ERO rosters periodically reviewed for accuracy (e.g., current qualifications, correct phone number, correct response time, etc.)?	DOE G 151.1-3, App. D, D.4, P/E6.42c.
	Are ERO personnel qualifications periodically reviewed and updated?	DOE G 151.1-3, App. D, D.4.1, P/E6.42d.
	Are communication systems that are used to activate both on-shift and off-shift emergency response personnel periodically tested to ensure their adequacy and reliability?	DOE G 151.1-3, App. D, D.4.1, P/E6.43
APPROACH		
Document/Record Review		
	<ul style="list-style-type: none"> • <i>Site/facility emergency plan</i> • <i>Emergency plan implementing procedures</i> • <i>ERO rosters</i> • <i>Training program plan and training records</i> • <i>Exercise program planning documents and records to verify ERO participation/performance in exercises</i> • <i>Emergency Readiness Assurance Plan</i> • <i>Documentation of program reviews</i> • <i>Corrective actions (internal and external) related to ERO</i> 	
Interview		
	<ul style="list-style-type: none"> • <i>Emergency management program administrator</i> • <i>Training program manager</i> • <i>Exercise program manager</i> • <i>ERO personnel</i> 	
Observation		
	<ul style="list-style-type: none"> • <i>Observe conduct of training, drills, and/or exercises</i> 	
OBJECTIVE 8.2. ERO FOR HAZARDOUS MATERIALS PROGRAMS		
8.2	The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish and maintain an ERO for each site/facility with overall responsibility for the initial and ongoing response to and mitigation of an emergency.	DOE O 151.1C, Attachment 2, CRD, 8.b.
Criterion		
8.2.1	The normal operating organization transitions to an ERO immediately after an Operational Emergency (OE) is declared.	DOE G 151.1-4, Ch.1; 1.5.1
Lines of Inquiry		Reference(s)

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