OFFICE OF INDEPENDENT OVERSIGHT AND PERFORMANCE ASSURANCE

EMERGENCY MANAGEMENT OVERSIGHT APPRAISAL PROCESS GUIDE

March 2003

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Preface

The Office of Independent Oversight and Performance Assurance (OA) published the Appraisal Process Protocols to describe the philosophy, scope, and general procedures applicable to all independent oversight appraisal activities. The Office of Emergency Management Oversight (OA-30) prepared this companion volume as part of a continuing effort to enhance the quality and consistency of emergency management oversight appraisals of the Department's comprehensive emergency management system, hereinafter referred to as emergency management. When used in conjunction with the OA Appraisal Process Protocols, this Emergency Management Oversight Appraisal Process Guide provides necessary guidance for conducting emergency management oversight appraisals. It also offers techniques, formats, and sample documents useful in planning for, conducting, and reporting the results of emergency management oversight appraisals.

This process guide describes the general process and principal activities that OA-30 will use for evaluating the effectiveness of both emergency management policies and U.S. Department of Energy (DOE)/National Nuclear Security Administration (NNSA) line management in implementing those policies throughout the Department.

As part of the continuing effort to improve the independent oversight process, OA-30 anticipates making periodic updates and revisions to this process guide in response to changes in DOE program direction and guidance, insights gained from independent oversight activities, and feedback from customers and constituents. Therefore, users of this process guide, as well as other interested parties, are invited to submit comments and recommendations to the Office of Emergency Management Oversight.

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Definitions

Appraisal is an umbrella term referring to any oversight activity conducted by the Office of Independent Oversight and Performance Assurance (OA). Comprehensive inspections, emergency response exercise evaluations, assessments, special studies, and special reviews are all forms of appraisals.

Cognizant Secretarial Officer is the Assistant Secretary/Director responsible for a set of facilities or laboratories (e.g., LLNL, Y-12, TRA at INEEL) within a multi-program field office.

Corrective Action Plan is a document that provides, for each finding or deficiency addressed, planned corrective actions; the responsible individual and organizations; the date of action initiation; key milestones; the date of expected completion of the action; how actions will be tracked to closure; steps to address root causes and generic applicability; and the mechanism for verifying closure and ensuring that such actions are sufficient to prevent recurrence. A corrective action plan may also provide a detailed discussion of longer-term enhancements and upgrades, as well as descriptions of actions taken and compensatory measures already in place.

Emergency Action Levels are criteria used to classify hazardous material operational emergencies. They may be stated in terms of either specific symptoms of safety degradation or the occurrence of a broadly defined event or condition. The term may also be applied to thresholds that identify Departmental emergencies that require further classification.

Emergency Planning includes identification of hazards and threats, development of hazard mitigation, protocol development, development and preparation of emergency plans and procedures, and identification of personnel and resources needed for an effective response.

Emergency Plans document the emergency management program and describe the provisions for response to an Operational Emergency.

Emergency Plan Implementing Procedures describe how emergency plans shall be implemented.

Emergency Preparedness includes acquisition and maintenance of resources, training, drills, and exercises.

Emergency Response includes the application of resources to mitigate consequences to workers, the public, the environment, and national security, and the initiation of recovery from an emergency.

Exit Briefings provide a summary of inspection results to DOE management and the responsible DOE contractor(s). They are normally conducted by the OA team prior to their departure from the inspected facility.

Findings are concise, factual statements of key observations and conclusions about inadequacies identified during an oversight activity that are listed for corrective action.

Hazards Assessment is a quantitative analysis that includes the identification and characterization of hazardous materials specific to a facility/site, analyses of potential accidents or events, and evaluation of potential consequences.

Hazards Survey is a qualitative examination of the events or conditions specific to the facility/site that may require an emergency response.

Lead Program Secretarial Officer is an Assistant Secretary/Director to whom assigned field offices directly report and who has overall ownership responsibility for the field offices.

Operational Emergency is when events or conditions require time-urgent response from outside the immediate/affected site/facility or area of the incident. Such events or conditions cause, or have the potential to cause, serious health and safety impacts to workers or the public, serious detrimental effects on the environment, direct harm to people or the environment as a result of degradation of security or safeguards conditions, or loss of control over hazardous materials.

Mitigation is the action(s) necessary to recover, to the greatest extent possible, from adverse effects of an incident, or measures that are in place or taken to wholly or partially compensate for weaknesses in program implementation.

Performance Tests evaluate all or selected portions of emergency management programs as they exist at the time of the test.

Program Secretarial Officer is an Assistant Secretary/Director funding work at a particular site or lab via a "customer" relationship with the field element.

Protective Action Criteria are predetermined levels, expressed in terms of doses, exposures, or concentrations, at which steps to protect the public and workers should be taken.

Readiness Assurance includes assessments and documentation to ensure that stated emergency capabilities are sufficient to implement emergency plans.

Recovery includes planning for and actions taken following termination of the emergency to return the facility/operations to normal.

Significant Vulnerability is a deficiency that presents an unacceptable, immediate risk to workers, the public, the environment, or national security.

Trusted Agent is a representative of the organization being evaluated who is assigned to assist in planning a performance test and procuring the necessary facilities or personnel. The Trusted Agent has full organizational decision-making authority in matters concerning performance test scenario and conduct procedures. He/she is privy to the full scenario and all other test plans, and is required to verify, on behalf of his/her organization, the plausibility and fairness of the scenario and test plan. Trusted Agents may also be required in specific technical areas to provide information necessary to the development of a scenario. In such cases, those Trusted Agents are privy only to that scenario information necessary for them to provide meaningful information.

Validation is the process by which OA ensures the factual accuracy of collected data and ensures that identified deficiencies, and their impacts, are effectively communicated to responsible managers and organizations.

Section 1

INTRODUCTION

Contents

Vision

The vision of the Office of Emergency Management Oversight (OA-30), within the Office of Independent Oversight and Performance Assurance (OA), is to stimulate qualitative improvements in U.S. Department of Energy (DOE) emergency management programs by providing the Secretary of Energy and other senior managers with independent, objective, accurate, timely, and credible information regarding the effectiveness of emergency management programs and by identifying potentially useful and effective program improvements.

Mission

The mission of OA-30 is to establish and execute a program of independent evaluations and assessments focused on the DOE emergency management system and on sites, operations, and transportation activities with significant quantities of special nuclear material and other hazards. In so doing, OA-30 provides value to senior management and promotes continuous improvement by ensuring that DOE senior management has an accurate picture of overall effectiveness for DOE emergency management policy and program implementation and by

Table 1-1. Office of Emergency Management Oversight Program Requirements and Mandates

- Maintain awareness of the status of findings and associated corrective actions identified during appraisals.
- Communicate the status of emergency management policies, programs, and implementation to DOE managers in various written products (e.g., appraisal reports, special study reports, follow-up review reports, and input for annual reports).
- Conduct independent oversight of DOE emergency management policies, procedures, standards, and guidelines, and oversee the adequacy of their implementation throughout the DOE complex.
- Maintain a program for corrective action follow-up consistent with the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 98 and DOE Order 470.2B.

performing effective independent oversight that promotes effective emergency management programs. The results of these independent evaluations are provided to the Secretary of Energy; to senior management responsible for program policy, guidance, and implementation; and to others as may be directed. OA-30's program requirements and mandates are listed in Table 1-1.

Organization

The Emergency Management Oversight program is managed by the OA-30 Director, who is responsible for program management, execution, administration, and human resource activities for assigned staff. OA-30 is part of the broader activity under the OA Director, who reports directly to the Secretary of Energy. This reporting framework provides programmatic independence from DOE elements that have line and/or program management responsibilities for emergency management programs and policy.

About This Guide

This Emergency Management Oversight Appraisal Process Guide is a companion publication to the OA Appraisal Process Protocols. While the OA Appraisal Process Protocols provide general guidance common to all OA appraisal activities, this OA-30 Guide provides additional detail and guidance specific to emergency management oversight appraisals conducted by OA-30. OA-30 evaluation team members should maintain familiarity with both documents. To minimize unnecessary redundancy between the two guides, this document sometimes refers to sections in the OA Appraisal Process Protocols.

Scope of Emergency Management Oversight Appraisals

OA-30 activities are designed to satisfy its mission requirements. Its oversight function is "independent" from the Department's line program offices (line management) in that the office has no responsibility for operations or programs, policy development, or technical support to line managers, and does not receive guidance or direction from line managers below the Secretarial level.

The emergency management oversight program includes a number of activities, collectively referred to as appraisals, related to evaluating DOE/National Nuclear Security Administration (NNSA) policy and DOE/NNSA and contractor line management performance in the areas under its purview. OA-30 conducts the following types of appraisals:

- **Program reviews** are conducted by OA-30 to assess the adequacy of DOE policies and the effectiveness of policy implementation by Headquarters and line organizations. OA-30 program reviews are scheduled activities that may include, but are not limited to, the following key elements of emergency management:
  - Hazards surveys and hazards assessments
  - Emergency response organization
  - Offsite response interfaces
  - Categorization and classifications of operational emergencies
  - Notifications and communications
  - Consequence assessment
  - Protective actions and reentry
  - Emergency medical support
  - Emergency public information
  - Emergency facilities and equipment
  - Termination and recovery
  - Program administration, including emergency plans
  - Emergency readiness assurance plans, including feedback and improvement
  - Training and drills
  - Development and conduct of exercises
- **Emergency response exercise evaluations** are special inspections conducted by OA-30 to determine how effectively the DOE and contractor emergency response organizations have prepared for and can respond to a simulated hazardous materials accident. Exercise evaluations include the response and recovery actions of sites/facilities and DOE emergency operations centers; interfaces with Federal, state, and local agencies and Departmental

entities (e.g., field/operations office or program office); and the Department's emergency response assets.

- **Follow-up reviews** are conducted to determine the status and progress of corrective actions and other activities being taken in response to deficiencies previously identified in OA-30 appraisals. Ratings are normally assigned as a result of OA-30 follow-up reviews.

- **Program status reviews** are non-rated evaluation activities used to determine the condition of one or more program elements or attributes for the purpose of providing feedback to the site regarding areas within the emergency management program that need further attention.

- **Special studies** are performed as required to address an area, concern, or issue within the emergency management program. They may focus on the status of a specific program element, the adequacy of specific policies, or the implementation status of specific policies throughout DOE. They may also address areas outside emergency management that affect the program.

- **Special reviews** are conducted at the request of the Secretary or other senior DOE managers, sometimes on a "rapid response" basis, to provide specific needed information about emergency management or other critical Departmental functions. OA-30 is not routinely called upon to perform special reviews; however, the Office provides personnel and other resources when necessary.

A validated report is published for each appraisal, findings are identified, and program performance is normally rated according to the OA rating system described in Section 5 of this guide. When appropriate, needed improvements are identified. Proposed corrective actions are reviewed for adequacy, and findings and associated corrective actions are tracked for subsequent follow-up.

Subordinate Procedures

This Appraisal Process Guide describes OA-30's general process and principal activities for evaluating the effectiveness of emergency management policies, and DOE line management in implementing those policies, throughout the Department. OA-30 has developed inspectors guides to provide further guidance for conducting emergency management program reviews and emergency management tabletop performance tests.

The **inspectors guides** adopt DOE Guide 151.1, *Emergency Management Guide*, draft Volume VI, Section 2, "Evaluation Criteria for Hazardous Material Programs," and incorporate OA-30's experience. These performance-based evaluation criteria provide a standard for evaluating the planning, implementation, and effectiveness of Departmental emergency management programs. To supplement the evaluation criteria from the draft guide, additional guidance was developed based on experience and lessons learned from prior emergency management appraisals, including effective appraisal methods and common deficiencies found for each program element. The inspectors guides are organized by program elements, enabling OA-30 to develop and implement them individually. They will be updated as necessary to incorporate experience and lessons learned from OA-30 appraisals.

The **Emergency Management Tabletop Performance Test Inspectors Guide** is used to assess the effectiveness of selected emergency response personnel and emergency response functional organizations in responding to postulated events. This guide provides the methodology that the evaluator uses to develop and conduct an emergency scenario to test the proficiency of the responder and the adequacy of response procedures and job aids in selected emergency response elements, such as event categorization and classification. Scenario development, use of trusted agents, briefings to the individual being evaluated, and guidelines for conduct are discussed. Topics also include the extent of simulation and confidentiality considerations.

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Section 2

APPROACH TO EMERGENCY MANAGEMENT OVERSIGHT

Contents

Introduction

The emergency management oversight program provides a disciplined and consistent process for monitoring, evaluating, and reporting the status of emergency management programs in the Department. The process has been developed and refined over time and tested through repeated use; the remainder of this guide describes the essential elements of that process, all of which are closely tied to established emergency management oversight appraisal goals.

Appraisal Goals

Emergency management oversight program goals are to:

- Determine whether DOE policies and policy guidance for emergency management are effective.
- Determine whether emergency management programs meet the requirements established by DOE policy and whether the programs are effective.
- Assess the impact of any identified deficiencies, taking into account mitigating factors, compensatory measures, and current or planned corrective actions.
- Determine the status of actions relative to previously identified deficiencies.
- Present potential enhancements for consideration for strengthening the program or addressing identified deficiencies.

Appraisal Philosophy

The OA oversight philosophy that guides Office-wide appraisal efforts is stated in Section 2 of the OA Appraisal Process Protocols. OA-30 applies that philosophy to the emergency management oversight appraisal process.

Roles and Responsibilities

Responsibilities for implementing the emergency management oversight program reside within OA and OA-30. Table 2-1 lists typical roles and responsibilities for OA-30 appraisals.

Office of Independent Oversight and Performance Assurance (OA)

The Office Director and staff provide strategic direction, quality management, coordination, and information management for the overall independent oversight program, including the emergency management oversight program.

Table 2-1. Typical OA-30 Evaluation Team Roles and Responsibilities
Director, Office of Emergency Management Oversight • Oversees implementation of the OA emergency management (EM) appraisal program • Provides overall direction and guidance • Establishes appraisal schedules • Interfaces with Headquarters and field personnel to coordinate activities and address concerns • Serves as Inspection Team Leader for environment, safety, and health (ES&H) and emergency management inspections when designated by the OA Director • Makes EM appraisal team assignments and establishes review scope • Participates on the Quality Review Board • Briefs senior DOE management and other stakeholders on appraisal results
Deputy Director, Office of Emergency Management Oversight • Provides direction and guidance consistent with the OA-30 Director • Recommends appraisal schedules • Serves as Inspection Team Leader for ES&H and emergency management inspections when designated by the OA Director • Supports the OA-30 Director in interfacing with Headquarters and field personnel to coordinate activities and address concerns • Recommends appraisal team structure and scope • Participates on the Quality Review Board, as requested • Briefs senior DOE management and other stakeholders on appraisal results
Team Leader • Leads appraisals of ES&H and EM inspections • Provides input on the recommended appraisal scope • Provides direction and guidance to team members on the approach to specific appraisal activities • Develops the ES&H and EM portion of the inspection plan • Provides feedback on the proposed appraisal team structure and makes recommendations for additional resources needed to accomplish the scope • Makes arrangements with the site for document requests and other logistics, as needed • Establishes the schedule of events for ES&H and EM appraisals and makes specific assignments • Ensures that team members perform their assigned duties • Addresses site concerns associated with appraisal activities • Provides feedback to site personnel on a daily basis to validate assessment information, and clearly communicates areas of concern • Prepares and presents appraisal reports • Briefs site management and counterparts on appraisal results
Topic Team Leader • Supports the Team Leader in leading appraisals for EM • Provides input on the recommended appraisal scope • Provides direction and guidance to team members on the approach used to conduct performance testing and other Inspection activities • Provides input to the Team Leader on document requests and other necessary logistics to support the topic team • Provides feedback on the proposed EM appraisal team structure and makes recommendations for additional resources needed to accomplish the scope • Assures that assignments and schedules are conducive to implementing the plan • Ensures that topic team members perform their assigned duties

Table 2-1. Typical OA-30 Evaluation Team Roles and Responsibilities (continued)

Topic Team Leader (continued)
- Addresses site concerns associated with activities
- Provides feedback to site personnel on a daily basis to validate assessment information, and clearly communicates areas of concern
- Prepares and presents EM sections of appraisal reports
- Participates in briefing site management and counterparts on appraisal results

Team Members
- Supports the Team Leader and Topic Team Leader in conducting appraisals
- Provides input to the Team Leader and Topic Team Leader on appraisal scope and potential approaches
- Conducts appraisal activities following the direction and guidance of the Team Leader or Topic Team Leader
- Prepares the schedule of interviews to accomplish during the onsite visit
- Reviews key site documents prior to the onsite visit
- Conducts thorough and fair appraisals
- Validates assessment data and conclusions with site personnel on a daily basis to ensure factual accuracy
- Provides written input for draft appraisal reports as directed by the Team Leader and Topic Team Leader
- Participates in site validation meetings with counterparts and site management, as directed

Office of Emergency Management Oversight (OA-30)

The Office of Emergency Management Oversight conducts appraisals of DOE emergency management programs. OA-30 responsibilities include:

- Performing periodic appraisals of emergency management programs at DOE sites having significant amounts of special nuclear materials or other hazards
- Performing periodic appraisals of the DOE Headquarters emergency management system
- Evaluating DOE policies related to emergency management
- Performing follow-up reviews to ensure that corrective actions are effective
- Performing complex-wide studies of emergency management issues
- Developing recommendations and identifying opportunities for improving emergency management performance
- Reviewing other governmental and commercial emergency management programs to provide benchmarks for DOE performance
- Providing feedback to the Office of Emergency Operations regarding the results of its evaluations
- Communicating with and responding to state and local stakeholder input
- Apprising the Defense Nuclear Facilities Safety Board (DNFSB) of OA-30 activities and issues, as directed
- Providing resources, as necessary, to participate in special reviews.

Note: During most inspections, OA-30 will be part of the overall inspection team with OA-50. On these joint inspection teams there will be an overall Team Leader and a Topic Team Leader for emergency management. When OA-30 is performing reviews and OA-50 is not part of the inspection team, the Team Leader and Topic Team Leader are the same.

Team Leader

The Team Leader is responsible for leading and managing the environment, safety, and health (ES&H) and emergency management appraisal teams' efforts in their conduct of the evaluation activities, analysis of observations and results, and ratings of the program elements. The leader ensures that the scope of the appraisal is accomplished and that the results are reported accurately and in a timely manner. The Team Leader keeps OA management, as well as site senior management, informed of the team's progress throughout the evaluation.

Topic Team Leader

The Topic Team Leader supports the Team Leader, as necessary, during the appraisal. The Topic Team Leader is responsible for leading and managing the emergency management appraisal teams' efforts in their conduct of the evaluation activities, analysis of observations and results, and ratings of the program elements. The Topic Team Leader ensures that the scope of the appraisal is accomplished and that the results are reported accurately and in a timely manner. The Topic Team Leader keeps the Team Leader and OA-30 Director, as well as site management, informed of the team's progress throughout the evaluation.

Team Members

Each team member evaluates the effectiveness of policies and implementation of assigned emergency management program elements. They are responsible for focusing individual data collection activities, developing lines of inquiry, conducting performance tests and daily validations, briefing the team leaders, and writing assigned appraisal report sections.

Professional Conduct and Relations with Site and Headquarters Personnel

The OA guidelines for professional conduct and relations with site and Headquarters personnel are stated in Section 2 of the OA Appraisal Process Protocols. OA-30 endorses those views and applies the guidelines to the emergency management oversight appraisal process. Guidelines for team member conduct are summarized in Table 2-2. A more complete list of guidelines is contained in the OA Appraisal Process Protocols.

Major Phases of Appraisals

OA-30 appraisal activities may be characterized by the four functional phases into which they are organized: planning, conduct, closure, and follow-up.

The **planning** phase includes those activities necessary to prepare for all aspects of an appraisal. The **conduct** phase includes that portion of the appraisal principally devoted to collecting and validating data. The **closure** phase involves data integration and analysis, issue identification, development of findings, rating determination (if applicable), draft report preparation and quality review, and management briefings. The **follow-up** phase includes site review, comment resolution, and final report preparation. For some activities, the follow-up phase also includes Headquarters briefings, corrective action plan reviews, and corrective action tracking.

Table 2-2. Guidelines for Team Member Conduct

- As official representatives of Headquarters, team members' behavior should always be beyond reproach.
- Be tactful, courteous, and properly attired.
- While on site, comply with all local rules and regulations.
- Avoid criticizing the site or site personnel.
- Avoid adversarial relationships.
- Be sensitive to the pressures and stress experienced by the people being evaluated.
- Establish good relationships with site personnel.
- Do not become involved in actions that could lead to sexual harassment, or charges of sexual harassment.
- Develop positive, professional relationships with points of contact.

Although these phases are identified by the primary activities they encompass, the actual activities in each phase may overlap significantly. For example, some data is collected during the planning phase, and planning (particularly for emergency exercise evaluations and/or tabletop performance tests) can extend into the conduct phase. Similarly, analysis begins during data collection and continues throughout the process. Subsequent sections of this guide describe the activities and expectations associated with these major appraisal phases.

Classified Information

OA-30 team personnel are not often expected to handle classified documents or sensitive unclassified information during the course of appraisals. When necessary, the Team Leader will provide for appropriate site-specific guidance and instructions to the team on these matters. For example, the Team Leader may ask that the site's classification officer provide a briefing on topic areas that may contain classified matter. In addition, team members may need to discuss proposed report section outlines with the site's classification officer before writing the report. This should help identify any potential classified areas prior to report preparation.

Identification of Requirements and Guidance

DOE Order 470.2B, *Independent Oversight and Performance Assurance Program*, establishes the overall process supporting the emergency management oversight program and includes the requirements and responsibilities for conducting, reporting, and responding to OA appraisals.

DOE Order 151.1A, *Comprehensive Emergency Management System*, describes the Department's emergency management system (EMS). This order establishes policy; assigns roles and responsibilities; and provides the framework for the development, coordination, control, and direction of the DOE EMS commensurate with the hazards at sites and activities. The order also establishes requirements for emergency planning, preparedness, response, recovery, and readiness assurance activities and describes the approach for effectively integrating these activities under a comprehensive, all-emergency concept. DOE facilities/sites or activities, operations/field offices, and DOE Headquarters offices are required to develop emergency management programs as elements of an integrated and comprehensive EMS. Together, these elements ensure that the DOE EMS is prepared to respond promptly, efficiently, and effectively to any emergency involving DOE facilities/sites, activities, or operations, in order to protect workers, the public, the environment, and national security.

The Emergency Management Guide (DOE Guide 151.1) provides non-mandatory guidance for implementing the requirements pertaining to the DOE comprehensive EMS. This guide applies to all DOE facilities/sites, activities, and operations and to all DOE organizational levels (facility/site, operations/field office, and Headquarters offices). Emphasis is placed on guidance for the Operational Emergency programs at facilities/sites. If the site does not use the methodologies contained in the Emergency Management Guide, the site must demonstrate that its alternate approach provides an equivalent level of protection for site workers and the public.

In addition to the order and guides specific to emergency management, additional requirements can be found in directives related to other programs, such as:

- DOE Order 225.1A, *Accident Investigation*
- DOE Order 232.1A, *Occurrence Reporting and Processing of Operations Information*
- DOE Order 420.1A, *Facility Safety*
- DOE Manual 435.1-1 Chg 1, *Radioactive Waste Management Manual*
- DOE Guide 440.1-4, *Contractor Occupational Medical Program Guide For Use With DOE Order 440.1*
- DOE Guide 450.4-1B, *Integrated Safety Management System Guide*

- DOE Order 452.2B, *Safety of Nuclear Explosives Operations*
- DOE Guide 452.2A-1A, *Implementation Guide for DOE Order 452.2A, Safety of Nuclear Explosives Operations*
- DOE Order 452.4A, *Security and Control of Nuclear Explosives and Nuclear Weapons*
- DOE Order 460.2-1, *Departmental Materials Transportation and Packaging Management*
- DOE Order 5530.1A, *Accident Response Group*
- DOE Order 5530.2, *Nuclear Emergency Search Team*
- DOE Order 5530.3 Chg 1, *Radiological Assistance Program.*

Section 3

PLANNING

Contents

Introduction

Planning within OA-30 is a long-range and continuous process, involving a myriad of activities and essentially all staff members. This guide deals only with those aspects of planning that are most directly associated with conducting appraisals. Thorough planning is the foundation of all appraisals. Even routine and repetitive appraisals require the gathering and analysis of large amounts of information from many sources, decision-making based on that analysis, and appraisal preparations based on those decisions. The quality of planning significantly affects all other appraisal phases. Because there are limited amounts of time and other resources available for planning, planning efforts must be focused and efficient.

Regardless of the nature of the appraisal—inspection, study, or other—and regardless of the size of the team involved or whether the appraisal is office-specific or a combined inspection involving multiple OA offices, the same planning process is applicable; the planning requirements may vary in magnitude for different activities, but the essential elements of planning will not vary.

This section outlines the OA-30 planning process for appraisals and the general distribution of planning responsibilities. Table 3-1 summarizes the major planning events.

Planning Goal

The goal of planning in OA-30 is to anticipate and successfully prepare for every action necessary to meet mission requirements and conduct the highest quality appraisals possible with the available resources.

Strategic Planning, Program Planning, and Scheduling

Strategic planning is the responsibility of the OA Director and the OA-30 Director. Strategic planning involves taking a long-range view of evolving emergency management issues and adjusting the organization's processes and capabilities to meet future needs. Each year OA-30 prepares a program plan outlining the activities it will take to implement its program. The program plan identifies overall program objectives, near-term objectives, activity scheduling considerations, and planned appraisal activities for the calendar year. Development of the program plan, which is the responsibility of the OA-30 Director, facilitates the planning and implementation of office activities for the year. It is recognized that priority changes may occur as a result of world or national events, DNFSB focus issues, or mission changes within DOE. OA-30 plans and schedules will be revised accordingly, and as directed.

Table 3-1. Major Planning Events

Planning

- Review facility information.
- Identify potential problem areas and inspection focus areas.
- Develop and submit document request lists.
- Coordinate logistics requirements.
- Identify proposed appraisal team members.
- Identify points of contact.

Planning Meeting

- Site brief to team/brief team on planning results.
- Review and analyze documents.
- Refine topic focus.
- Integrate planning efforts.
- Conduct discussions with operations office and Facility Representatives.
- Coordinate and develop performance tests and safety plans with Trusted Agent.
- Select samples of documents, interviewees, and performance tests.
- Brief OA management.

Conducting the Inspection

- Revise plans, as necessary.

Management Planning

Management planning responsibilities are continuous throughout an appraisal's cycle. Most of the early planning requirements are management responsibilities (as opposed to team planning responsibilities.) Once an appraisal has been approved and tentatively scheduled, the Team Leader, in conjunction with the Director of OA-30, will be responsible for planning activities, which may include:

- Contacting the affected sites and organizations to begin ongoing coordination
- Identifying and collecting documents and other information that will be needed for more detailed planning
- Conducting an initial review of available information to facilitate initial decisions regarding activity scope and focus
- Determining the tentative scope and focus of the appraisal
- Developing and coordinating a site visit schedule with the site(s)/organizations(s) to be visited
- Identifying and acquiring the personnel resources to accomplish both the technical and administrative support aspects of the appraisal
- Identifying and satisfying logistics needs, such as onsite workspace, hotel accommodations, computer and other equipment support, and visit requests/badging
- Directing and overseeing team planning activities at team planning meeting(s) or site planning visit(s)
- Overseeing necessary ongoing planning throughout the course of the appraisal.

Appendix B, Appraisal Planning and Implementation Checklist, is a tool that the Team Leader may use to assist in the appraisal planning process. Management planning activities, with appropriate input from the results of early team

planning activities, are used to create a formal plan for the conduct of the appraisal. As planning is continuous throughout an appraisal, so too is the formal plan a "living document," subject to modification as the activity progresses.

Site Notification of Scoping Visit and Data Collection and Analysis Visit

For planned emergency management appraisals, OA management typically arranges dates and schedules for the onsite visits with the appropriate operations or field office. OA sends a formal notification to DOE/NNSA line management (i.e., the lead cognizant secretarial officer or NNSA deputy administrator and the cognizant line manager) of the schedule of the scoping and data collection and analysis visits. The notification or the scoping memorandum may include a formal request for selected documents related to emergency management systems, plans, and processes.

Scoping Visit

The site scoping visit (optional) helps focus the evaluation early in the planning process. Evaluation team management and selected technical specialists conduct the scoping visit several weeks before the evaluation visit. The purposes of the scoping visit are summarized in Table 3-2.

When performed, the scoping visit typically lasts three days. Before the visit, the Team Leader in coordination with the site prepares a schedule of activities for the scoping visit. During the OA-30 preparation and planning phase of the evaluation, a scoping visit may also be scheduled with the Headquarters cognizant secretarial office.

Team Structure

The OA Director assigns the Inspection Team Leader. For combined inspections, the OA-30 Director assigns a Topic Team Leader. The emergency management oversight team structure greatly depends on the size and complexity of the appraisal. Elements common to most appraisal teams are discussed below.

The Team Leader (a senior manager or senior professional of OA-30) assembles a team with the requisite experience to conduct the appraisal. The team members from OA-30 and the independent consultants are professionals who possess technical and appraisal expertise in their assigned field.

Table 3-2. Purposes of the Scoping Visit

- Understand the DOE/NNSA and contractor organizational structure and approach to management
- Obtain site documents
- Tour facilities
- Identify focus areas for the evaluation
- Identify the potential need for reviews by an authorized classifier
- Identify and obtain information from stakeholders
- Identify DOE/NNSA and contractor points of contact or counterparts (site and Headquarters)
- Convey the purpose, preliminary scope, and approach for the evaluation
- Develop a follow-up document request list
- Establish the scope of the evaluation
- Coordinate logistical arrangements

The typical team organization is designed to promote a single, integrated team effort. All team members and coordinators work together to pass along information and issues of mutual interest. This team organization is intended to facilitate the management of the team and the rollup of information, not to limit or impede access to the Team Leader or other team members by individual evaluators. Team members are encouraged to keep each other informed of important issues or common lines of inquiry. For example, an evaluator may find a problem in the classification of Operational Emergencies that is caused by inadequate training. This information should be passed on to other team members who are evaluating different key emergency management elements. Doing so may expose a larger, more pervasive problem in emergency management training programs. Team members should not assume that they are to function only within their key element or technical area. Rather, they should work together across disciplines and areas of expertise to share information, request assistance, and follow up on lines of inquiry. The appraisal and the resulting report is a compilation of the team's efforts, not of any single individual.

The Team Leader manages the planning efforts, assigns evaluation tasks, and coordinates the data collection activities of the appraisal team. The Team Leader is responsible for the rollup of issues and programmatic weaknesses developed by the team members for use in the preparation of assigned sections of the evaluation report.

An administrative support coordinator who oversees the administrative and logistical support required by the team supports the appraisal team. The coordinator serves as the point of contact for onsite support.

Team Selection

Appropriate team members must be selected to evaluate the key emergency management program elements selected for review. The final team composition cannot be set until the areas to be evaluated have been determined during the planning efforts. However, the Team Leader, Topic Team Leader (if applicable), and administrative support coordinator are selected at the start of planning, when tentative scope determinations have been made. Also, certain management and technical specialists may be assigned to the team from the outset based on the known mission and major facilities at the site to be evaluated. This initial group works together during planning to identify not only the scope of the evaluation but also the personnel to conduct evaluations in the areas within the scope.

As planning for the appraisal progresses, the OA-30 Team Leader refines the scope and focus of the appraisal and may also amend the team roster to reflect these changes. Team members may be asked to accept additional assignments, new team members may be added to address particular technical areas, and team members may be dropped as the planning process progresses. The OA-30 Director and Team Leaders structure the team as they see fit to meet the needs of the appraisal activity.

Appraisal Plan

A final evaluation plan is developed as soon as possible following the scoping visit (if performed), although preliminary work often begins before the scoping visit. The goal is to provide the evaluation plan to the site at least one week in advance of the data collection and analysis portion of the evaluation. Appraisal team management develops the evaluation plan, which reflects the evaluation objectives and focus areas. The evaluation plan is approved by the Director of OA-30 (and other office directors, as necessary, for combined inspections) and transmitted by cover memo from OA-1 to the site contractor and DOE/NNSA site office / service center, operations office (as applicable), program office, and the Office of Emergency Operations. Team members then use the plan to develop more detailed data collection plans containing specific lines of inquiry and data collection techniques. A typical outline for an evaluation plan is shown in Table 3-3.

Table 3-3. Typical Evaluation Plan Contents
• Introduction • Inspection Schedule • Inspection Approach • Team Responsibilities and Assignments • Inspection Process • Scope of the Inspection • Inspection Criteria and Activities

Team Planning

Team planning refers to planning efforts that begin once the evaluation team is selected and assembled and the first team planning meeting is held. Team planning activities concentrate on determining appropriate data collection techniques; completing detailed data collection plans that will effectively lay out the framework for data collection and analysis during the evaluation; and focusing and redirecting evaluation activities based on continuing analysis of information.

Planning occurs at several different levels within the team, including team management planning, team planning for the management and technical specialists in their focus areas, and individual planning. While planning within the team will concentrate on different activities, it is still imperative that team members coordinate activities with each other to address selected facilities, maintain focus, and promote efficient use of team resources.

The planning meeting is usually conducted at Headquarters but may be held elsewhere, depending upon the nature and needs of the specific appraisal.

The team planning meeting is the first meeting involving the entire team. It serves to kick off team planning and to orient the team on the process. Planning is typically conducted within three weeks prior to the site visit. It is important to bring the team together early and get individuals working in a team environment. The purposes of the team planning meeting are summarized in Table 3-4. During this period, team members review available site documents to better focus their data collection plans. This should enable them to use the limited time available more efficiently while on site.

Table 3-4. Purposes of the Team Planning Meeting
• Brief on the results of previous management planning activities, including the objectives and proposed parameters of the appraisal, and any management guidance and expectations. • Review and analyze available documentation. • Discuss key facilities at the site. • Schedule or plan preliminary interviews with DOE/NNSA field element and facility managers, the program office, and the Office of Emergency Operations. • Identify stakeholders. • Coordinate appropriate information exchanges with representatives from Headquarters and the field. • Recommend any modifications to activity scope and focus resulting from planning activities. • Determine appropriate data collection methods and develop detailed data collection plans, including any necessary performance test plans, safety plans, etc. • Develop a schedule of data collection and related activities. • Identify additional information and support requirements, and communicate them to the appropriate individuals or organizations. • Brief or otherwise inform managers of planned activities. • Coordinate logistics and travel plans.

While much of the detailed planning for an appraisal should be accomplished at the planning meeting(s), planning is an ongoing effort and may continue well into the conduct phase of the activity. Both managers and team members are expected to remain flexible and ready to adapt plans to respond to unexpected circumstances that may arise during any phase of an appraisal.

Team Communications

Effective, frequent communication is one of the most important keys for a successful evaluation. This includes communication among team members and between the team, OA management, line management, and external stakeholders. The team's communications with external stakeholders are extremely important to the evaluation, as the stakeholders are involved during various phases of the review. The Team Leader works with the OA outreach manager to develop an outreach strategy appropriate to meeting the appraisal objectives for the site. The strategy might include contacting citizen advisory boards or regulating agencies in communities in the vicinity of the site to explain the team's mission and the objectives of the appraisal, and to obtain any community input that will assist OA in the appraisal of the emergency management program. The strategy may also include distributing the final report to external stakeholders.

Several different types of meetings and briefings are necessary to maintain team communications during the evaluation. Effective communications within the team cannot be limited to formal meetings or written internal status reports. Team members must exchange information as needed to produce a consistent, integrated evaluation. Typical forums for such communication are ad hoc, face-to-face meetings, telephone conversations, and even conversation over lunch or in the car while riding to the site.

Planning for Management and Technical Specialist Activities

Management and technical specialists are tasked with measuring the effectiveness of the emergency management programs by evaluating facilities, programs, and technical functional and focus areas (see Section 1). As will be discussed in Section 4, observations—walkdowns at primary facilities and performance observations (including previously scheduled training and drills)—are extremely valuable methods of gathering data. To maximize use of these methods, team members need to plan their data-gathering activities so that these observations can be dovetailed with more-easily scheduled data collection activities, such as document reviews of programs and procedures, as well as interviews with facility-level DOE and contractor management and workers. The result of team member planning is a preliminary schedule of onsite data collection activities, an individual evaluation plan, and identification of additional documents for onsite review.

Headquarters Interviews

The data collection process begins at Headquarters during the team planning phase before shifting to the site. During team planning, team members should conduct preliminary interviews with responsible Headquarters management and staff personnel, retrieve Headquarters documents, and conduct other data collection activities.

Summary

Planning occurs throughout the appraisal process and results in the products shown in Table 3-5. Efficient and thorough planning activities result in the team having the necessary plans and resources to accomplish an accurate evaluation of line management's implementation of the emergency management program.

Table 3-5 Products of Planning

- Identification of focus areas
- Document request lists
- Team roster and structure
- Inspection plan
- Individual data collection plans
- Individual schedules for onsite activities

Section 4

APPRAISAL CONDUCT

Contents

Introduction

The conduct phase of an appraisal normally encompasses that period when the majority of the needed data is collected. This may consist of a concentrated effort during a relatively short period of time, as during an exercise evaluation, or it may occur over an extended period, as in some special studies. For some types of appraisals, team members may not be located at the subject site. The conduct phase is tailored to the unique needs and objectives of each specific appraisal. This stage is crucial to the success of an appraisal because it is during this stage that team members collect most of the information upon which they will base their analyses, conclusions, ratings, and recommendations, when appropriate.

Goal

The goal of conducting an appraisal is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

Scope

Data collection activities generally follow the plans and schedules developed during the formal planning process. Team members normally focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, early data collection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Problems or potential problems that become apparent during the course of data collection should not be ignored simply because they were not included in formal planning.

Data Collection Methods

Since data are critical to a successful appraisal, it is essential to collect sufficient amounts of accurate, pertinent data, which requires appropriate data collection methods. There are four basic methods of data collection available to team members: document reviews, interviews, observations, and performance tests. Since each of these methods has inherent strengths and limitations, the specific methods employed must be carefully selected and used in combination with each other to ensure that all necessary data are collected and cross-checked.

Document Reviews

Line management usually relies on detailed documentation, such as policies, plans, and procedures, as well as self-assessment activities, to ensure that programs are properly implemented and administered. Document reviews can provide the team with information about the consistency of written policies and procedures with DOE requirements (an indication of how the program is intended to operate) and may suggest weaknesses that need further exploration. Where possible, requests for needed documents should be made early enough so that team members can use them in planning their onsite activities. Team members

should limit the initial document request to only those documents that are not available to them electronically and that are essential to their planning and preparation effort. (See Appendix C for a sample Document Request List.)

The team may request that certain documentation be made available prior to the site scoping visit or at the site for use when data collection begins. Document reviews often continue throughout data collection as team members request additional documents to develop a more complete understanding of programs and how they function. Requests for additional documents are directed to the appropriate point of contact or counterpart.

The documents of most interest are usually policy documents on how programs are designed to function; written program plans and procedural documents; self-assessments; and other records that may indicate whether programs are implemented as required or designed.

Table 4-1 lists documents typically reviewed during the course of an OA-30 appraisal.

Interviews

Interviews can provide useful data that is not readily available from other data collection methods. Interviews are most effective in determining perceptions and individual understanding of policies, procedures, duties, and management expectations. While both formal and informal interview techniques may be employed, deliberate preparation is necessary before any interview. Table 4-2 lists protocols to assist in the conduct of interviews.

Individual interview schedules should be coordinated to minimize impact on site personnel and should note interviews with senior managers for Team Leader participation.

Table 4-1. Typical Documents Reviewed

Analyses
- Hazards surveys
- Hazards assessments
- Consequence analyses
- Safety analysis reports
- Environmental impact statements

Plans
- Emergency plans
- Emergency Readiness Assurance Plan
- Emergency public information
- Training plans
- Corrective action plans
- Emergency response organization rosters

Procedures
- Emergency plan implementing procedures
- Emergency response procedures for support disciplines, such as health physics

Records
- Training
- Drill and exercise packages
- Hazardous material inventories
- System tests
- Incident and occurrence reports

Other
- Memoranda of agreement
- Mutual aid agreements
- DNFSB reports
- Emergency response organization rosters
- Lead Program Secretarial Office/ Cognizant Secretarial Office field assessments
- DOE/NNSA operations office and/or site office assessments
- Office of Emergency Operations assistance visit reports
- Office of Emergency Operations “no notice” exercise reports
- Corrective Action Tracking System database reports
- Organization charts

Table 4-2. Interview Protocols

- Prepare questions and lines of inquiry in advance.
- Ensure prompt attendance at scheduled interviews.
- Do not "lead" interviewees in answers and conclusions.
- Typically, conduct interviews in the interviewees' work location to promote easy access to applicable documents.
- Interview attendance:
  - Limit attendance to one or two interviewers.
  - Limit attendance by line personnel to the interviewee unless the interviewee requests the attendance of a manager or union representative.
  - Request attendees not to respond to questions asked of the interviewee but to provide only advice and support to the interviewee.
  - To ensure an open and candid interview and exchange of information, requests from individuals, including managers, to attend interviews will not normally be entertained unless requested by the interviewee.
- Explain the purpose of the interview.
- Pace questions to allow full response and avoid a "third degree" atmosphere, particularly when multiple interviewers are involved.
- Question tactfully, listen sensitively, observe thoughtfully, and evaluate accurately.
- Take good interview notes. Do not rely on memory.
- Summarize the interview at the end to assure that interviewer conclusions and interviewee concerns are appropriately captured.

Observations

Physical examination by the team member is often the most reliable data collection technique. Observing operations may be not only desirable but also necessary for an accurate evaluation in situations where specific, observable operations are critical to effective performance.

Observations allow team members to see how site personnel actually do their jobs and to evaluate how they perform their duties under various conditions. For example, observing personnel monitoring or operating equipment provides valid data on whether site personnel follow established procedures and whether they operate the equipment properly. Before observing someone executing a procedure, the team member should thoroughly review and understand the procedure to establish a baseline for the observation. During observations, team members must not interfere with ongoing activities, manipulate equipment or controls, or access components (such as electrical cabinets), and they must comply with all applicable radiological, security, and safety requirements. Team members should ensure that talking to or asking questions of operators, craft workers, etc., during ongoing activities will not unduly distract the workers or disrupt their activities. Table 4-3 lists typical activities observed during the course of an OA-30 appraisal.

Table 4-3. Typical Performance Observations

- Annual facility/site exercises
- Training sessions
- Emergency equipment condition
- Tabletop performance tests
- Facility walkthroughs
- Drills
- Surveying, sampling, and sample analysis
- Responder briefings
- Control of exercises
- Exercise critiques

Performance Tests

Performance testing is one of the most valuable data collection methods available to OA-30 appraisal team members and is a preferred method for inspection-related activities. Performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether systems and equipment are functional and appropriate. Virtually any skill, duty, procedure, system, or item of equipment can be performance tested. Performance tests may vary in complexity from simple to complicated. The Emergency Response Tabletop Performance Test Inspectors Guide developed by OA-30 provides detailed information and tools to assist inspectors assigned to evaluate the capabilities and performance of emergency management programs in DOE. Before OA-30 conducts any performance test, all test activities must be appropriately coordinated with site representatives or other responsible individuals or organizations.

OA-30 uses emergency response exercise evaluations to identify both strengths and deficiencies in the response of the emergency management program elements to a simulated emergency event. Emergency exercise evaluations are performance tests designed to validate all elements of an emergency management program. Program effectiveness is judged based on an observed and evaluated demonstration of response and recovery capabilities. They include observations of activities involving the emergency response organization (ERO) staff and their utilization of facilities, equipment, and procedures, as well as the overall conduct and control of the exercise, based on exercise documentation, including the scenario and objectives.

Tabletop performance tests are used to assess the performance of selected emergency response personnel, typically incident commanders or other initial decision-making personnel, to a postulated event that requires an immediate site response. These walkthroughs are particularly useful when ERO readiness needs to be evaluated, but the assessment visit does not coincide with a scheduled site exercise or drill. The assigned evaluator develops an emergency scenario that is designed to test the proficiency of the responder in selected emergency response elements, such as event categorization and classification. The evaluator uses a site-designated Trusted Agent as a subject matter expert on site protocols, plans, procedures, and terminology to validate the scenario and the appropriate response. To begin the walkthrough, the individual being evaluated is briefed on its purpose, and guidelines for its conduct are discussed using a standardized list of topics, such as extent of simulation and confidentiality considerations. The examinee is then provided the initial conditions and assumptions, as well as all information and response tools they would normally have available under the stated circumstances. Upon scenario initiation, the evaluator observes the decision-maker's actions and notes the documentation used to support those actions. These performance tests are administered to a sample of the qualified responders using the same or a similar scenario, to ensure that any conclusions regarding responder readiness and proficiency are valid.

ERO functional groups, such as the consequence assessment team, may also be evaluated utilizing the tabletop methodology to assess the team's effectiveness in responding to events.

Other Methods

While the four basic data collection methods are specified above, OA-30 personnel are not limited to these basic methods as described. Different or hybrid methods may be used, and personnel are encouraged to employ the best techniques available for a specific task.

Communications and Integration

Since various team members collect data during virtually all appraisals, it is important that all appropriate information is shared among team members in a timely manner. Information collected by one team member may have a direct impact on a line of investigation being conducted by another. When teams are large (as in the case of an exercise evaluation or a combined

inspection) and each is focusing on a different area or discipline, a conscious and deliberate effort at information integration is required. Specific methods for achieving integration vary from formal to informal, may be dictated somewhat by the team size and type of activity involved, and may include team meetings, shared data collection notes, and daily reports to managers. A daily report summarizing the progress of the appraisal and significant emerging emergency management issues is typically provided by the Team Leader to the OA-30 Director, who may forward it to OA-1, as appropriate.

Daily reports are used for sharing information among team members and for documenting the course of an appraisal at interim steps. The primary goal of these reports is to assist in the integration of information gathered by individual team members. However, daily reports also provide additional documentation of the process by which appraisal findings are derived and serve as an archival system to provide a historical account of pertinent appraisal activities by OA. Refer to Section 7, Records Management, for more information. Other specific methods employed by a team to achieve integration are left to the discretion of the responsible activity manager.

When potentially serious deficiencies are identified during an appraisal—particularly an inspection—they must be brought to the attention of the Team Leader, the responsible organization's managers, and OA-30 senior management as soon as possible. After enough data is collected to be reasonably sure that a significant deficiency exists, it should be identified, formally communicated to the responsible site managers, and discussed in sufficient detail to ensure that it is understood. For particularly complex issues, communication of the team's concern can be aided by formal documentation and transmittal using the optional Significant Vulnerability Form (Appendix D) that has been designed for this purpose. This is part of the validation process discussed below. Such deficiencies may or may not ultimately result in formal findings or policy issues, depending on the individual circumstances.

The Director of OA-30 will provide routine updates of significant deficiencies to OA-1. DOE Order 470.2B, *Independent Oversight and Performance Assurance Program*, contains additional specific requirements for notifications and response to significant vulnerabilities.

Validation

Validation is the process OA-30 uses to verify the accuracy of the information obtained during data collection activities. It is a critical element in the conduct of all appraisals. This section provides an overview of the process used to validate data and the draft report.

Data Validation Strategy

The validation strategy provides site personnel with multiple opportunities to verify the factual accuracy of data and information collected by team members at various stages of the actual appraisal process. In using any of the validation methods, team members must be very open about issues in order to provide those being evaluated with a chance to respond. These interactions often are of significant value to the site because they provide a means for OA-30 to share perspective gained from other sites in the complex. Three key elements of the strategy are:

Site counterparts. Each team member is assigned one or more site points of contact or counterparts, both DOE and/or contractor, designated by the site as a result of the scoping visit (Section 3). These counterparts are knowledgeable of the program element being evaluated by the team member. Team members and counterparts interact on a regular basis to ensure communication of findings, both positive and negative. Counterparts provide feedback to team members on the factual accuracy of information obtained; they recommend additional personnel to interview, as well as documentation to review for additional perspective on an issue. Additionally, team members informally discuss and review substantive issues with their counterparts on material they will draft into reports. This allows for the quick resolution of areas of disagreement and identification of potential inaccuracies as soon as possible. In

addition, validation of results in meetings at the end of each day, or the following morning, between team members and counterparts provides further confirmation that results are valid and allows less room for misunderstanding.

On-the-spot validations. Site personnel and team members should also summarize key observations and concerns at the conclusion of interviews, walkthroughs, and observations of work performance to ensure a shared understanding of the facts observed by the team member. An on-the-spot validation immediately after an interview or a performance observation, for example, can help resolve any differences of opinion quickly and promote concurrence on important interview or observation points.

Continual interaction of Team Leaders and site managers. Team Leaders provide a daily "debrief" to site managers that includes both the positive and negative observations from the previous day's evaluation activities, as well as emerging issues. For example, the Team Leader usually meets with site senior line managers each morning to brief them on the status of the evaluation, important issues, and critical needs. The Team Leader may also call upon selected team members to attend. This daily meeting helps site management track the progress of evaluation activities and compare information provided by the site counterparts. The daily debrief allows site management to identify areas of disagreement quickly and to work with the OA-30 team to correct factual accuracy problems. In many cases, site management is informed of issues that need management attention. At the mid- and endpoint of the onsite data collection period, these daily meetings are used to provide a preliminary rollup of team results and a description of issues that are being developed by the team. In addition, if a draft report is not to be provided to the site prior to the team's departure, an informal presentation of tentative results is conducted at the end of the onsite visit. DOE, operations office, and site senior management, as well as site points of contact, are expected to participate.

As appropriate, a summary validation may be conducted to involve site managers early in the validation process and provide more information on one or more topics than they would otherwise get in the exit briefing. For a summary validation, one or more team members provide a verbal presentation of key observations, findings, and conclusions to a group of counterparts and interested managers.

Team members also work together to compare the information they have collected during various stages of the appraisal process. This interaction increases the value of evidentiary information with validation by multiple sources. Team members should understand that each type of data and information has its limitations and should be used accordingly, and that the information presented for validation must be as thorough, accurate, and concise as possible. Finally, it is essential that conflicts in data and information are resolved as soon as possible, between team members or between team members and site personnel.

Report Validation Strategy

Reports from the OA-30 appraisal are provided to site personnel for review of factual accuracy at key stages in appraisal report generation. This provides the site personnel and management with a number of opportunities to communicate concerns about factual accuracy to the team. The report validation process is as follows:

- Provide the draft evaluation report to the site.
- Conduct informal pre-validation meetings between team members and counterparts regarding the content and conclusions of the draft report. These small group meetings are extremely useful for detailed discussion of the issues, correcting factual accuracy problems, and getting "buy-in" at the working level for the need to address the identified problems.
- Conduct a formal validation with key DOE/contractor counterparts. The formal meeting is conducted approximately 24 hours after the site receives the draft evaluation report. Roundtable discussions are held with site management and counterparts on their

concerns about the facts or conclusions presented in the report. Headquarters line managers may also attend the formal validation; this is especially important for issues that Headquarters organizations are primarily responsible for addressing. These sessions are also used to further explain issues, and they have been very effective in promoting buy-in with site management. Any issues related to DOE policy should be validated with the Office of Emergency Operations. After review, comments from formal validation are incorporated into the final draft report as appropriate, and it is then provided to the site.

- Provide the final draft report to the site and allow 10 working days for their detailed review. The site is encouraged to provide line management (Cognizant Secretarial Office) with specific written comments on any factual inaccuracies or other concerns.

Keys to Successful Validation

Some key items for successful validation are provided in Table 4-4.

Table 4-4. Keys to Successful Validation

- Candid and frequent communications with line management (Cognizant Secretarial Office and operations office) and site points of contact
- Effective communication of issues and findings to counterparts and site managers
- Adequate development of issues, findings or conclusions, including performance examples to assure validity, understanding, and acceptance by line management
- Communication of emerging issues, findings, and supporting examples to assure that all information is provided and that the issue is understood and valid
- Opportunities for review at various stages of report generation
- Sharing issues and findings with Headquarters line management or sharing policy issues with the Office of Emergency Operations

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Section 5

APPRAISAL CLOSURE

Contents

Introduction

The closure phase of an appraisal normally takes place after data collection is essentially complete (although at times, closure activities may identify additional data needs). Data must be organized, assimilated, and analyzed in order to form conclusions and report the results. This section discusses the various tasks to be accomplished during the closure phase, including data analysis, determination of findings, assignment of ratings (if appropriate), report preparation, identification of policy issues, and others.

Goals

The main goals of this phase are to thoroughly analyze all available data, draw valid conclusions from that analysis, and based on the analysis and conclusions, prepare a report that accurately reflects the status of the program(s) being examined and provides appropriate managers the information they need.

Integration

The information integration discussed in the previous section continues to be important during the closure phase. During data analysis, all pertinent information, regardless of who collected it, should be considered in the effort to reach valid conclusions. Raw data, conclusions, and other results of analysis should be shared, as appropriate, among team members.

Analysis of Results

Appendix A, Standards and Criteria Memorandum, contains information provided to the field to clarify what measures OA-30 uses to evaluate emergency management programs and assess the readiness of site emergency response organizations to respond to potential emergencies. The examples in the memorandum reflect the types of program and performance deficiencies that have been repeatedly identified by OA at multiple sites across the DOE complex. Each example indicates the types of weaknesses being identified by OA and concludes with an indication of how those weaknesses adversely impact an emergency response program. The examples also serve as models for the analysis of program and performance weaknesses throughout the appraisal.

While analysis is an ongoing process during all phases of an appraisal, it culminates during the closure phase. Analysis involves a critical review of all data collection results, particularly identified program strengths and weaknesses, and

leads to logical, supportable conclusions regarding how well the program functions and satisfies the intent of DOE policy.

Analysis begins informally through daily team discussions about the observations and results of data collection. As data collection activities are completed, the results are incorporated into templates and worksheets to help guide the team member through a preliminary data analysis.

All team members work in concert to emphasize the need to continually identify underlying causes of flaws or deficiencies in emergency management systems, program design, and/or implementation. Each specialist needs to know the details (who, what, when, where, how, and why) of the subject being evaluated to gain a full understanding of the supporting systems and how they function. Frequent and open communication with other team members is the key to identifying and "rolling up" information and issues to determine their impact.

While data analysis occurs throughout an evaluation, it begins in earnest during the first onsite data collection and analysis visit. Before the team begins to write a report, the members must clearly identify the strengths, weaknesses, and mitigating conditions and must integrate the results and issues.

The analysis leads to logical and supportable conclusions about the effectiveness of the programs being evaluated and how well the status of the programs satisfies the intent of DOE policy. Analysis should always lead to a conclusion regarding the site's ability to both mitigate the consequences of incidents and protect site workers and the public. Any deficiencies must be addressed for their importance and impact at the site. Deficiencies are analyzed both individually and collectively; they are balanced against strengths and mitigating factors to estimate their overall impact on the performance of line management.

If there are no deficiencies, analysis is a relatively simple matter. If there are negative issues, weaknesses, deficiencies, or standards that are not fully met, these must be considered individually and collectively and then balanced against any strengths or mitigating factors to determine the overall impact on the program's effectiveness. Factors that should be considered during analysis include:

- Whether the deficiency is isolated or systemic
- Whether program managers and other line managers knew of the deficiency, and if so, what actions were taken
- The importance or significance of the standard affected by the deficiency
- Mitigating factors, such as the effectiveness of other programs or program elements that may compensate for the deficiency
- The deficiency's actual or potential effect on mission performance or accomplishment
- The magnitude and significance of the actual or potential deficiency to the DOE, site, workers, public, and environment.

The analysis must result in—and support—conclusions regarding how successfully the program being evaluated meets requirements.

Findings

One product of analysis in certain types of appraisals (e.g., inspections and follow-up reviews) is the identification of findings. Findings are used to indicate significant deficiencies that merit managers' priority attention. Team members are responsible for determining which inspection results are designated as findings; findings usually identify aspects of a program that do not meet the intent of DOE policy, Federal or state laws, or other applicable requirements. Section 5 of the OA Appraisal Process Protocols discusses findings in more detail.

Explanation of Rating System

OA-30 assigns ratings to the supporting elements of a facility's emergency management

program. The conclusions reached through analysis of inspection results lead to the assignment of ratings. The teams are responsible for assigning the ratings; however, the Director of OA has established a quality control process to ensure that the assigned ratings are supported by the analysis and conclusions drawn by the team.

The rating process involves the critical consideration of all evaluation results, particularly the identified strengths and weaknesses. In the case of weaknesses, their importance and impact are analyzed both individually and collectively, and balanced against any strengths and mitigating factors to determine their impact on the overall goal of protection of site workers and the public.

OA uses three rating categories: ***Effective Performance***, ***Needs Improvement***, and ***Significant Weakness***, which are also depicted by colors as green, yellow, and red, respectively.

An emergency management element being evaluated would normally be rated Effective Performance if the emergency management function is implemented effectively. An element would also normally be rated Effective Performance if, for any applicable standards that are not met, other compensatory factors exist that provide equivalent protection to the site workers and the public, or the impact is minimal and does not significantly degrade the response. Line managers would be expected to address any identified weakness.

An emergency management element being evaluated would normally be rated Needs Improvement if one or more applicable standards are not met and are only partially compensated for by other measures, and the resulting weakness in the emergency management function degrades the ability of the emergency responders to protect site workers and the public. Line managers would be expected to significantly increase their attention on the identified areas of weakness.

An emergency management element being evaluated would normally be rated Significant Weakness if one or more applicable standards are not met and there are no compensating factors, and the resulting deficiencies in the emergency management function seriously degrade the ability of the emergency responders to protect site workers and the public. Line managers would be expected to apply immediate attention, focus, and resources to the deficient program areas.

Policy Issues

Periodically during appraisals, issues arise or deficiencies are observed that stem from policy weaknesses—lack of policy, lack of clarity in policy, ambiguous or contradictory policies, inappropriate policy, or inappropriate implementation guidance. When such an issue arises, OA-30 will document the issue and submit it to the Headquarters element responsible for the policy in question (typically the Office of Emergency Operations). The point may be documented in the appraisal report or in a separate written policy issue paper that identifies the subject, provides necessary background information, states the problem, discusses its implications, and, if appropriate, recommends a course of action.

Report Preparation

A report is issued as the formal product of any appraisal. Reports are the only published records of specific appraisals, and are intended for dissemination to the Secretary and appropriate managers at DOE Headquarters and field elements (including, when appropriate, facility contractors). Reports for various types of appraisals may vary in format; the most appropriate format for the specific purpose will be used. Appendix C of the OA-1 Appraisal Process Protocols provides guidance for preparing the portions of appraisal reports that are targeted at senior management. OA-30 reports are typically prepared using the format shown in Table 5-1. For all independent oversight activities, report preparation activities share a common process:

- An **initial draft** report is prepared by the team.

- The initial draft is reviewed by a **Quality Review Board** (QRB) to ensure that it is readable and logical, and that it contains adequate, balanced information to support conclusions (and, if appropriate, ratings). The QRB may require revisions to the report.

- After review by the QRB and tentative approval by the Director of OA, the initial draft may be provided to appropriate line organizations for a factual accuracy review. For inspections, a copy of the initial draft report is provided to the responsible DOE/NNSA field element and the representative of the Cognizant Secretarial Office (CSO) or NNSA Deputy Administrator, if on site, who are allowed a limited time (typically less than one day) to provide verbal and written comments regarding factual accuracy. All comments are reviewed and appropriate changes are made to the draft report.

- The **final draft** report is provided to the DOE/NNSA field element (at the completion of the onsite validation period), and a copy is provided to the CSO or NNSA Deputy Administrator and the Director of Emergency Operations. The DOE/NNSA field element and CSO or NNSA Deputy Administrator have 10 working days to comment on the final draft report. This review ensures that the report contains sufficient detail, is factually accurate, and serves as a tool for improving performance. The review is not intended to allow the reviewers to eliminate conclusions, findings, or ratings that show the site or office in an unfavorable light.

Quality Review Board

Following development and internal quality reviews of the draft evaluation report by the OA-30 appraisal team management and technical specialists, a formal review and critique of the draft report is conducted by the QRB. The QRB is appointed by the Director of OA and is chaired by the Deputy Director of OA. Membership includes at least two senior advisors and the OA-30 Director. QRB membership can be adjusted based on special needs. The QRB provides a corporate-level review of the draft report developed by the evaluation team to ensure that it accurately, fairly, and objectively reflects the results, conclusions, findings, recommendations, and ratings of the evaluation.

Briefings

The closure process for appraisals often includes a requirement to brief appropriate managers on the progress, results, and conclusions of the activity. Briefings fall into two main categories: internal and external.

Internal briefings apprise OA managers and staff of the status of an ongoing activity, providing information necessary to keep them informed of results and issues so that they can provide necessary direction and guidance.

External briefings apprise managers outside of OA—normally managers of organizations undergoing an appraisal—of the results and conclusions of an appraisal activity. OA-30 typically provides an exit briefing to managers of inspected organizations before departing a site. The exit briefing, normally scheduled for the morning of the last day on site, generally includes summaries of the status of each key program element inspected—including major strengths and weaknesses—and of the overall emergency management program, and the ratings assigned to each. OA-30 may also conduct additional briefings at Headquarters, as discussed in Section 6.

The need for briefings associated with other (non-inspection) types of appraisals will depend upon the specific nature of such activities. The structure, level of detail, and specific content of briefings is tailored to the needs of the audience and the specific information that needs to be communicated.

Table 5-1. Sample Emergency Management Oversight Annotated Outline

TABLE OF CONTENTS
ACRONYMS (optional)

1.0 INTRODUCTION
An overview identifies the organizations responsible for site missions, activities, and management. The key part of this section is the scope or the description of the focus areas of the appraisal, including the more detailed description of organizations evaluated. The introduction also includes a concise summary of the background and conclusions of the inspection.

2.0 RESULTS
This section describes significant positive attributes and weaknesses of the site's emergency management program in meeting the objectives of DOE's comprehensive emergency management system.

3.0 CONCLUSIONS
This section presents an overall perspective on the current state of the emergency management program for the site/facility.

4.0 RATINGS
This section identifies the ratings assigned to each program element evaluated.

APPENDIX A: SUPPLEMENTAL INFORMATION
This appendix identifies the structure and composition of the appraisal team and team management.

APPENDIX B: FINDINGS FOR CORRECTIVE ACTION AND FOLLOW-UP
This appendix summarizes the significant findings identified during the appraisal. Findings identified in this appendix are formally tracked in accordance with DOE Order 470.2B, *Independent Oversight and Performance Assurance Program.*

APPENDICES C-F: PROGRAM ELEMENT DETAILS
These appendices detail the results of the reviews of individual emergency management program elements. Each appendix contains an introduction, status, and results that detail key observations and findings (as appropriate), a conclusion, program element ratings, and opportunities for improvement.

Process Improvement

OA-30 consistently strives to improve its internal processes as part of its continuing effort to improve its products and the value they provide to the Department. During the closure phase of each major appraisal, and typically before the team leaves the site, Team Leaders meet with the team members to identify any lessons learned in conducting the appraisal. Team members may also provide written comments to the Team Leader as to how the appraisal process could be improved. The Team Leader submits a written lessons-learned report to the OA-30 Director, identifying both positive and negative aspects of the appraisal and any recommendations for improving the appraisal process. Recommended improvements should address any necessary revisions to the Emergency Management Oversight Appraisal Process Guide. The OA-30 Director then communicates lessons learned via memo to OA management.

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Section 6

APPRAISAL FOLLOW-UP

Contents

Introduction

Upon completion of onsite appraisal activities, a number of tasks remain to close out an appraisal. These include conducting any necessary briefings, preparing and issuing a final appraisal report, assessing corrective action plans, submitting any policy issue papers, and preparing to follow the progress of corrective actions.

Goals

The primary goals of the follow-up phase are to prepare and disseminate an accurate account of the appraisal results through a final report and appropriate briefings; review proposed corrective actions for adequacy; and provide policy issue papers to the senior managers of appropriate Headquarters organizations.

Headquarters Briefings

Upon returning to Headquarters, OA-30 develops a one-page summary of appraisal results for submittal to the OA-30 Director (see sample one-page summary in Appendix C). The one-page summary must be validated with site personnel to ensure factual accuracy. The purpose of the one-page summary is to communicate the results of the appraisal to senior DOE managers, including the Secretary, Deputy Secretary, Under Secretary, and/or the Administrator for the NNSA. Upon request, the OA-30 Director or Team Leader may be required to brief these senior managers on the one-page summary. Other senior Headquarters managers may be included at the discretion of the senior official being briefed.

After each inspection, the OA outreach manager coordinates with the CSO and the Office of the Secretary to develop an approach for providing results to external stakeholders, including any needed briefings. Such briefings to external stakeholders do not normally take place until after the final report is issued; OA's responsibility is to provide the briefing on the inspection results.

Policy Issue Papers

Upon returning to Headquarters and before the report is finalized, OA-30 completes, if necessary, any policy issue papers and provides them to the manager(s) of the appropriate Headquarters organization(s). OA-30 then responds, as needed, to requests for discussions or for additional information pertinent to the issue(s) raised.

Final Report

The CSO and the DOE/NNSA field element have 10 working days from their receipt of the final draft report to provide OA-30 with their consolidated comments regarding its factual accuracy. OA-30 then considers the comments,

holds consultations between managers and the appropriate staff members, and determines the OA-30 action on each response.

OA-30 publishes the final report 10 working days after receipt of the consolidated comments. The final report is distributed to the Office of the Secretary, the Office of Emergency Operations, the CSO, the NNSA Deputy Administrator, and the DOE/NNSA field element. OA-30 makes further distribution of the final report as directed by the Director of OA.

Corrective Action Plans

Protocols for corrective action plan development, review, comment, and approval are contained in DOE Order 470.2B, *Independent Oversight and Performance Assurance Program.* The major elements are summarized below.

Line management has 10 working days to notify the CSO and OA of actions taken or compensatory measures planned for any emergency deficiencies that present an unacceptable immediate risk to workers, the public, the environment, or national security.

The Cognizant Line Manager, with approval of the CSO, must develop and implement corrective actions to address the findings in the appraisal report. Within 30 calendar days of the issuance of the final report, the responsible organization provides OA-30 and the CSO with an **interim corrective action plan** addressing, in detail, ongoing and planned corrective actions for each deficiency identified in the final report. OA-30 reviews and comments on the interim corrective action plan within 15 calendar days of receipt and provides a copy to the CSO. Within 60 calendar days of the issuance of the final report, the responsible organization will issue a **final corrective action plan** approved by the CSO. Final corrective action plans should address, in detail, all completed, ongoing, and long-term actions associated with each finding in the report.

Within 30 calendar days, the appropriate OA-30 personnel then review the final corrective action plan and provide comments and their bases to the responsible organization and CSO.

Corrective Actions and Follow-up

After the final report has been distributed, OA-30 forwards report data and findings, if any, to the Assistant Secretary for Environment, Safety and Health (EH), who then enters this information into the Corrective Action Tracking System database. In accordance with DOE Order 470.2B, the responsible organization is charged with entering and updating corrective actions in the Corrective Action Tracking System. Additionally, DOE Order 470.2B requires OA to conduct follow-up reviews, on a selected basis, of appraisal findings to verify and validate the effectiveness of line management's corrective actions and to confirm closure of findings. OA-30 monitors the progress of and validates corrective actions through subsequent appraisals and follow-up reviews.

SECTION 7

RECORDS MANAGEMENT

Contents

Introduction

During the appraisal process, it is important to promote the integration of information gathered by individual team members so that each member may benefit from the efforts of the others. Upon completion of the onsite appraisal activities, it is incumbent upon the appraisal team to gather and archive the interim notes, reports, and other team documentation that was generated while conducting the appraisal. Information that documents the team's activities and thought processes during the appraisal should be gathered and archived. This provides a historical record of the process by which appraisal findings were derived.

Goals

The primary goals of appraisal records management are twofold. First, it maintains a retrievable archive of appraisal team documentation that allows team members to share information during the appraisal process. Second, it allows OA to reconstruct the activities and thought processes by which a team arrived at its findings during the appraisal process.

Record Keeping

Each member of an OA-30 appraisal team has a role in documenting assessment activities. This includes 1) developing planning documents; 2) documenting interviews and other site assessment activities; 3) retaining records of important documents that were reviewed; 4) recording performance results; and 5) reflecting assessment conclusions in appraisal reports. The OA-30 Team Leader/Topic Team Leader is responsible for ensuring that key appraisal information is captured and retained. As a general rule, OA-30 will not retain classified information; rather, reference will be made to the classified information that was reviewed on site. The OA-30 Team Leader/Topic Team Leader is responsible for determining what site documentation is relevant to the conclusions developed from the appraisal. All appraisal documentation that is retained will be for internal use only, except as authorized by the OA-30 Director. Specific information that should be retained from an inspection includes:

- Inspection plan
- Correspondence
- Daily reports (via Lotus Notes Inspection Database)
- Schedules of interviews (as recorded in individual daily reports)
- Observations/supporting evidence (as recorded in individual daily reports)
- Records of key documents that were reviewed as part of the appraisal (as recorded in daily reports)
- Significant Vulnerability forms
- Final draft of report provided to the site for comments

- Site factual accuracy comments on final reports and validation

- Final report.

Daily Reports

Daily reports are considered to be a key information management tool for OA-30 appraisal teams. All appraisal team members are required to document their activities in daily reports using the Lotus Notes Database and the associated report template. Information documented in the daily report should include records of meetings, interviews, walkdowns, and key document reviews; observations and/or supporting evidence; and difficulties encountered.

It is important that team members provide sufficient information to support the records management goals of the OA appraisal process. All team members will receive an orientation on the proper use of the Lotus Notes Database to document their activities. Furthermore, at the end of each appraisal, the OA-30 Team Leader will ensure that each team member has completed his/her daily report file in Lotus Notes.

At the end of each appraisal, the Team Leader or OA-30 administrative person will make an electronic file of the daily report files and any other supporting data (i.e., correspondence, Inspection Plans, corrective action plans [CAPs], and site documents) determined necessary. This electronic record, along with any other pertinent archival documentation, shall be maintained in the OA file for the subject appraisal report. These records shall be maintained for 10 years.

APPENDIX A

STANDARDS AND CRITERIA MEMORANDUM

March 23, 2000

MEMORANDUM FOR: DISTRIBUTION

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Standards and Criteria for Evaluating DOE Emergency Management Programs

The Office of Independent Oversight and Performance Assurance (OA) has recently been receiving feedback from DOE Headquarters and field elements concerning the standards and criteria used by this office to conduct emergency management oversight evaluations. The purpose of this memorandum and the information provided in the attachment is to clarify what measures are used by OA to evaluate emergency management programs and assess the readiness of site emergency response organizations to respond to potential emergencies. The information presented herein is consistent with the OA-1 and OA-30 Appraisal Process Protocols and the evaluation plans that are provided to sites before an independent oversight evaluation is conducted.

The requirements promulgated in DOE Order 151.1, *Comprehensive Emergency Management System*, are intentionally non-prescriptive due to the wide variety of operations and activities conducted by DOE and its contractors, and the broad range of hazards associated with these operations/activities. The Order requires that site and/or facility emergency management programs be developed commensurate with the hazards present at that particular site/facility. To assist sites and facilities in implementing the Order requirements, DOE has established a comprehensive emergency management guide. Although the direction provided in the guide is not mandatory, it provides needed clarification regarding the intent of the DOE Order 151.1 requirements. The level of detail and the numerous examples presented in the guide make it an ideal "road map" for implementing a comprehensive and effective site emergency management program or for determining whether equivalent implementation approaches meet the intent of the Order requirements.

The draft Volume VI of the guide, *Emergency Management Evaluations*, contains a generic set of performance evaluation criteria for appraising programs and exercises for responding to emergencies involving hazardous materials. Rather than duplicating this information or creating a different set of performance standards, OA relies on the evaluation criteria in this guide to perform its evaluations. Although this volume of the guide is in draft form, it has been available to DOE Headquarters and field elements in various forms since 1992 and in its current form since June 1999. The attachment to this memorandum provides some specific examples of how OA uses this information to evaluate the adequacy of a program element or attribute that may be addressed only generically in the Order. OA also assigns higher priority to some program attributes than others. This prioritization process is essentially the same as that reflected in section 1.2.5 of Volume VI. That section describes a process for characterizing findings based on whether a finding directly or indirectly impacts the associated emergency management activity. The information provided in the attached examples is not intended to convey guidance as requirements. It is intended to illustrate that a failure to consider the information contained in the guide may result in incomplete or ineffective program implementation. The ultimate conclusion regarding the adequacy of program implementation or exercise performance depends on whether these elements

provide reasonable assurance that workers, the public, and the environment will be protected from the consequences of an emergency based on the hazards present at the site or facility.

During the most recent emergency management evaluations, OA has focused on three particular areas: (1) the adequacy of site and facility hazards surveys and assessments as a foundation for all other emergency management program elements, including categorization and classification, notifications and communications, and protective actions; (2) the ability of emergency responders to mount an effective emergency response based upon their training, expertise, and use of site-specific response procedures, particularly within the first hour of an event; and (3) the use of training, drill, and exercise results, responses to actual events, and internal and external assessments as mechanisms for continuous program and performance improvement. The examples provided in the attachment generally reflect these focus areas. One of the methods that OA uses to evaluate the intended outcome of site emergency response plans and procedures is through performance-based testing, which is also promoted by Volume VI of the guide. These testing activities provide information regarding the ability of emergency responders to implement response actions quickly and accurately based on their training and using established site response "tools." These performance tests are planned and conducted with the aid of a site "trusted agent" who can then validate or refute the findings of OA evaluators that are based on observed performance.

Additional information regarding OA emergency management evaluation methods will be forthcoming and will be provided in conjunction with the issuance of a follow-up report on the status of emergency management programs in the DOE complex. If you have any questions regarding this information, please contact me at (301) 903-3777 or Chuck Lewis, Director, Office of Emergency Management Oversight, at (301) 903-1554.

Glenn S. Podonsky, Director
Office of Independent Oversight
and Performance Assurance

Attachment

Example Applications of DOE Generic Performance-Based Evaluation Criteria to DOE Order 151.1 Requirements

The purpose of this attachment is to provide examples of how the Office of Emergency Management Oversight (OA-30) within the Office of Independent Oversight and Performance Assurance (OA) uses the generic performance-based evaluation criteria contained in the draft Emergency Management Guide (EMG) Volume VI, *Emergency Management Evaluations*, to evaluate site emergency management programs. The examples are intended to illustrate that, because of the non-prescriptive nature of the DOE Order 151.1 requirements, in many cases it is necessary to consult the emergency management guide to fully understand the purpose and intent of the Order requirements and to help in defining the graded approach for a particular site program.

Each example identifies the basic program element being evaluated and the text of the Order pertaining to that element that would be under examination. The example then provides some relevant excerpts (that are not intended to be all inclusive) from the EMG that aid in understanding the intent of the Order requirement, and selected performance criteria from Volume VI that could be used to evaluate whether the requirement has been implemented effectively.

The examples that are provided are generally reflective of the types of program and performance deficiencies that have been repeatedly identified by OA at multiple sites across the DOE complex. Each example indicates the types of weaknesses being identified by OA and concludes with an indication of how those weaknesses adversely impact an emergency response program. Volume VI of the guide also provides a methodology for determining whether a finding directly impacts, contributes to a direct impact, or indirectly impacts the successful accomplishment of a particular emergency management activity. This determination is critical to establishing the relative importance of the finding and for prioritizing corrective actions.

Each example contains the following information:

Program Element: Identifies the basic emergency management program element addressed by the example. The example does not address all requirements pertaining to that element.

Repeated OA Observations: Provides a general overview of the types of program weaknesses identified during OA emergency management evaluations.

DOE Order 151.1 Requirements: Identifies the provisions of DOE Order 151.1 that are applicable to the program element in the example. Although the text provided in this section does not provide all of the Order references to the program element, it is intended to reflect the core of the program element requirements.

Selected Volume VI Evaluation Criteria: Provides a selected subset of evaluation criteria from Volume VI of the guide that could be used to evaluate the requirements identified. Some of the evaluation criteria listed for a particular example may come from the sets of criteria listed for other program elements.

Affected Outcome: Provides an indication of the impact that failing to implement the requirements of the Order and the provisions of the emergency management guide can have on a site's emergency response capability. The type of program impact (direct, contributing to direct, or indirect), which reflects the severity of a finding as described in Volume VI, is also provided.

Program Element: Hazards Assessments (HAs) EXAMPLE 1

Repeated OA Observations: Hazards assessments do not address the full range of potential emergency scenarios. For example, many sites have not quantitatively analyzed transportation events or malevolent acts as part of the hazards assessment process. Most sites also have not established a process to review the hazards assessment prior to significant changes in hazardous material inventories or facility operations. As a result, many hazards assessments are not based on current inventories of hazardous material.

DOE Order 151.1 Requirements:

For hazardous materials in quantities exceeding the thresholds identified in paragraph 1 of chapter IV of the Order, "The release of or loss of control of hazardous materials (radiological and non-radiological) shall be quantitatively analyzed."

"The hazards assessment shall be reviewed at least annually and updated prior to significant changes to the site/facility or hazardous material inventories."

DOE Guide Volume II, Section 3:

"Accident initiators should include causes such as corrosion, manufacturing defects, malfunctioning equipment or control systems, and procedural or human error. External causes that should be considered include impacts of natural phenomena, accidents at nearby facilities, and vehicle or aircraft crashes. High-probability, low-consequence events need to be addressed in facility emergency plans because of their potential impacts on workers in the affected facility and those nearby. Both malevolent acts and 'severe' events should be included in the Hazards Assessment because they represent the upper end of the consequence spectrum, for which prompt recognition and response may be essential to mitigation of both the event and its health and safety consequences."

Selected Volume VI Evaluation Criteria:

P1.11: "A spectrum of potential emergency event/condition scenarios are analyzed in the Hazards Assessment, including all applicable categories of initiating events, such as internal accidents and events, external events, and malevolent acts."

P1.11 c.: "The spectrum of scenarios analyzed includes a broad range of events covering high-probability, low-consequence through low-probability, high-consequence beyond-design-basis events."

P1.8 b.: "Onsite transportation HAs describe the type and quantity of material transported, containers, routes, speeds, and controls exercised."

P1.9: "The hazards assessment is a current, accurate quantitative compilation of hazardous material inventories or maximum quantities associated with a facility."

P1.9 a.: "Reliable and comprehensive methods of hazardous materials identification are used to provide an accurate representation of materials associated with the facility (e.g., walkthroughs, shipping records, local chemical inventory systems)."

P1.9 b.: "Implemented procedures ensure that emergency planners are notified of significant changes in facility inventories, processes, or activities that may affect results of documented hazards assessments."

Affected Outcome: Incident commanders and emergency managers do not have a complete and accurate set of emergency action levels for categorizing and classifying events that can or have caused a hazardous material release at a site. As identified in one of the Volume VI examples, failure to consider or analyze a spectrum of potential emergency events or conditions has a *direct impact* on the planning activity because the hazards survey/hazards assessments serve as the comprehensive planning basis for the emergency management program. A finding such as this would constitute a Deficiency.

Program Element: Protective Actions EXAMPLE 2

Repeated OA Observations: Emergency responders and, in particular, incident commanders do not have well established, unambiguous predetermined protective actions that can be readily implemented within a defined geographical area in a timely manner. Most sites do not have a procedure or guide for formulating and implementing protective actions and have not adequately trained their emergency responders to make these decisions in the absence of preplanned response resources. Some sites have not established methods to readily notify personnel downwind of a release so that they can take the protective measures necessary to prevent potentially serious adverse health effects.

DOE Order 151.1 Requirements:

"Protective actions shall be predetermined for onsite personnel and the public and shall include:

… plans for timely sheltering and/or evacuation of workers; …

… methods for providing timely recommendations to appropriate State, Tribal, or local authorities of protective actions such as sheltering, evacuation, relocation, and food control; and …

… Protective Action Guides and Emergency Response Planning Guidelines, prepared in conformance with DOE-approved guidance applicable to the actual or potential release of hazardous materials to the environment, for use in protective action decision-making."

The contractor shall "ensure immediate mitigative and corrective emergency response actions and appropriate protective actions and protective action recommendations to minimize the consequences of the emergency, protect worker and public health and safety, provide security, and ensure continuance of such actions until the emergency is terminated."

DOE Guide Volume IV, Section 2:

"Hazards assessment results are used to establish preplanned protective actions."

"Determining when protective actions are necessary and where those actions must be implemented is the primary concern when planning protective actions."

"Knowledge of the geographic area includes the identification of all receptors of interest for planning protective actions."

"The effectiveness of sheltering in place versus evacuation for different types of events should be considered in establishing criteria" for evacuation and sheltering.

Selected Volume VI Evaluation Criteria:

P/E9.10: "Associated with a specific event classification, the decision-maker obtains default Protective Actions (PAs) and Protective Actions Recommendations (PARs), for immediate implementation onsite or recommendation for offsite."

P/E12.3: "The notification and implementation of onsite PAs and PARs is made in a timely, efficient, and unambiguous manner, confirmed and monitored by the ERO."

P/E12.12: "Candidate PARs are coordinated with offsite authorities and well-defined geographic areas for sheltering and evacuation, special needs areas or special populations, and evacuation routes are readily available."

Affected Outcome: If predetermined protective actions, geographical areas, and receptors have not been identified ahead of time, emergency responders will be required to determine whether to evacuate or shelter-in-place and the area over which to implement and/or recommend these actions based on an assessment of the consequences (including the hazard released, wind speed, wind direction, time of plume arrival, and location of receptors) *in the midst of the emergency response*. This severely reduces the probability that protective actions will be implemented in a "timely" manner, which is defined in the EMG as "fast enough for response activities to be effective in protecting worker and public health and safety." Failure to establish and clearly define preplanned protective measures has a *direct impact* on response activities since prompt and effective communication and implementation of protective measures is necessary to ensure worker and public safety, and thus constitutes a Deficiency.

Program Element: Notifications and Communications EXAMPLE 3

Repeated OA Observations: Notifications and communications do not contain sufficient specificity for individuals and organizations receiving the notifications to take needed actions. Many communications and notifications have lacked essential information regarding protective actions, meteorology, and the nature of the hazardous materials release. As identified in the previous example, some sites have not established methods to readily notify personnel downwind of a release so that they can take appropriate protective measures. Other sites have not ensured that the notification process conveys emergency information to the correct individual or organization with decision-making authority. Many sites also have been unable to execute initial emergency notifications promptly and accurately in accordance with site-specific procedures.

DOE Order 151.1 Requirement:

"For Operational Emergencies, provisions shall be established for prompt initial notification of workers and emergency response personnel and organizations, including appropriate DOE Elements and other Federal, State, Tribal, and local organizations."

DOE Guide Volume III, Section 4 and Volume IV, Section 2:

"Notifications associated with Operational Emergencies are designed to …

- protect facility and site personnel and emergency workers through promulgation of information necessary to implement accountability and protective actions, such as sheltering, evacuation, and decontamination,"
- "notify cognizant offsite authorities and agencies which have protective action decision-making authority for the emergency to facilitate public notification," and
- "formally document categorizations and classifications, notification times, protective action recommendations, and emergency condition changes."

"Each notification message to offsite authorities concerning the declaration of an emergency or change in emergency condition should restate the protective actions being recommended, even if the recommendation is 'no protective action.' "

Selected Volume VI Evaluation Criteria:

P/E10.2: "Initial oral notification messages are not delayed by the inclusion of event information beyond a minimum set, that includes: Location of the event, and the name, organization, location, and telephone number of the caller; Brief description, date and time of the event; Categorization/classification and time of declaration; Release in progress (yes/no); Recommended protective actions."

P/E10.3: "Follow-up notifications use a pre-arranged and standardized content and format that supports the inclusion of critical information concerning the nature of the event, description and status, key times, classification and release status (as required), meteorology, protective actions, affected facility, notification authority."

P/E10.10 b.: "Building and area alarms or public address (PA) systems are installed to alert facility personnel to emergency conditions."

P/E10.10 c.: "Systems are in place for notification of onsite workers and public present onsite but outside the immediate vicinity of the affected facility."

Affected Outcome: Rapid, accurate, and concise communications to emergency responders, site workers, and the public are necessary in order for those individuals to take appropriate protective measures. In addition, the individual/organization receiving the notification must understand the information being transmitted and the actions expected to be taken or the decisions to be considered based upon that information. Failure to establish adequate notification and communication mechanisms has a *direct impact* on response activities since prompt and effective communication and implementation of protective measures is necessary to ensure worker and public safety. A finding such as this would constitute a Deficiency.

Program Element: Training and Drills EXAMPLE 4

Repeated OA Observations: Many emergency responders do not have the necessary proficiency to execute their time-urgent response duties promptly and accurately. Sites have not established training and drill programs based on an objective assessment of responders' duties and needs, and many have not established minimum training requirements for all Emergency Response Organization (ERO) members. The effectiveness of training, drill, and exercise activities is limited by the informal methods being used to manage feedback from these activities, lack of specificity in training, drill, and exercise evaluation criteria, and the fact that these activities do not realistically evaluate responder decision-making skills.

DOE Order 151.1 Requirements:

A coordinated program of training and drills "shall apply to emergency response personnel and organizations that the site/facility expects to respond to onsite emergencies. Emergency-related information shall be available to offsite response organizations."

"Both initial training and annual refresher training shall be provided for the instruction and qualification of all personnel (i.e., primary and alternate) comprising the emergency response organization."

"Drills shall provide supervised, 'hands-on' training for members of emergency response organizations."

The contractor shall "establish and maintain a system to track and verify correction of findings or lessons learned from training, drills, exercises, and actual responses."

DOE Guide Volume V, Section 4:

"The Emergency Management System Program Administrator should produce and annually update the Training Program Plan to assure that the program is accurate and focused on the site/facility personnel knowledge and performance needs …"

"Training topics should reflect the functional position and responsibilities of the trainee."

"All personnel (primary and alternate) should participate in at least one drill or exercise annually."

"Training should address emergency tasks that require team efforts for response and mitigation as well as general team-building skills."

"Drills should be of sufficient scope, duration, and frequency to ensure adequate training for all elements applicable to a facility."

"Training and drills should conclude with some form of measurement or demonstration that indicates completion of training objectives and achievement of qualification standards."

Selected Volume VI Evaluation Criteria:

P3.9: "Training courses are performance-based, customized to program-specific ERO positions, contain learning objectives, and have testing as a final validation of satisfactory completion."

P3.2 e.: "Matrices for the identification and implementation of required training topics versus ERO positions are developed and maintained."

P3.2 f.: "Standards for successful completion of each training activity and requirements for updating, retraining, and remedial training are established and enforced."

P3.7: "Special team training is conducted for functional groups, in particular those with technical and management team assignments."

P2.12: "ERO staff participation in drills, exercises, and responses to actual events is tracked and documented."

Affected Outcome: Emergency responders who have not been adequately trained or have not been required to demonstrate that they can perform their assigned emergency response functions may not be prepared to take the actions necessary to mitigate the effects of an emergency on workers, the public, or the environment. Failure to adequately prepare emergency responders to execute their required duties in an emergency has a *direct impact* on emergency preparedness and thereby constitutes a Deficiency.

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APPENDIX B

APPRAISAL PLANNING AND IMPLEMENTATION CHECKLIST

Appraisal Planning and Implementation Checklist: _____ Site

#	ACTION	NOTES
	Initial Preparation	
1.	* Develop, get approval for, and transmit the notification memo (in advance of scoping). Include the document request list (with due date) as an attachment to the memo.	Issue date: Document due date:
2.	Determine if there have been recent changes in the desired team approach or report format/content.	
3.	Determine/verify team member availability (Fed and contractor) and Q clearance status.	
4.	Verify overall schedule requirements Scoping visit? YES NO GTN team planning meeting? YES NO Draft report left at the site? YES NO	Dates:
5.	Obtain an understanding of the site performance history.	
6.	Consider HQ planning and interviews (e.g., understanding of LPSO/CSO arrangement, other cognizant offices with interests).	
7.	Identify and contact the site POC	Name: Phone:
	Pre-Scoping Preparation	
8.	* Develop (as necessary) and get approval of briefing slides for the scoping visit.	
9.	* Determine lodging requirements/location for scoping team. [Provide scoping team names to the administrative assistant for reservations.] Hotel & address:	Phone: Fax: # Rooms:
10.	* Provide administrative assistant with the name and contact information of the site POC.	Name: Title: Phone:
11.	Ensure that travel arrangements for the scoping visit and the assessment are made, including rental car allocations among team.	
12.	Sign out pager for Team Leader.	

Scoping		
13.	* Check on security/access considerations: __ site badging and required training __ DOE/individual computers __ clearances [Is a Form 277 required?] __ information security requirements	
14.	* Determine lodging requirements/location for assessment team. [Provide team names to the administrative assistant for reservations.] Hotel & address:	Phone: Fax: # Rooms:
15.	* Coordinate team onsite arrangements: __ office space __ LAN access via computer __ telephones & fax __ printer (color ?) __ shredder __ paper availability __ copier __ conference room __ special clothing requirements __ WORD loaded on site computers __ analog telephone lines for modem usage	
16.	Define team and assign individual responsibilities.	
17.	* Identify required/available administrative support (Fed vs. contractor); evaluate if support is needed while on site.	
18.	* Develop and get approval for the memo requesting computer equipment support.	
19.	E-mail PTS with location of hotel for computer delivery.	
20.	* Establish weekly call to the site to discuss upcoming inspection.	
Pre-Assessment (1-2 weeks in advance of assessment)		
21.	Discuss document needs with the team and site POC; arrange for shipment/transmission. [Be aware of special needs for new contractor support personnel (e.g., old reports).]	
22.	Develop, get approval for, and transmit the document request list (with due date) as an attachment to the memo.	Issue date: Document due date:
23.	Perform HQ interviews.	

Pre-Assessment (1-2 weeks in advance of assessment) (continued)		
24.	* Develop evaluation plan transmittal memo, and finalize, get approval for, and transmit the evaluation plan (immediately following scoping).	Issue date:
25.	Understand the expectations for daily communications with OA management, including daily email report format.	
26.	* Finalize the agenda and audience for the entrance briefing.	
27.	* Develop and get approval for entrance briefing slides. Generate color TPs in GTN prior to departure.	
28.	* Make advance arrangements (w/support contractor) for generation and shipping of draft report covers to GTN.	
29.	* Ensure that you are aware of OA manager travel schedules to facilitate approvals/discussions/questions/concerns.	
30.	* Develop the report shell.	
Planning Meeting(s)		
31.	Brief team members on report-writing expectations (minimum format requirements, format logic, format style vs. rating considerations, conclusion, use of "writers' guide", information security).	
32.	Develop and communicate expectations regarding daily team member products & communications.	
33.	Ensure that team members have developed their lines of inquiry and have entered into Lotus Notes their interview schedules.	
34.	Verify team member onsite arrival times/dates and meeting place(s).	
35.	Sign out pager for team leader.	
Onsite Data Collection Phase		
36.	* Determine time/place/audience for daily AM management debriefs.	
37.	* Coordinate with site POC the arrangements for formal validation (e.g., date/time/place, draft report reproduction and distribution, validation protocols, audience). Coordinate with site classification officer on information security requirements, as applicable.	
38.	Circulate list of onsite "office" telephone numbers, hotel rooms, and e-mail addresses among team members and transmit to GTN.	
39.	Ensure that site management is kept appraised on the status of the assessment and developing issues.	
40.	* Coordinate with site POC the arrangements for the exit briefing.	
41.	Develop exit briefing for review by OA management.	

Onsite Data Collection Phase (continued)		
42.	Ensure that the site is familiar with post-assessment CAP schedule, requirements, and expectations.	
43.	* Finalize and get approval for the draft report transmittal memo.	
44.	Prior to leaving site, conduct a lessons-learned discussion with team.	
45.	* Determine overall schedule and content of QRB.	
46.	* Determine QRB composition and expected draft delivery date/time and method of transmission.	
47.	* Develop "1-pager" for briefing senior DOE management during validation week and obtain the site's approval.	
Post-Review		
48.	*. After approval by OA-30, transmit first to site, and then to HQ line.	
49.	Formalize the lessons-learned discussion and forward to OA-30 management.	
50.	Record date of exit briefing.	Date:
51.	Field comments on final draft report due (Line 50 + 10 working days)	Due Date:
52.	Final report due (Line 51 + 10 working days)	Due Date:
53.	* Finalize report and transmit to support contractor for technical editing. [Discuss publication priorities and requirements.] • Incorporate field comments • Have final report covers approved and reproduced	Expected Publication Date: Required # of Reports:
54.	* Submit final report and transmittal memo to OA-1 for approval.	Report Issue Date:
55.	* Authorize support contractor to reproduce report and ship to GTN.	
56.	* Coordinate w/ support contractor and OA-40 to develop PDF & HTML versions of report for posting to OA-30 Web page.	
57.	Make recommendations for briefing affected HQ entities.	
58.	Interim CAP due (final report transmittal + 30 calendar days)	Due Date:
59.	OA comments on interim CAP due (Line 58 + 15 calendar days)	Due Date:
60.	Final CAP due (final report transmittal + 60 calendar days)	Due Date:
61.	OA review of final CAP (Line 60 + 30 calendar days) Comments: YES NO	
62.	Final report posted on OA-30 Web page	Date:
63.	Report findings sent to EH-2 for CATS entry	Date:

Post-Review (continued)		
64.	Ensure that all records have been collected and saved in accordance with OA-30 Appraisal Process Guide, Section 7, Records Management.	
65.	Ensure that all information has been entered into the EMCAPTRACK system.	

* For a combined inspection, the overall Team Leader will perform these functions.

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APPENDIX C

SAMPLE DOCUMENTS

SAMPLE

[Add Appraisal Title]
Document Request List

The following documents are requested in support of the planning efforts for the [add site] [add type of appraisal]. The documents may be provided in either electronic or hard copy form, but our preference would be to (1) have electronic copies of the documents so that they can be easily distributed to the team members in advance of the review, and (2) have copies available at a central location onsite for the team members' use during the review. Documents available electronically should be sent to the following e-mail address: [add team leader e-mail address]. Hard copy documents should be sent to the address provided below no later than [add date]. If the requested documents are already available via the Internet you may, as an alternative, provide the web address and any instructions necessary for us to access them. Additional requests for documents may be identified as team planning efforts proceed. The site is requested to provide a single point of contact to facilitate the coordination and control of the OA-30 team document request. If you have any questions or comments about any item on the list, or alternative approaches for providing this information, please contact [add team leader name] at [add team leader phone].

Shipping address for OA-30 requested documents:

[Team Leader Name]
U.S. Department of Energy
OA-30, Room [C-xxx]
1000 Independence Avenue SW Washington D.C 20585-1290

Document List

Document
Emergency Plan
Emergency Plan Implementing Procedures
Hazards Survey, Hazards Assessment, and associated development guidance documents
Site Safety Analysis Report
Current Emergency Readiness Assurance Plan
Transportation emergency management plan (as applicable, if separate from emergency plan)
Applicable offsite emergency response procedures (e.g., Radiological Assistance Team procedures)
Catalog of onsite/offsite emergency management training courses [if different or in greater detail than that in ERAP]
Matrix of required training courses/qualification status for emergency response organization members [if different than that in ERAP]
Emergency management drill schedule for last two fiscal years
Reports of the previous two annual site emergency management program internal assessments, most recent external assessment, and last major full participation exercise

Document List (continued)

Document (continued)
Memoranda of agreement or understanding among or between [field/area office], [contractor], and non-DOE organizations (e.g., City of [xx], local hospitals and fire departments) regarding any aspect of emergency response, emergency support, or mutual aid
[Field/Area office] and [contractor] plans and procedures for preparing and disseminating emergency public information
Open and closed emergency management issues from deficiency tracking systems for the past 18 months
Any performance measures used by DOE and the contractor to gauge emergency management effectiveness
Current organization charts for the [field/area office] and [contractor] (including any relevant subcontractors) showing line responsibilities for emergency management and response
Current roster of the [site] emergency response organization
The [site] Standards/Requirements Identification Document (S/RID) for emergency management
Name of a "trusted agent" to validate [title of initial incident commander or equivalent] table-top scenarios and/or act as a facilitator.
Roster of qualified incident commanders (with emergency classification/protective action/notification authority)
Detailed site layout map

SAMPLE

Office of Independent Oversight And Performance Assurance

Highlights of the Independent Oversight Review of the [Site] Emergency Management Program

The following information is being distributed in keeping with the commitment to provide a summary that represents the results of the Independent Oversight inspection. Line management, including the Site Office, has reviewed the results contained in this summary.

Positive Attributes

- The Hazards Assessment analyzes the appropriate range of possible emergency scenarios, including the extreme malevolent act, and is being modified to address stakeholder input.
- The Operations Office is prepared to assume its role of coordinating the Department's response to a transportation incident involving a shipment.
- The public information programs provide effective interfaces with Federal, state, tribal, and local agencies, organizations, responders, and the public during both normal and emergency conditions.
- Emergency management self-assessments provide meaningful feedback to improve the program, and lessons learned are an integral part of the process.

Issues Requiring Attention

- The HA consequence analyses and associated output products do not adequately address worst-case scenarios, and did not receive an independent, technical review by DOE.
- The performance tests demonstrated that the tools provided to shift managers do not adequately support all of the initial emergency response actions, including providing prompt notifications to all affected agencies with essential information.
- The qualifications of all emergency response personnel are not being maintained current, and the post-training evaluation of certain emergency responders is not sufficiently challenging.
- The process used to manage corrective actions for the emergency management program is not well defined, and many of these corrective actions are not captured, tracked, and implemented in a timely manner.

Planned Actions

- The DOE site office and site contractors will develop and implement a corrective action plan to address the findings. OA will comment on the corrective actions plans as appropriate and monitor the status of the emergency management program as part of its independent oversight role.

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APPENDIX D

SIGNIFICANT VULNERABILITY FORM

Independent Oversight & Performance Assurance

Significant Vulnerability Form
Emergency Management Oversight (OA-30)

Organization/Facility/Site:	Originator:
Program Element:	Finding #:

1. Significant Vulnerability Statement
Description of the deficiency and its context.

2. Background Information **(requirements/standards/documents reviewed/persons contacted as needed)**
Amplifying information.

3. Approval	
Originator:	Date:
Team Leader/Deputy:	Date:

4. Line Management Response
Response from DOE Line Management and/or Contractor management addressing corrective actions.

5. OA-30 Follow-up Response
OA-30 assessment of corrective actions.

6. Approval	
Originator:	Date:
Team Leader/Deputy:	Date: