

“Significant Provisions” Section:

Summary of Changes in DOE O 151.1C

The CRD for this Order has been completely revised. The Performance-Based Contracts team recognized that the original CRD did not address all expected aspects of an emergency management program. The new CRD appears at Attachment 2 to the Order.

Because DOE facilities are involved in research involving biological agents and toxins, the term “hazardous materials” as used in this Order has been expanded to include biological agents and toxins, along with radioactive and chemical materials.

Consideration of stockpiling of stable iodine for use as a radiological protective prophylaxis was subject to wide discussion after the events of September 11, 2001. As a result, this was specifically included in the change. See paragraph 1g.

Paragraph 3b (Applicability) of the Order was updated to the Departmental standard paragraph. Attachment 1 was also added, showing the organizations to which the Order applies.

Paragraph 3c was added to address substitution of generally accepted standards for the requirements of this Order.

Requirements for emergency planning if a DOE/NNSA facility is leased to another party were added. This is consistent with the guidance provided by memorandum in 2000.

Requirements for emergency planning at closure facilities/sites were added.

The implementation schedule in the Order was updated from the original DOE O 151.1 schedule.

Chapter I:

- The responsibilities of the DOE Office of Security and the Office of Emergency Operations were changed to reflect the assignment of responsibility for the Headquarters Operations Center to the Office of Emergency Operations to the NNSA.
- A set of requirements for the Headquarters Emergency Management Team was added.
- Program Secretarial Officer (PSO) requirements
 - The responsibility of the PSO to ensure adequate funding was changed to reflect that the PSO has control over budget submissions while Congress controls actual funding.
 - Changes in the responsibility to coordinate development of performance measures are mainly the result of changes in organizational structure, not the requirement itself.
 - In keeping with Departmental organizational direction, a responsibility was added to coordinate activities with the Lead Program Secretarial Officer and/or the Cognizant Secretarial Officer when they have a role.

- Cognizant Field Element responsibilities:
 - The responsibility to predesignate employees as the On Scene Coordinator, On Scene Commander, and/or Senior Energy Official existed in DOE O 151.1A. The change in the revision reflects different formatting as well as terminology changes brought on by HSPD-5 and the National Response Plan and some additional details of the requirement.
 - The requirement to approve hazards surveys and hazards assessments existed in the previous Order for the NNSA administrator but was inadvertently left out for the Departmental Operations/Field Office. This responsibility is also in keeping with the DOE IG recommendation in DOE IG Report IG-0594.
 - The Cognizant Field Element manager was given responsibility for implementing the changes resulting from 9-11 and leasing of facilities, discussed above.
 - Added a requirement to approve the annual site exercise package, formalizing a recommended practice from DOE G 151.1-1. This responsibility is also in keeping with the thrust of the DOE IG recommendation, that critical elements of the site emergency management program be approved by DOE.
- Site/Facility Manager responsibilities are for the managers of government-owned and operated sites or facilities. The change here reflects the expectation that they will also meet the requirements levied through the CRD on contractor operated sites and facilities.
- Requirements for the Office of Energy Assurance, with regard to the Energy Emergency program; the Headquarters Office of Management, Budget, and Evaluation, for the Headquarters facilities occupant emergency plans; and the Headquarters Office of Public Affairs, to develop an Emergency Public Information Plan for the Department; were added.

Chapter II is reserved (No Change)

Chapter III:

- Screening of hazardous materials, to determine if an EPHA is required, has been made a part of the Hazards Survey. The screening thresholds have been changed from a list-based approach.
- Implementing a recommendation from the Office of Independent Oversight and Performance Assurance, a time limit was added for categorization of an Operational Emergency after event recognition/identification/discovery.
- Requirements to coordinate the release of medical information was added to implement provision of the Health Insurance Portability and Privacy Act.
- A requirement was added to emergency response that a site/facility must try to resolve the situation.
- The requirement for termination was restated. In addition, a requirement that appeared only in the previous CRD, to determine the root cause of an emergency and the necessary corrective actions, was added.

Chapter IV:

- The time period for updates of the Hazards Survey and EPHA has been aligned, at every three years, unless there are changes to the hazardous materials present or operations conducted at the facility/site.
- The requirement to use the National Interagency Incident Management System's Incident Command System, specified in the National Response Plan and Homeland Security Presidential Directive-5, was added.
- The guidance contained in DOE G 151.1-1 linking EALs and protective actions was formalized into a requirement.
- Requirements contained in DOE N 153.1 regarding the use of NARAC were included.
- Guidance regarding development and timing of submission of elements of exercise packages were formalized. This includes a requirement that the Cognizant Field Element approve exercise packages.
- A requirement was also added, requiring the submission of the final exercise report to line management and the Director, Office of Emergency Operations. This report includes findings and lessons learned, which will support sharing of the lessons from exercises across the complex.
- Requirements concerning lessons learned from exercises, corrective actions, and verification and validation of corrective actions from the DOE IG (IG-0657) were added.

Chapter V:

- Further explanations were added to some Operational Emergency definitions.
- Definitions related to nuclear criticality and mass casualty events were simplified.
- DOE 151.1A definition 2c(5), which dealt with damage to a facility disclosing classified information, was deleted.
- Definition 2d(1) was simplified.
- A criterion for declaring an Operational Emergency involving the release of hazardous biological agents and toxins was added.

There are no significant changes made in **Chapters VI** and **VII**. Reference to Homeland Security Presidential Directive 5 and the National Response Plan were added where appropriate.

Chapter VIII:

- Adds minimum specifications for notification reports of Emergencies to the Headquarters. This is consistent with the proposed revision to the Occurrence Reporting System directives. Those directives refer to DOE O 151.1 for details regarding Operational Emergencies. Reports for Energy Emergency and Emergency Assistance do not fall under the Occurrence Reporting System directives but are covered here.

Chapter IX:

- Requirements were added regarding the need for an Emergency Public Information Plan at Headquarters level and ambiguities in the approval of press releases during an emergency were clarified.
- The requirement for a JIC was changed to only applying for Operational Emergency Hazardous Material Program facilities. Operational Emergency Base Program facilities require establishment of a media center, is a designated location where Cognizant Field Element and contractor personnel can conduct the necessary briefings and press conferences regarding an Operational Emergency at the facility.

Chapter X:

- The chapter was extensively changed to reflect all components of the Readiness Assurance program. The components are not new and are in place across the complex.
- ERAP requirements were changed to reflect the requirements of the Government Performance and Results Act, shortening the period covered by the ERAP.

Chapter XI

- The requirement to review EPHAs for potentially exploitable information was added.

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“Implementation” Section:

As specified in Section 6 Implementation of the introduction to O 151.1C, implementation is required by November 2, 2006. The specific directives of Section 6 are captured below:

- a. Full compliance with the changes made to this order must be accomplished within 1 year of its issuance.
- b. If compliance is not or cannot be completed within 1 year from issuance of this Order, an implementation schedule must be developed by the Cognizant Field Element and submitted to the Program Secretarial Officer with the Emergency Readiness Assurance Plan due October 1, 2006.
- c. Non-Mandatory implementation guidance for this Order is published separately in the multi-volume DOE G 151.1-1 series of Emergency Management Guides (or replacements). DOE G 151.1-1 provides non-mandatory, supplemental information about preferred methods for implementing requirements, including lessons learned, suggested practices, instructions, and suggested performance measures.”