

3. EMERGENCY READINESS ASSURANCE PLANS (ERAPs)

3.1 Introduction

Readiness assurance includes the necessary assessments and documentation to ensure that stated response capabilities are sufficient to implement emergency plans. Emergency Readiness Assurance Plans (ERAPs) provide documentation of the emergency planning and preparedness activities for each site/facility.

Each ERAP serves as the baseline document for emergency readiness assurance evaluations and as a planning tool to identify and develop necessary resources and improvements. All updated plans should highlight any changes in planning bases, organizations or exemptions from previous ERAPs, as well as a comparison of actual achievements to goals, milestones, and objectives.

The ERAP is designed to be an emergency preparedness management tool for all levels of management. ERAPs should provide the appropriate level of information and analysis to be an effective tool for managers at each level. For example, a facility or site ERAP will, by design, have more detail than a DOE operations/field office's compilation ERAP.

This chapter discusses the process for developing and documenting the ERAP. The content and format for the ERAP for a Base Program and Hazardous Material Program is described, including recommendations on sections and information to be included, as well as suggested length and presentation of information.

Base Program. Section 3.3.1 provides a recommended format and content for a Base Program site/facility ERAP. A Base Program for a facility which is more extensive than an office building, for example, may need an ERAP which includes entries comparable in detail to the ERAP for a Hazardous Materials Program.

3.2 Coordination and Approval Process

The formal, hierarchical process of documentation prescribed in DOE O 151.1 is intended to ensure coordination among programmatic emergency management elements consistent with organizational responsibilities. The ERAP development process should follow organizational alignment. The consolidated ERAPs will be used as the basis for the annual status report to the Under Secretary. All elements of DOE with emergency management

responsibilities should follow the ERAP submittal and review process as closely as possible.

Facility. ERAPs should be prepared under the direction of the manager/administrator of each DOE- or contractor-operated facility, operation, or activity. ERAPs should then be submitted to the respective operation/field office by September 30 of each year. For facilities on a multiple facility site, consideration should be given to advancing the facility submission date to allow preparation of the site ERAP discussed below. The ERAP should discuss activities conducted in the fiscal year ending September 30, as well as those planned for the next five fiscal years.

Site. For a multiple facility site, emergency preparedness activities are normally conducted within the context of the entire site. For this reason, each facility manager should prepare an ERAP and submit it to the manager/administrator responsible for the overall site. The manager/administrator for the overall site will then prepare an ERAP for the site. The site ERAP should discuss the site emergency preparedness program and summarize the program described in each facility ERAP. The site ERAP should be submitted to the respective operations/field office by September 30 of each year and will cover activities conducted in the fiscal year ending September 30, as well as those planned for the next 5 fiscal years. The manager/administrator of the overall site may require individual facility managers to submit their ERAPs earlier than September 30 to allow preparation and submission of the overall site ERAP by September 30.

DOE Field Element. Based on the ERAPs submitted by multiple facility sites and independent facilities, the operations/field office should prepare an ERAP that covers the operations/field office emergency preparedness program and summarizes the programs at each multiple facility site and independent facility. The ERAP should discuss activities and major accomplishments conducted in the fiscal year ending September 30, as well as those activities planned and the anticipated goals and objectives for the next 5 fiscal years. The operations/field office ERAP is due to the Director of Emergency Management (NN-60) and the Cognizant Secretarial Officer by November 30 of each year.

Director of Emergency Management. Using the ERAPs submitted by the operation/field office the Director of Emergency Management prepares an annual report that summarizes the status of the emergency preparedness program within the Department. This report should be coordinated with the Cognizant Secretarial Officers. The report is due to the Under Secretary by April 30 of each year.

3.3 Content and Format

The ERAP is intended to convey information briefly and succinctly. Operations/field office ERAPs should summarize and analyze information provided by facility ERAPs. Each section of the ERAP should be organized to separate information into the following general categories.

- Background material and procedures not subject to frequent changes.
- Information updated annually (e.g., reports on the activities and accomplishments of the past year and plans, schedules, and budgets for the next 5 fiscal years).

Because ERAPs are designed to be management tools, all ERAPs should use tables whenever practical to consolidate and summarize information. Facility/site ERAPs should typically be on the order of a few tens of pages, with consolidated ERAPs (operations/field office and Headquarters) on the order of 20 pages in length. Base Program ERAPs could vary from less than ten to a few tens of pages. The document length will depend on the amount of detail included and the number of facilities/sites covered.

3.3.1 Base Program ERAP

The format and content described in this section apply to DOE sites/facilities not required to develop and maintain an Operational Emergency Hazardous Material Emergency Program, based on the results of their Hazards Survey. The following categories should be included in a Base Program ERAP as a minimum.

Executive Summary. Summarize the overall status of the emergency management readiness assurance program for the entire site or facility.

Program Description. Include the site description and mission and reasons for classification as a Base Program site. This should include results from the Hazards Survey.

External Coordination. List all coordination actions with offsite emergency response agencies if applicable.

Training and Drills. List all related training programs, to include GET, fire drills, or any other related training programs that are required. Provide a brief description of topics

covered during training and include all annual training requirements for any emergency response personnel on site. Any conditions prohibiting training should also be cited here.

Evaluations, Appraisals, Assessments. Briefly describe any evaluations, appraisals, or self-assessments conducted or planned over the next fiscal year. List all evaluations or appraisals by offsite response agencies (e.g., DOT, fire department).

Resource Requirements. Project the requirements for emergency management dedicated personnel, resources, and equipment for the next 5 fiscal years. In a table show the number of full-time employees or percentage thereof, the number currently working, the estimated emergency management costs for the next 5 fiscal years, and the amount spent in the last fiscal year.

Other. Discuss any concerns pertinent to the emergency readiness assurance program, especially site/facility-unique items. State and local issues regarding the Emergency Management Program should also be included.

3.3.2 Hazardous Material Program ERAP

The Hazards Survey results for facilities will determine the requirement for an Operational Emergency Hazardous Material Program. As a minimum, ERAPs should contain the following sections, including the information as defined below.

Executive Summary. Summarize the overall status of the emergency readiness assurance program for the entire site or facility. This brief summary should allow senior management to obtain information about program status. Previous emergency management knowledge should not be assumed. Key management review areas such as resource requirements and corrective actions should be addressed. Extensive background information and historical data available to line management in other documents should not be included.

Program Description. Describe the emergency readiness assurance program in sufficient detail to document program adequacy. The program description should address site description and mission; status of emergency preparedness plans and implementing procedures; concept of emergency operations; Emergency Response Organization (ERO) components and status; and number of full-time emergency preparedness personnel.

Exemptions. List any approved or requested exemptions to requirements of the DOE Emergency Management System. Exemptions to DOE O 151.1 requirements are

approved by the Under Secretary, with the concurrence of the Director of Emergency Management and, if appropriate, the Assistant Secretary of Environment, Safety and Health. Exemptions should be coordinated with the Associate Deputy Secretary for Field Management, if appropriate. The list should state why the exemption was requested, when it was approved, and the duration of the exemption. Changes to previous exemptions should be highlighted in this section.

Hazard Surveys/Hazards Assessments. Emergency Management Programs are to be commensurate with the hazards of the facilities, activities, and operations. The following information is needed.

- The status of the Hazards Surveys and Hazards Assessments, including completion date. If a survey or assessment has not been completed, state the plan to correct this, the estimated completion dates, and the subsequent event categorization/classification criteria (e.g., EALs).
- Briefly discuss the range of Operational Emergencies, including potential radiological and nonradiological emergencies applicable to the site, facility, or operation, with references to appropriate resource documents. List and describe the types of potential emergencies, to include initiating events and the basis used in determining identified hazards. Worst-case scenarios should be addressed.

External Coordination. Summarize all coordination actions taken with external emergency response organizations and resources. A list of appropriate current or in-process memoranda of agreement, mutual aid agreements, or memoranda of understanding with these organizations should also be included. Initiation, revision, and expiration dates for each of these should also be provided in a table, if appropriate. Noteworthy external participation in training, drills, or exercises should also be included.

Training, Drills, and Exercises.

- List training programs designed to meet individual needs as well as specialized team training and drills. Using a table, if appropriate, show the number and percent of ERO members trained by ERO position or as a team.
- Specific reference should be made to training plans and goals for the current and next fiscal year.

- The exercise program should be discussed in this section. The overall objectives of the exercise program for the subsequent 5 fiscal years should be described. A table, showing projected dates for exercises, is appropriate. For the current and next fiscal year (and subsequent years, if known), identify the major purpose of the exercise and the type of hazard simulated during the exercise. Include information on the use of exercise results and training course critiques to improve plans, procedures, training, and exercises. Include a summary of significant open exercise findings.
- Any conditions prohibiting training requirement fulfillment should be cited here, as well as in the exemptions section.

Evaluations, Appraisals, Assessments. Discuss the scheduling of evaluations and appraisals for the current and next fiscal year and, to the extent feasible, for a 5-fiscal-year period. The organizations conducting each evaluation or appraisal and their objectives should be clearly identified. Information on self-assessments may also be included and should be clearly identified. Evaluation and appraisal findings should be contained in the section on findings and corrective actions.

Findings and Corrective Actions. With a focus on major findings, summarize outstanding evaluation/appraisal findings, citing the corrections assigned as well as those validated as resolved during the past fiscal year. Identify the priority for completion and estimated completion dates for correction of open, major findings. Related findings and corrective actions should be consolidated as much as possible. A verbatim statement of findings and corrective actions from previous reports is not appropriate for an ERAP.

Resource Requirements. Project the requirements for emergency management dedicated personnel, resources, and equipment for the next 5 fiscal years.

- Include information regarding emergency management budget support systems, funding/appropriations, related training, and facilities/response elements necessary to maintain an appropriate level of emergency preparedness. This list should include necessities developed from actual operational needs such as EOC equipment, field monitoring equipment, and Radiological Assistance Program Team equipment. This section should be done in table format and should not include nonemergency items, such as those pertaining specifically to safety (e.g., Safety Analysis Reports). The budget table should also include a column for the amount of funds spent on emergency management items and personnel last year. This section may require DOE elements and operating contractors to extrapolate

budget information from other budget areas when emergency management items fall under another line item. This section should clearly identify resources required and currently funded.

- In table form, if appropriate, outline the emergency management personnel required and those currently available. Information on personnel should distinguish full-time emergency management personnel from those assigned additional duties.

Other. Discuss concerns pertinent to the emergency readiness assurance program, especially site/facility-unique items. State and local issues and concerns should be included in this section, if not already covered. The focus should be on projected conflicts, future concerns, or issues that need senior management resolution or attention. Any discussion of a concern should present suggestions or methods to resolve the issue.

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