

QUESTION: Is an individual's participation in an annual exercise required to qualify for participation in the ERO? Keeping all members (response teams) of the ERO 'qualified' is fiscally and operationally impossible on an annual basis if the requirement is for all ERO members to be exercised annually. It would mean that we need to have many exercises, which test response to different hazards, every year.

ANSWER: Annual participation in an exercise is not required by DOE O 151.1C for an individual to 'qualify' for the ERO. Many facility-level/site-level exercises would be required to include all ERO teams/members, both primary and alternate. 'Qualifications' for ERO participation are not addressed in DOE O 151.1C. Rather, the Order requires that ERO personnel demonstrate proficiency in their ERO position.

The Order requirement related to each member of the ERO is found in Paragraph 4.a. (1):

“Both initial training and annual refresher training must be provided for the instruction of and demonstration of proficiency by all personnel (i.e., primary and alternate) comprising the emergency response organization.”

An annual demonstration of proficiency by all personnel (i.e., primary and alternate) comprising the ERO, especially those who perform functions on the ERO that are not necessarily associated with their usual duties, such as, consequence assessment team members and EOC positions, can be accomplished through actual emergency response, the annual facility- or site-level exercises, some forms of discussion-based exercises, periodic evaluated drills, or Limited Scope Performance Tests (LSPTs) [Cf. DOE G 151.1-3, Section 4.3.1].

Emergency response personnel (e.g., fire, HAZMAT, emergency medical services) that perform essentially the same functions on an ERO as they do on a day-to-day basis, demonstrate proficiency doing their everyday jobs. This may also include skilled positions such as health physicists, radiation control technicians, radiation field monitoring teams, and industrial hygienists.