

FACILITY ROTATION SCHEDULE FOR SITE EXERCISES

QUESTION: On multiple-facility sites, the basis for the annual site exercise must be rotated among Hazardous Materials Program facilities. Is a simple rotation-in-turn scheme among all the facilities sufficient to satisfy the DOE O 151.1C site-level exercise requirement?

ANSWER: DOE O 151.1C exercise requirements for DOE/NNSA Hazardous Materials Program facilities are summarized below:

- 1) A formal exercise program must be established to validate *all facility-* and *site-level* elements of the emergency management program over a *five-year period*.

DOE O 151.1C, Attachment 2, p. 10, 6:

A formal exercise program must validate all elements of an emergency management program over a 5-year period. The exercise program must validate facility and site-level emergency management program elements by initiating response to simulated, realistic emergency events/conditions in a manner that, as nearly as possible, replicates an integrated emergency response to an actual event.

DOE O 151.1C, Attachment 2, p. 10, 6.b:

The contractor at DOE/NNSA Operational Emergency Hazardous Material Program facilities must also establish a formal exercise program to validate all elements of the emergency management program over a 5-year period.

- 2) Each facility must exercise its *facility-level* emergency response capability *annually*.

DOE O 151.1C, Attachment 2, p. 10, 6.b (1):

Each DOE/NNSA facility subject to this CRD paragraph must exercise its emergency response capability annually and include at least facility-level evaluation and critique. Evaluations of annual facility exercises by Departmental entities (e.g., Cognizant Field Element, Program Secretarial Officer or Headquarters Office of Security and Safety Performance Assurance) must be performed periodically so that each facility has an external Departmental evaluation at least every three years.

- 3) Each facility must participate in the *rotation* schedule for the *annual site-level exercise*:

DOE O 151.1C, Attachment 2, p. 10, 6.b (2):

Site-level emergency response organization elements and resources must participate in a minimum of one exercise annually. This site exercise must be designed to test and demonstrate the site's integrated emergency response capability. For multiple-facility sites, the basis for the exercise must be rotated among facilities.

The annual facility-level exercise and participation in the rotation schedule for the site exercise generally satisfy all exercise requirements for DOE/NNSA Hazardous Materials Program facilities and sites, as long as all of the components of facility- and site-level response capabilities are validated over a 5-year period. However, in the situation where site-level response components or elements may only respond to certain facilities, participation in the site exercise rotation may not allow validation during a 5-year period.

As an example of this situation, consider a site that has ten facilities with chemical hazards only and one facility with radioactive material hazards. Assuming there are site-level response components that only respond to a radioactive release, participation in the site exercise rotation schedule alone would not allow validation of these site-level components within a 5-year period.

One way to satisfy the 5-year requirement in this case would be to ensure that the radioactive material facility is the focus of the site exercise at least every 5 years rather than participation in turn with the other ten facilities. Alternatively, every five years the facility-level exercise for the radioactive material facility would involve the participation of those site-level components or elements that respond to radioactive releases. To limit the scope of this facility-level exercise, other site-level components may be simulated or participate using a discussion-based exercise.