QUESTION: Does DOE O 151.1C require the facility/site contractor to review emergency plans and procedures annually?

ANSWER: DOE O 151.1C, Chapter I, 9.q. states that Cognizant Field Element Managers: "Ensure that emergency plans and procedures are prepared, reviewed annually, and updated, as necessary, for all facilities under their purview and are integrated within the overall Cognizant Field Element emergency preparedness program." There is no parallel statement in the Contractors Requirement Document (CRD) that explicitly requires the Contractor to review their emergency plans and procedures annually in order for the Cognizant Field Element Manager to ensure that it's being done to meet requirement 9.q. This was an oversight on the part of NA-41 in developing and correlating the Order and CRD requirements. There should have been a statement similar to Chapter I, Section 9.q, in the CRD.

Attachment 2, paragraph 7 (CRD) states that the "emergency management Readiness Assurance Program must establish a framework and associated mechanisms for assuring that **emergency plans, implementing procedures,** and resources are adequate by ensuring that they are **sufficiently maintained**, exercised, and **evaluated** (**including assessment and appraisal**)...." *[emphasis added]* CRD subparagraph 7.a. (1) further requires that the "contractor must conduct an annual self-assessment of their emergency management programs." Taken together, these sentences imply that the emergency plan and implementing procedures should be reviewed each year. Further, because the emergency management program is documented in the emergency plan and implementing procedures, an annual self-assessment of the program would be without merit if it did not include a review of the emergency plan and implementing procedures.

Although there is no explicit requirement for an annual review of emergency plans and procedures in the CRD, the requirement of Chapter I, 9.q, strongly implies that a corresponding annual review of the Emergency Plan and procedures by the contractor was an intended requirement of the CRD.