

EXTERNAL EVENTS

*The
WILDCARD
of
EMERGENCY
MANAGEMENT*

SRS

**Hazards Surveys
& Assessments**

OA-30 Inspection Results

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Hazard Surveys & Assessments

Finding #1: For analyzed severe malevolent act scenarios where protective action guidelines are expected to be exceeded at the site boundary, the EPHAs do not support the formulation of timely predetermined PARs, as required by DOE Order 151.1B, *Comprehensive Emergency Management System*, and the SRS emergency plan.



Finding Explanation

- EPHA process does not lead to development of technically based, predetermined PARs for severe malevolent accidents that have been analyzed. Although EPHAs make appropriate use of security event analysis to represent severe malevolent acts for classification purposes, EPHAs do not contain information necessary to develop predetermined PARs for these events. Shortcoming is a result of two factors:
 - Existing DOE guidance directs exclusion of severe malevolent acts from EPZ determination process.
 - WSRC misunderstood DOE's policy regarding development of predetermined PARs. WSRC believed predetermined PARs did not have to be developed for areas outside the EPZ, even though WSRC analyses of severe malevolent acts for some facilities resulted in the potential for GEs. Consequently, EDOs do not have access to predetermined PARs for timely issuance to offsite authorities for use in protecting members of the public who are near the site but outside the EPZ.

Opportunities for Improvement (DOE-SR)

- Ensure all personnel performing walkdowns of chemical inventories to support hazards survey development have a clear understanding of key conditions and assumptions used in the hazards survey (HS).
Specific items to consider :
 - Ensure HS contains current report for identification & location of chemicals
 - Ensure chemicals are in location and form assumed in HS
 - Ensure container type, size, and storage condition are as assumed in HS
 - Ensure hazmat exclusions are appropriately applied and recorded
 - Ensure adequate controls to maintain validity of segmentation assumptions used to screen hazardous materials based on quantity
 - Ensure facility physical inventory methods & frequency are adequate for maintaining accurate tracking system. Specifically, verify methods are included to reconcile differences between chemicals found in facility but not in material tracking system.

Opportunities for Improvement (WSRC)

- Enhance HS procedure by providing additional guidance that is more practical for field implementation and contains more specificity regarding assumed controls:
 - Convert 10 micron exclusion to one readily usable by screener
 - Require use of FMTS or walkdowns
 - requirement that design or admin controls must be implemented when using segmentation
- Enhance planning activities being considered in advance of implementation of DOE O 151.1C:
 - Evaluate exclusion for material stored in Type B containers that will be impacted by new overpack % certification requirements
 - Revise procedures to designate AEGs as preferred chem PAC

