



Department of Energy  
National Nuclear Security Administration  
Washington, DC 20585



**JM CHRONOLOGY**

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DRB DISCUSSION 7/16/15

MEMORANDUM FOR RANDALL M. HENDRICKSON  
ASSOCIATE ADMINISTRATOR  
FOR MANAGEMENT AND BUDGET

THROUGH: INGRID KOLB  
DIRECTOR  
OFFICE OF MANAGEMENT

FROM: *For* DEBORAH A. WILBER  
ASSOCIATE ADMINISTRATOR  
FOR EMERGENCY OPERATIONS

*David Brown*

SUBJECT: Notice of Intent to Revise Department of Energy Order 151.1C,  
*Comprehensive Emergency Management System*

**PURPOSE:** In accordance with Department of Energy (DOE) Order 251.1C, *Departmental Directives Program*, the Office of Emergency Operations (NA-40) proposes to revise DOE Order 151.1C to reflect updates and changes since the last revision, dated November 2, 2005.

**JUSTIFICATION:** DOE Order 151.1C establishes policy and assigns/describes roles and responsibilities for the DOE Emergency Management System. The directive is necessary for providing a framework for development, coordination, control, and direction of all emergency planning, preparedness, readiness assurance, response, and recovery actions at all DOE and National Nuclear Security Administration (NNSA) sites and facilities (DOE Order 151.1C applies to DOE and NNSA).

A revision is necessary for several reasons. These include:

- Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2014-1, *Emergency Preparedness and Response*, was issued on September 3, 2014. It included a recommendation that DOE update its emergency management directive to address several concerns detailed in the report. On November 7, 2014, Secretary Moniz responded to the DNFSB Recommendation 2014-1 and prepared an Implementation Plan (IP) to address the issues identified in the Recommendation. The DOE IP for DNFSB Recommendation 2014-1 was received by the DNFSB on April 29, 2015. The IP, signed by the Secretary of Energy, contains milestones and deliverables for revising DOE Order 151.1C, including a commitment to the DNFSB that a new Emergency Management Order will be issued by November 1, 2016.

*lead 6/17/2015 CB*



- Conflicts, omissions, deficiencies, and inconsistent interpretations within the existing DOE Order 151.1C have been self-identified by the Office of Emergency Management, or revealed by field elements and program offices since the order was issued in 2005. To adequately address these issues until the next revision could be produced, a series of over 50 Frequently Asked Questions (FAQs) was developed. The intent is to integrate these FAQs into the updated order, and to update/clarify observations identified through a series of assessments conducted by oversight entities in order to provide necessary clarifications and updated guidance in the revised order. The update and modifications to DOE Order 151.1C will be performed in close coordination and synchronization with field elements and program offices.
- The existing order needs to be updated to 1) better integrate with existing orders, 2) allow field elements to use a graded approach in the implementation of requirements, and 3) better leverage consensus standards and Department of Homeland Security (DHS) concepts that are either lacking in the existing order, or have been updated by DHS, such as the Incident Command System, the National Response Framework, and the National Incident Management System.

While the update to DOE Order 151.1C may involve a restructuring of the Order, the revision will continue to address a baseline set of emergency management requirements that will address accountability and responsibility across the DOE enterprise and its diverse facilities and sites.

- More emphasis on emergency management requirements related to severe events is needed, as lessons learned from the 2011 Fukushima Daiichi nuclear power plant disaster made clear. NA-40 has committed to making changes to address severe events in the next version of the emergency management order, as reflected in the August 2011, *Report to the Secretary, Review of Requirements and Capabilities for Analyzing and Responding to Beyond Design Basis Events* and the January 2013, *Report to the Secretary of Energy: Beyond Design Basis Event Pilot Evaluations*.

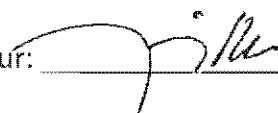
There are no valid external, consensus, or other standards (e.g., International Organization for Standardization, and the Occupational Safety and Health Administration Voluntary Protection Programs, etc.) available which can be used in place of this directive.

**IMPACT:** The proposed revision to DOE Order 151.1C does not duplicate existing laws, regulations, or national standards, and does not create an undue burden on the Department.

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Ingrid Kolb, Director, Office of Management (MA-1):

Concur:  Non-concur: \_\_\_\_\_ Date: 8-6-2015

Randall M. Hendrickson, Acting Associate Administrator for Management and Budget  
(NA-MB-1):

Concur: \_\_\_\_\_ Non-concur: \_\_\_\_\_ Date: \_\_\_\_\_

The schedule for Directive Development below differs from the Standard Schedule in order to be consistent with the milestones established in Implementation Plan for the DNFSB Recommendation 2014-1, *Emergency Preparedness and Response*, signed by the Secretary on April 24, 2015.

**Schedule for Directive Development**

Draft Development	180 days
Review and Comment (RevCom)	120 days
Comment Resolution	150 days
Final Review	30 days
Total	480 days

Ingrid Kolb, Director, Office of Management (MA-1):

Concur: \_\_\_\_\_ Non-concur: \_\_\_\_\_ Date: \_\_\_\_\_

Randall M. Hendrickson, Associate Administrator for Management and Budget (NA-MB-1):

Concur:  \_\_\_\_\_ Non-concur: \_\_\_\_\_ Date: 13 AUG 15

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## 7.0 MILESTONES

The Department believes that these actions are appropriate for implementing the overall intent of DNFSB Recommendation 2014-1 in a measured and prudent fashion. These actions will further strengthen the Emergency Preparedness and Response Program and help to protect the public and workers at the DOE's defense nuclear facilities as well as the rest of the DOE complex. The table below lists the Milestones as they appear in the text of this IP. This table is followed by a graphic which shows the relationship between the various milestones.

**Table 7.0 – Recommendation 2014-1 Integrated Milestones**

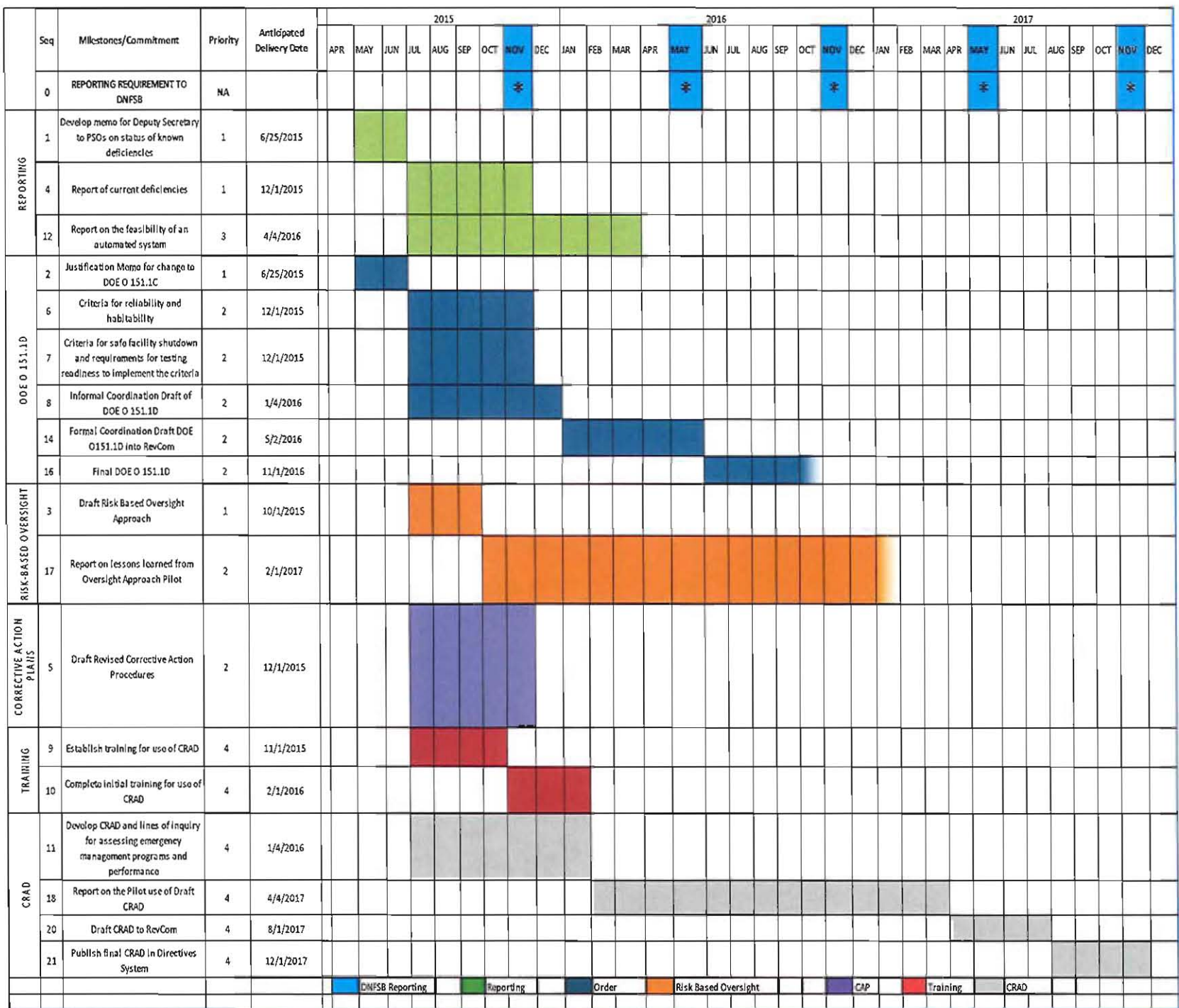
Links to DNFSB Rec	IP Section	Priority	Responsible Organization	Milestones/ Commitment	Deliverable	Anticipated Delivery Date
1	6.1.1.1	1	Office of Emergency Operations / NA-40	Draft Risk Based Oversight Approach	Copy of the Approach	10-1-15
1	6.1.1.1	2	Office of Emergency Operations / NA-40	Report on lessons learned from Oversight Approach Pilot	Copy of the Report	2-1-17
1	6.1.1.1	2	Office of Emergency Operations / NA-40	Secretarial Direction to Implement the Risk Based Approach	Copy of the Secretarial Directive	5-2-17
1	6.1.1.2	4	Office of Emergency Operations / NA-40	Develop CRAD and lines of inquiry for assessing emergency management programs and risk	CRAD Draft	1-4-16
1	6.1.1.2	4	Office of Emergency Operations / NA-40	Report on the Pilot use of Draft CRAD	Copy of the Report	4-4-17
1	6.1.1.2	4	Office of Emergency Operations / NA-40	Draft CRAD to RevCom	Copy of the RevCom Draft	8-1-17
1	6.1.1.2	4	Office of Emergency Operations / NA-40	Publish final CRAD in Directives System	Copy of Final CRAD	12-1-17



Links to DNFSB Rec	IP Section	Priority	Responsible Organization	Milestones/ Commitment	Deliverable	Anticipated Delivery Date
1	6.1.1.2	4	Office of Emergency Operations / NA-40.2	Establish training for use of CRAD	Letter to DNFSB with CRAD training schedule	11-1-15
1	6.1.1.2	4	Office of Emergency Operations / NA-40.2	Complete initial training for use of CRAD	Letter to DNFSB reporting completion of initial training	2-1-16
1	6.1.2	2	Office of Emergency Operations / NA-40	Draft Revised Corrective Action Procedures	Copy of draft procedures	12-1-15
1	6.1.2	2	Office of Emergency Operations / NA-40	Report on pilot of draft corrective action procedures	Copy of the report	11-1-16
1	6.1.2	2	Office of Emergency Operations / NA-40	Secretarial Direction to Implement the Revised Corrective Action Procedures	Copy of the Secretarial Directive	2-1-17
1d	6.1.3	1	Office of Emergency Operations / NA-40	Develop memo for Deputy Secretary to PSOs on status of known deficiencies	Copy of Memo	6-25-15
1d	6.1.3	1	Office of Emergency Operations / NA-40	Report of current deficiencies	Copy of Report	12-1-15
1d	6.1.3	3	DOE CIO	Report on the feasibility of an automated system	Copy of Report	4-4-16
2b	6.2.1	2	Office of Emergency Operations / NA-40	Criteria for reliability and habitability	Copy of Report	12-1-15
2a,c , & d	6.2.2	2	Office of Emergency Operations / NA-40	Criteria for safe facility shutdown and requirements for testing readiness to implement the criteria	Copy of Technical paper	12-1-15

Links to DNFSB Rec	IP Section	Priority	Responsible Organization	Milestones/ Commitment	Deliverable	Anticipated Delivery Date
2	6.2.3	1	Office of Emergency Operations / NA-40	Justification Memo for change to DOE Order 151.1C	Copy of Justification Memo	6-25-15
2	6.2.3	2	Office of Emergency Operations / NA-40	Informal Coordination Draft of DOE Order 151.1D	Copy of draft	1-4-16
2	6.2.3	2	Office of Emergency Operations / NA-40	Formal Coordination Draft DOE Order 151.1D into RevCom	Copy of Draft	5-2-16
2	6.2.3	2	Office of Emergency Operations / NA-40	Final DOE Order 151.1D	Copy of issued Order	11-1-16
	9.0		Office of Emergency Operations / NA-40	Update DNFSB	Briefing	Every 6 months

Figure 7.0 – Milestones Timeline





## **8.0 SUMMARY**

The emergency response and emergency preparedness actions identified in this IP demonstrate DOE's commitment to enhanced operational effectiveness of its Emergency Management Enterprise and protecting the public and workers at the DOE's defense nuclear facilities. The Department believes that these actions will improve the overall effectiveness of the Emergency Management Enterprise and will address the intent of the DNFSB Recommendation 2014-1 in a measured and prudent fashion.

## **9.0 ORGANIZATION AND MANAGEMENT**

Overall execution of this IP is the responsibility of the Associate Administrator of the Office of Emergency Operations, who is assigned as Responsible Manager. The EIMC, chaired by the Deputy Secretary, will provide strategic direction and oversight for the execution of this Implementation Plan. The EIMC provides the forum for management decisions related to the adequate resourcing of the Emergency Management Enterprise.

The Emergency Management Advisory Committee (EMAC), which includes Federal staff responsible for emergency management in Headquarters staff and program offices as well as at the Cognizant Field Elements, will support development of the technical products committed to in the Plan. The Cognizant Field Element members of the EMAC may be supported by contractors from DOE Sites and National Laboratories. Responsibility for the implementation of changes in emergency management policy and requirements will reside with the Program Secretarial Officers.

DOE will engage the DNFSB staff during the development of the products and deliverables identified in this Implementation Plan to allow for DNFSB staff input. The Department will provide progress reports to the Board approximately every six months.