

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 1 of 8

## 1.0 PURPOSE

This procedure establishes the requirements for the Hanford Site Emergency Management Exercise Program. This procedure supplements the requirements of DOE/RL 94-02, *Hanford Emergency Management Plan*, Section 13.0, "Exercises," which implements the exercise program requirements of DOE O 151.1D, *Comprehensive Emergency Management System*.

## 2.0 SCOPE

The provisions for this procedure apply to the U. S. Department of Energy (DOE), Richland Operations Office (RL), Office of River Protection (ORP), Pacific Northwest Site Office (PNSO), and Hanford Site contractors required to conduct emergency preparedness exercises in accordance with DOE/RL 94-02. This procedure specifically addresses the following activities:

- Field exercise;
- Limited exercise;
- DOE evaluation of contractor drill performed for exercise credit; and
- Actual event as directed by DOE.

The requirements for assessments, including the annual RL/ORP/PNSO self-assessments, periodic RL/ORP/PNSO assessments of contractor programs, and annual contractor self-assessments, are addressed in RLEP 3.29, *Emergency Management Assessment Program*. The requirements for annual contractor drills performed for exercise credit are addressed in RLEP 3.30, *Emergency Management Drill Program*.

## 3.0 REQUIREMENTS

A comprehensive and integrated exercise program must be established and implemented, consistent with the hazards and risks associated with the work performed, to test and validate all elements of the Hanford Site emergency management program over a five-year period. The emergency management exercise program shall be based on the requirements outlined in DOE 151.1D, *Comprehensive Emergency Management System*, as augmented with applicable DOE guidance documents. The Hanford Site emergency management exercise program will implement requirements set forth in DOE O 151.1D, Appendix A, *Responsibilities*, Attachment 3, *Emergency Management Core Program*, Attachment 4, *Emergency Management Hazardous Materials Program*, Attachment 1, *Contractor Requirements Document*, and programmatic element criteria listed in the Baseline Criteria Review and Approach Document (CRAD) issued by DOE HQ or in DOE G 151.1-3, *Programmatic Elements/Emergency Management Guide*, Appendix D, "Evaluation Criteria."

### 3.1 RL/ORP/PNSO Managers

- Establish a formal exercise program to validate all elements of the facility- and site-level emergency management program over a five-year period;
- Maintain exercise documentation that contains, but is not limited to, the exercise scope, objectives and corresponding evaluation criteria, a narrative description of the scenario, timeline, and a list of participants;
- Exercise site-level emergency response organization elements and resources annually in order to test and demonstrate the site's integrated emergency response capability;

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 2 of 8

- Rotate the basis for the exercise among facilities;
- Invite offsite response organizations to participate in a site-level exercise at least once every three years;
- Issue exercise evaluation reports to affected contractors;
- Ensure the effectiveness of completed corrective actions through verification and validations conducted by an independent reviewer;
- Test communications systems with DOE Headquarters and offsite agencies at least annually or as often as needed to ensure that communications systems are operational;

**3.2 Hanford Site Contractors**

- Hanford Site contractors with hazardous facilities or that have organizations and functions that respond to emergency events shall:
  - comply with the annual exercise schedule issued by RL Security, Emergency Services, and Information Management (SEI);
  - support development, conduct, and evaluation of exercises at their facility or involving functional areas;
  - provide members to participate in the scenario development process when their facility or function is involved;
  - provide qualified controllers and or evaluators for conduct and evaluation of exercises; and
  - require participation by appropriate staff in exercises and associated training.
- DOE contractor-operated facilities not on the annual exercise schedule must conduct an evaluated drill for exercise credit in accordance with RLEP 3.30;
- Corrective action plans for exercises and DOE evaluations of drills for exercise credit must be developed in accordance with RLEP 3.29 and provided to RL/ORP/PNSO, as applicable, within 45 calendar days from the date of the evaluation report transmittal letter;
- Corrective action closure documentation for exercises and DOE evaluations of drills for exercise credit must be submitted in accordance with RLEP 3.29;
- When the drill is required to be independently evaluated by DOE, as identified on the annual exercise schedule, drill documentation must be submitted as follows:
  - the drill package must be submitted to the RL EP Program Manager no later than five working days prior to the drill; and
  - the final drill report must be submitted no later than 30 working days following conduct of the drill.

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 3 of 8

## 4.0 RESPONSIBILITIES

### 4.1 RL Emergency Preparedness Program Manager

The RL Emergency Preparedness Program Manager is responsible for the overall exercise program and ensuring exercise program activities are initiated and completed in a timely and efficient manner.

Specific responsibilities include:

- Ensuring the site-level exercise program validates all elements of the emergency management program over a five-year period;
- Ensuring exercises are developed, documented, controlled, and conducted in accordance with requirements;
- Approving the annual exercise schedule and transmitting to Hanford Site contractors;
- Coordinating with DOE-HQ to facilitate participation by HQ staff (HQ Emergency Management Team, Consolidated Emergency Operations Center Watch Office, etc.) on Hanford emergency management activities;
- Approving exercise packages prior to the exercise;
- Ensuring Operational Emergency after action reports are submitted to the Associate Administrator, Office of Emergency Operations, and Program Secretarial Officer(s). This report may be done in conjunction with the Final Occurrence Report in accordance with DOE O 232.2, *Occurrence Reporting and Processing of Operations Information*;
- Approving exercise announcements prior to issue to Hanford Site contractors;
- Approving exercise exemption requests, in coordination with DOE project management and field offices, in accordance with the exercise exemption process;
- Ensuring exercise evaluations are based on the applicable criteria identified in the Baseline Criteria Review and Approach Document (CRAD) issued by DOE-HQ, or the criteria in DOE G 151.1-3, Appendix D;
- Coordinating exercise or response evaluations with ORP/PNSO in accordance with established memoranda of understanding;
- Approving exercise evaluation reports;
- Approving corrective action plans submitted by Hanford Site contractors in conjunction with ORP and PNSO as applicable;
- Ensuring exercise corrective actions are entered into the appropriate tracking system and tracked to completion;
- Ensuring completed corrective actions have been verified and validated by an independent reviewer to ensure the actions taken have effectively resolved the original finding, and approving final closure of corrective actions in conjunction with ORP and PNSO as applicable;
- Ensuring coordination with DOE Federal assets (i.e., Radiological Assistance Program, Aerial Measurement System, Federal Radiological Monitoring and Assessment Center, Radiation

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 4 of 8

Emergency Assistance Center/Training Site, National Atmospheric Release Advisory Capability) is periodically demonstrated; and

- Ensuring a system for incorporating and tracking lessons learned is maintained.

#### **4.2 ORP/PNSO Emergency Preparedness Liaison**

Specific responsibilities include:

- Supporting exercise development, conduct, and evaluation;
- Reviewing exercise packages and exercise evaluation reports for their respective field office;
- Disseminating final evaluation reports to their respective contractors; and
- Assisting the RL Emergency Preparedness Program Manager with verification and validation of corrective actions.

#### **4.3 Hanford Site Contractors**

Specific responsibilities include:

- Participating in exercise planning and follow-up meetings as requested;
- Ensuring the site-wide exercise and protective action drill schedule is communicated and coordinated to minimize scheduling conflicts and ensure participation by contractor personnel;
- Ensuring facility drill scenarios at facilities with an upcoming exercise are coordinated with the site exercise team. Drills conducted in advance of an upcoming exercise must not involve scenarios similar in nature to the planned exercise scenario.
- Providing a copy of the annual drill schedule to the RL Emergency Preparedness Program Manager indicating planned drills to meet facility drill for exercise credit requirements;
- Submitting exercise exemption requests to RL and the respective DOE EP office, as applicable, at least 5 days prior to the exercise;
- Providing trained exercise controllers and evaluators with responsibility for completing all assigned evaluation criteria, documenting observations, and participating in follow-up meetings as requested;
- Ensuring exercise controllers and evaluators complete Exercise/Drill Controller and Evaluator Training (course #020285 or equivalent);
- Providing a factual accuracy review of the draft exercise evaluation report;
- Identifying compensatory measures for findings identified in exercises and DOE evaluations of drills for exercise credit until causal analyses are performed and corrective actions are identified and implemented;
- Developing and submitting corrective action plans to RL/ORP/PNSO, as applicable, for findings identified in exercises, DOE evaluations of drills for exercise credit, and actual responses evaluated by RL, in accordance with RLEP 3.29;
- Submitting corrective action closure documentation to RL/ORP/PNSO, as applicable, in accordance with RLEP 3.29;

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 5 of 8

- Formally tracking corrective actions for findings and suggestions from exercises, DOE evaluations of drills for exercise credit, and actual emergency response evaluations directed by RL, in accordance with contractor corrective action tracking system requirements;
- Ensuring a system for identifying, incorporating, and tracking lessons learned is maintained; and
- Maintaining records associated with assigned exercise findings and corrective actions in compliance with DOE records retention schedules.

#### **4.4 RL Support Contractor**

The RL Support Contractor is responsible to develop and conduct Hanford Site exercises and assist RL with the assessment of contractor conducted drills-for-exercise-credit. Specific responsibilities include:

- Developing and maintaining procedures to implement the requirements of the exercise program;
- Developing and maintaining an annual exercise schedule that ensures each Hanford hazardous facility ERO has an external evaluation every five years;
- Developing Hanford Site exercises that are of sufficient scope and frequency to ensure an adequate response capability is maintained in accordance with DOE/RL-94-02, *Hanford Emergency Management Plan*;
- Developing and conducting a site-level exercise for a severe event no less than once every 5 years that includes a release of hazardous materials at more than one facility/activity, and disruption to site infrastructure;
- Developing and conducting a site-level exercise involving one or more of DOE's Radiological Emergency Response Assets no less than once every three years.
- Developing and maintaining a matrix that identifies planned exercises over the next five years and elements to be tested during the conduct of exercises, determines appropriate objectives based on approved procedures to be tested and verified, and ensures all objectives are evaluated over a five-year period;
- Developing and conducting exercises in accordance with the approved schedule;
- Providing the field exercise package to RL for approval at least 30 days prior to the exercise;
- Documenting the overall exercise evaluation and obtaining factual accuracy review of the draft report;
- Evaluating contractor drills conducted for exercise credit and actual events as directed by RL;
- Conducting an after-action review of the Emergency Operations System when it is activated for an actual incident or condition to identify lessons learned and/or corrective actions;
- Providing the final evaluation report to RL within 45 calendar days of the exercise;
- Reviewing corrective action plans for completeness and adequacy as directed by RL;
- Reviewing corrective action closure documentation for completeness and adequacy as directed by RL;
- Identifying and documenting lessons learned as appropriate;

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 6 of 8

- Developing and coordinating the conduct of annual protective action drills for all areas on the Hanford Site that are located within an Emergency Planning Zone; and
- Providing controller/evaluator training to ensure trained controllers/evaluators are available for exercises.

## **5.0 DEFINITIONS**

### **5.1 Field Exercise**

A field exercise is an operations-based, full scale exercise that tests and validates the responsibilities of all aspects of the Hanford Site ERO, which includes the Incident Command Organization, Hanford EOC including the Shift Office, and the POC. Offsite involvement may include DOE-HQ, state and county emergency centers, and supporting staff such as radiological field teams. Field exercises are conducted in accordance with the annual exercise schedule.

Offsite agencies, including DOE-HQ, state, local, and appropriate Federal organizations, shall be invited to participate in the annual field exercises (and any preparatory tabletop exercises, if conducted). Participation by the offsite agencies is dependent upon the scenario and the agencies' desired level of participation.

Coordination of offsite participation shall be accomplished through a Scenario Review Group (SRG), which shall meet periodically prior to an exercise to develop the exercise scenario package. Exercise objectives for offsite agencies will be discussed with the SRG and included in the scenario, to the extent possible, while achieving the onsite exercise requirements.

Field exercises are conducted in accordance with the annual exercise schedule.

### **5.2 Limited Exercise**

A limited exercise is an operations-based functional exercise that tests and validates the responsibilities of the Incident Command Organization (event scene response), and allows the POC and Hanford EOC, including the Shift Office, to practice their assigned emergency response duties. As such, only the Incident Command Organization is evaluated. There is no offsite involvement.

Communication links, at a minimum, should include the:

- POC;
- Hanford EOC Shift Office;
- Incident Commander/BED to the Site Emergency Director;
- ICP Communicator to the Event Scene Liaison; and
- ICP Hazards Communicator to the UDAC Hazards Communicator.

Limited exercises are conducted in accordance with the annual exercise schedule.

### **5.3 Tabletop Exercise**

A tabletop exercise allows the Hanford Site ERO and designated offsite responders to work through a scenario in one location to demonstrate how each facet of a major response organization contributes to an emergency response. The scope is usually limited to the participants present and the focus is on the decision-making activities of those interacting. No evaluation is conducted for the tabletop exercise.

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 7 of 8

#### **5.4 No-Notice Exercises**

The Hanford Site participates in a program of no-notice exercises, conducted at the discretion of the DOE-HQ Office of Emergency Operations, to determine if the Hanford Emergency Response Organization accomplishes selected objectives based on applicable plans, procedures, and/or other established requirements.

The No-Notice exercise is intended to require minimum resource expenditure and cause limited disruption of facility/site or activity operations. In addition to participation of initial responders, the site exercise organization assigns a “trusted agent” to assist in the identification of a credible emergency scenario and to provide facility-/site-specific information.

#### **6.0 RATINGS**

The following ratings are used to determine the overall evaluation for each exercise objective.

Superior – Performance that demonstrates excellence in a specific response.

Met – Exercise objective is adequately implemented by the contractor. Some issues may be noted.

Not Met – Exercise objective is not effectively implemented by the contractor. Issues are noted.

Deficiencies are issues that are identified by the evaluation team to communicate program deficiencies:

Findings - Findings are validated program deficiencies that warrant a high level of attention on the part of management. If left uncorrected, findings could adversely affect the DOE mission, the environment, worker safety and health, or public or national security. Findings require corrective action plans, status updates, verification, and validation prior to closure.

Improvement Items - Improvement items are areas where performance could be improved or made more efficient.

Strengths are areas where a noteworthy or innovative practice has been implemented that resulted in emergency management program improvements or excellence.

#### **7.0 EXERCISE EXEMPTION PROCESS**

All contractors are required to comply with the annual exercise schedule and are expected to fully participate in emergency preparedness exercises. Exemption requests for participating in any exercise must be submitted no later than five (5) working days prior to the exercise by the facility/organization’s Emergency Management Department to RL. Exemptions from exercises can only be granted by RL for critical work that impacts safety or security or could result in significant loss of research. The process to request an exemption from the exercise is detailed below.

- a) RL will issue an exercise announcement at least 10 working days prior to the exercise that provides instructions for an exemption request.
- b) If an exemption is wanted, the affected contractor must submit to RL a completed Exercise/Drill Exemption Request form.
- c) Requests must be submitted at least 5 working days prior to the exercise so that coordination may be completed.
- d) RL will provide an informal notification to contractors on the status of their exemption request.

**Emergency Response Procedures**

**RLEP 3.32**

**Revision:** 1

**Change Date:** 01/31/23

**Emergency Management Exercise Program**

**Page:** 8 of 8

**This page intentionally left blank.**