



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



August 19, 2015

The Honorable Jessie Hill Roberson
Vice Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW, Suite 700
Washington, DC 20004

Dear Madam Vice Chairman:

This letter is to inform you that the Department of Energy has completed the first deliverable related to Section 6.2.3 of the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 2014-1, *Emergency Preparedness and Response*.

The deliverable, which is enclosed, is a copy of the approved Justification Memorandum for the revision to DOE Order 151.1C, *Comprehensive Emergency Management System*.

If you have any questions, please contact me at (202) 586-9892.

Sincerely,

Ms. Deborah A. Wilber
Associate Administrator
Office of Emergency Operations

Enclosure

cc: J. Olencz, AU-1.1





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JM CHRONOLOGY

JM RECEIVED 10/17/15
OUT FOR REVIEW 7/16/15
DRB DISCUSSION 7/16/15

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

13/16/15

THROUGH: INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

David Bous

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

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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OPI/OPI CONTACT: Office of Emergency Operations (NA-40), William A. Froh, (301) 903-6097.

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 April 15

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.

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